

Nevada Department of Education

Charter School Audit Guide

February 2023

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## 100 *Introduction*

The Nevada Legislature in the 2017 legislative term enacted which stated that all Nevada Charter Schools must have an annual CPA audit. The Nevada Department of Education has developed this guide to provide guidance and clarification to what is required of charter schools and their CPA firms that wish to audit them.

In an effort to support these requirements, the State of Nevada Department of Education (the Department) has developed the charter school *Audit Guide (Guide)* to provide all charter schools within the State of Nevada and their independent auditors with a resource of audit requirements including illustrative financial statement formats. The requirements contained in this *Guide* must be followed by all charter schools; however, items may be added to meet the charter school's needs and independent auditor's professional judgment. The audit firm must be changed every 6 years. However, the audit partner in charge of the audit must be changed every 3 years. After 6 years, the charter school must engage another CPA firm. All financial statements must use the modified accrual basis of accounting; CPA reports using a cash basis will not be accepted. It is the auditors' responsibility to review this audit guide and comply with the requirements contained within. If all audit guide requirements are not completed, the charter school will be deemed out of compliance and all funding will be withheld until the charter school provides a modified audit that is in compliance with this guide.

## 101 *Scope and Organization*

The *Guide* contains two sections; Part I includes the audit policies and procedures and Part II includes auditing and reporting guidelines.

## 102 *Purpose*

The purpose of the *Guide* is to provide procedures to properly complete the charter school's annual audit and provides a uniform approach to the financial statement formats and the related notes to the financial statements. The *Guide* provides recommendations and requirements that will meet the individual charter school's needs to prepare and submit the annual audit report in conformity with laws, regulations and administrative policies governing Nevada charter schools.

The *Guide* also provides detailed information on the financial reporting and audit requirements of the charter school, including applicable laws and regulations regarding audits of grants awarded by the U.S. Government and other funding sources.

102 *Purpose - continued*

The *Guide* is to be used in conjunction with current audit standards and accounting principles generally accepted in the United States of America and is not intended to supplant these standards and principles. These standards and principles may have been updated or revised and new guidance may have been issued subsequent the issuance of this *Guide*. The charter school and its auditors are required to apply all applicable current standards to the audit performed. The *Guide* requires the auditor to properly plan and perform the audit and encourages professional judgment in determining the audit steps necessary to accomplish the audit objectives. Any recommendations or suggestions to improve this *Guide* should be sent to the Nevada Department of Education.

103 *Amending the Guide*

This *Guide* contains the minimum audit policies and procedures for the charter school, as of the date of its promulgation. From time to time, as additional matters require or changes to this *Guide* are appropriate, the Department will amend this *Guide*. The amendments will be published on the Department's web site at the address below:

[http://www.doe.nv.gov/Boards\\_Commissions\\_Councils/CharterAuditCommittee/CharterAuditCommittee/](http://www.doe.nv.gov/Boards_Commissions_Councils/CharterAuditCommittee/CharterAuditCommittee/)

The section should be reviewed annually by the charter school and their auditor to ensure that the audit requirements are maintained on a current basis. **It is the charter school's responsibility to conform to the current reporting requirements of the Department. Incomplete or incorrect annual audit reports will be rejected by the Department and will require resubmission.**

104 *Effective Date*

**The *Guide* will be effective for all charter schools with fiscal years ending on or after June 30, 2018 in which an audit is required (See Section 300), with the exception of Charter School Program Grant reporting requirements (See Appendix B).**

105 *Background*

In accordance with Nevada Administrative Code 387.775, each charter school must have an independent audit conducted of its accounts, consistent with auditing standards generally accepted in the United States of America, and consistent with any guidelines the Department may issue.

Audits must be filed on or before November 1<sup>st</sup> with the governing body of the school. NAC 387.775(4)

The opinion and findings of the auditor contained in the report of the audit must be presented at a meeting of the governing body held not more than 30 days after the report is submitted to it. NAC 387.775(5)

Immediately thereafter, the entire report, together with the management letter required by generally accepted auditing standards in the United States, must be filed as a public record with: (a) The Department; (b) The Legislative Counsel Bureau; and (c) If the school is a charter school, the sponsor of the charter school. NAC 387.775(6)

As a special purpose governmental unit, the charter school will follow the requirements of the Governmental Accounting Standards Board (GASB). GASB is the recognized standard setting body for establishing governmental accounting and financial reporting principles. This *Guide* is updated through the issuance of GASB Statement No. 71 *Pension Transition for Contributions Made Subsequent to the Measurement Date – an Amendment to GASB No. 68*.

The charter school's activities should be accounted for as a *Business-Type Entity* and report all activity within the Proprietary Fund. The charter school will maintain their accounting records and related financial reports on the modified accrual basis of accounting. Also pursuant to GASB Statement No. 62, *Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 1989 FASB and American Institute of Certified Public Accountants (AICPA) Pronouncements*, the charter school should elect to apply the provisions of all Financial Accounting Standards Board (FASB) Statements and Interpretations, APB Opinions and ARB's of the Committee on Accounting Procedures, except for those that conflict with or contradict GASB pronouncements.

The charter school's board of trustees contracts annually with a qualified certified public accounting firm to conduct the audit of the charter school's financial statements in accordance with auditing standards generally accepted in the United States of America, *Government Auditing Standards* issued by the Comptroller General of the United States; and if applicable, the *U.S Office of Management and Budget's Uniform Guidance*. The selected audit firm must be familiar with these standards and related State of Nevada charter school regulations, in order to properly conduct the audit engagement.

While not an audit standard of *Government Auditing Standards*, sound procurement practices for goods and services should be followed. The Department recommends that management document the factors considered and the conclusions reached concerning the auditor's acceptance and retention. The review of retention factors and the acceptance decision should be made in light of the knowledge about the auditor obtained from the prior audit(s) and consideration of matters that may have occurred since the prior audit.

If the audit process is to be bid, then a formal request for proposal should be prepared and all bidders should be evaluated based on a set of criteria that should include: past experience, qualification of the assigned staff, references from similar organizations, professional affiliations, technical abilities, peer review opinion and fee. This process should document how the successful bidder was determined to ensure a fair and objective selection process.

The independent auditor engaged to conduct the charter school audit must be approved by the Nevada COSAL Committee and on the approved charter school list on the Nevada Department of Education website.

Accountants and accounting firms meeting these licensing and independence requirements must also comply with applicable provisions of the public accountancy law and rules of the jurisdiction(s) where the audit is being conducted and the jurisdiction(s) in which they are licensed. The State of Nevada must license public accountants and accounting firms engaged to conduct audits in Nevada.

The auditor and the charter school must fully understand and comply with the independence standards contained within *Government Auditing Standards (2018 Revision)* and the *United States Government Accountability Office (GAO) Government Auditing Standards Answers to Independence Questions*. These documents are available at the GAO web site <http://www.gao.gov/> and should be reviewed prior to contracting the independent auditor.

Auditors should determine whether identified threats to independence are at an acceptable level or have been eliminated or reduced to an acceptable level. A threat to independence is not acceptable if the threat either (a) could impact the auditor's ability to perform an audit without being affected by influences that compromise professional judgment or (b) could expose the auditor or audit organization to circumstances that would cause a reasonable and informed third party to conclude that the integrity, objectivity, or professional skepticism of the audit firm, or a member of the audit team, had been compromised.



When an auditor identifies threats to independence and, based on an evaluation of those threats, determines that they are not at an acceptable level, the auditor should determine whether appropriate safeguards are available and can be applied to eliminate the threats or reduce them to an acceptable level. The auditor should exercise professional judgment in making that determination, and should take into account whether both independence of mind and independence in appearance are maintained. The auditor should evaluate both qualitative and quantitative factors when determining the significance of a threat.

The auditor is required to document threats to independence that require the application of safeguards and the safeguards applied. For non-audit services, regardless of whether threats to independence are determined to be significant, the auditor is required to document (1) the understanding established with the audited entity regarding the non-audit services to be performed and (2) management's ability to effectively oversee the non-audit services, including whether management possesses suitable skills, knowledge, or experience to do so. The auditor also should establish and document in writing his or her understanding with the charter school regarding (1) the objectives of the non-audit service, (2) the services to be performed, (3) the charter school's acceptance of its responsibilities, (4) the auditor's responsibilities, and (5) any limitations of the non-audit service.

In order to conform to the AICPA Statement on Auditing Standards No. 114 (AU Section 380) *The Auditor's Communication With Those Charged With Governance, and Government Auditing Standards* the auditor must reach a clear understanding with the client about the services to be performed for the engagement and should document their understanding in a written engagement letter. The engagement letter should include: the objective and scope of the audit, including the financial statements and supplemental information, if any, to be opined on and the auditing standards to be complied with; management's responsibilities, including internal control over financial statement presentation, compliance and fraud and provide documentation for completion of the audit; auditor's responsibilities, audit procedures for financial statements and compliance and limitations; administrative issues, including the audit fee, workpaper retention, copy of the firm's peer review opinion and letter of comments, if any and the start and delivery dates for the audit report including the draft and final dates. This understanding should be reached prior to the start of the audit process.

201 *Administering the Audit*

The board of trustees should appoint an audit/finance subcommittee to monitor the audit process. The subcommittee is subject to all laws and regulations pertaining to the Open Meeting Law. This subcommittee will contract the independent auditor and review the scope and results of the audit. The audit/finance subcommittee also receives notice of any consequential irregularities and findings that the auditor noted during the engagement. Additionally, the subcommittee will develop a corrective action plan to address all relevant findings noted by the auditor. The audit/finance subcommittee will also review all financial information of the charter school and provide recommendations to the full board of trustees. Further, the Board of Trustees may delegate responsibility to accept the audit to the audit/finance committee who will acknowledge their acceptance of the audit by signing the *Acceptance of the Board of Trustees Letter* (Appendix A), which will be attached to the final audit package for submission to the Department and charter sponsor.

300 *Filing Requirements - Who Must File*

**In accordance with Nevada Administrative Code (NAC) Section 387.775, each charter school shall have an annual independent audit conducted of its accounts, consistent with auditing standards generally accepted in the United States of America and any guidelines the Department or the Office of the State Auditor may issue.**

An audit may be required for pre-opening grant funding or compliance or as a contractual requirement in a school's charter.

**Additionally, a separate and agreed upon procedures may be required for charter schools that receive funding under the Federal Charter Schools Program (CSP). (See Section 303).**

301 *When to File*

In accordance with NAC 387.775(4), a charter school shall have its independent audit concluded and submitted to the governing body not later than 4 months after the close of the fiscal year for which the audit is completed. The opinion and findings of the auditor contained in the report of the audit must be presented at a meeting of the governing body held not more than 30 days after the report is submitted to it and then immediately filed with the Department of Education, the Legislative Council Bureau and the charter school's sponsor.

If an agreed upon procedures report is required for a charter that receive CSP funding the agreed upon procedures report shall be filed on or before November 1<sup>st</sup> following the fiscal year end.

302 *What and Where to File*

A charter school must submit a completed *Reporting Package*, which must adhere to the format described in the *Guide* (See Section 800 *Reporting Package*). An incomplete or incorrect annual *Reporting Package* will be rejected and require correction and/or resubmission. The audit will not be considered submitted to the Department or sponsor until a complete *Reporting Package* is submitted as follows:

**Papers copies of the reporting package will not be accepted; a scanned copy that is searchable in PDF format must be made available to the Department.**

**The Charter School Year End Report** (See Section 900) –file must be submitted to [bhudnall@doe.nv.gov](mailto:bhudnall@doe.nv.gov)

**The Charter School Year End Report** (See Section 900) signed certification statement must be submitted to [bhudnall@doe.nv.gov](mailto:bhudnall@doe.nv.gov)

An audit performed in accordance with the *Office of Management and Budget Uniform Guidance Audits of States, Local Governments, and Non-Profit Organizations (OMB Uniform Guidance)* must be filed with the Federal Audit Clearinghouse. Please refer to *OMB Uniform Guidance* for the federal filing requirements (See Section 500).

[https://www.whitehouse.gov/omb/grants\\_docs/](https://www.whitehouse.gov/omb/grants_docs/)

Please note that updated filing instructions may be provided annually by the Department.

### 303 *Additional Reporting – Charter School Program (CSP) Funding*

If the School receives federal Charter Schools Program funds (CSP) (CFDA No. 84.282) directly from the Department, and the School **does not** meet the threshold for an OMB Uniform Guidance audit, an accountant’s agreed upon procedures report specific to this funding is required.

If the School **does meet** the threshold of an OMB Uniform Guidance audit, and the CSP funding does not meet the criteria for a major program the auditor has the option of either including the CSP funding as a major program and testing accordingly, or performing the accountants agreed upon procedures report. See Appendix B for agreed upon procedures and sample report. The agreed upon procedures report is due November 1<sup>st</sup> following the fiscal year end and is required to be submitted as follows:

**One** electronic copy of the completed *Agreed Upon Procedures Reporting Package* (see Appendix B) in a PDF format must be submitted via the Department’s e-mail. The PDF format must allow for searching and printing. Also, the PDF must be ADA compliant.

### 304 *Penalty for Noncompliance*

The charter school must file an annual audit report by the stated filing deadline to comply with the State of Nevada statutory and regulatory requirements. The Department reserves the right to sanction any charter school that does not comply with this requirement, including but not limited to withholding payment of state funds, conditions, probation or revocation of the charter.

#### 400 *Audit Objective*

The objective of the audit is as follows: the expression of an opinion that provides reasonable assurance that the financial statements and notes present fairly, in all material respects, the financial position, results of operations and cash flows of the charter school, in conformity with accounting principles generally accepted in the United States of America; provides limited assurance on the management discussion and analysis; provides no assurance on the Department's supplemental information. The auditor will also report on the charter school's internal control related to the financial reporting and compliance with laws, regulations, and the provisions of contracts or grant agreements, noncompliance which could have a material effect on the financial statements in accordance with Government Auditing Standards.

If the audit is to be performed in accordance with the Single Audit Act Amendments of 1996 and OMB Uniform Guidance, the auditor will also report on the charter school's internal control related to its major programs and provide an opinion (or disclaimer of opinion) on compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a direct and material effect on each major program.

#### 401 *Charter School Responsibility*

The management of the charter school is responsible for the preparation and fair presentation of the financial statements and related notes in accordance accounting principles generally accepted in the United States of America. Additionally, management is responsible for establishing and maintaining internal control and for compliance with the provisions of applicable laws, regulations, contracts, agreements, and grants and detecting and reporting any issues of fraud. Consequently, management is responsible for the financial statements, the related notes to the financial statements and supplemental information. The auditor will require that the charter school management confirm this responsibility through a management representation letter to be issued to the auditor at the end of the engagement.

#### 402 *Auditor Responsibility*

The AICPA through the Auditing Standards Board issues Statements on Auditing Standards, which provide audit standards and identify the responsibilities of the auditor when issuing an opinion on financial statements, in accordance with auditing standards generally accepted in the United States of America. The auditor is expected to possess adequate professional proficiency and understanding of these Statements on Auditing Standards', and specific proficiency as it relates to State of Nevada charter school regulations, prior to accepting the audit engagement.

The general audit standards under *Government Auditing Standards* require that the audit be performed by personnel who collectively have the necessary technical skills, maintain independence, exercise due professional care in properly planning, conducting and reporting the results of the audit and the audit firm has an appropriate quality control system that is supported by an external quality control review. In order to conform to the *Government Auditing Standards* technical skills requirement, the audit staff must maintain professional proficiency through continuing professional education (CPE) and training. A component of this training requires that each audit staff responsible for planning, directing, performing fieldwork or reporting on the audit must complete every two years, at least 80 hours of CPE, of which 24 hours of the 80 must be directly related to government auditing, the governmental environment, or specific or unique environment in which the audited entity operates.

*Government Auditing Standards* fieldwork standards require that the auditor plan and perform the audit to obtain sufficient appropriate audit evidence so that audit risk will be limited to a low level that is, in their professional judgment, appropriate for expressing an opinion on the financial statements. *Government Auditing Standards* incorporate the AICPA fieldwork and reporting standards and prescribes additional standards for financial audits performed in accordance with *Government Auditing Standards*.

The fieldwork standards include the following:

- The audit is properly planned and supervised. This includes:
- A sufficient understanding of the entity and its environment, including its internal control, is obtained in order to assess the risk of material misstatement of the financial statements whether due to error or fraud, and to design the nature timing and extent of further audit procedure.
- Sufficient appropriate audit evidence must be obtained by performing auditor procedures to afford a reasonable basis for an opinion regarding the financial statement under audit.
- An evaluation as to whether the charter school has taken appropriate corrective action to address findings and recommendations from previous engagements that could have a direct and material effect on the financial statements.
- The audit is designed to provide reasonable assurance of detecting misstatements that result from violation of provisions of contracts or grant agreements that could have a direct and material effect on the financial statements.

402 *Auditor Responsibility - continued*

The auditor is required to express an opinion or disclaim an opinion on the financial statements and notes to the financial statements of the charter school. These financial statements generally include a Statement of Activities (Government-Wide), Statement of Revenues, Expenditures and Changes in Fund Balances, Statement of Revenues, Expenses and Changes in Net Position (Proprietary Funds), Statement of Changes in Fiduciary Net Position (Fiduciary Funds), and Statement of Cash Flows. In conjunction with the financial statements, the report will include the Management Discussion and Analysis (unaudited), the Statement of Net position must have current and non-current assets and liabilities properly categorized and labeled in the Statement of Net Position. There must be a Special Ed Fund column in Revenues, Expenditures and Changes in Fund Balance. The auditor is expected to complete and audit their own financial framework verifications (Appendix E).

403 *Working Papers*

Government Auditing Standards require that working papers contain sufficient information to enable an experienced auditor, having no previous connection with the charter school audit, to ascertain from them the nature, timing and extent of the procedures performed, audit evidence obtained and the results or conclusions reached on significant matters. This allows the Department or other appropriate oversight officials, to adequately review the auditor's work and related conclusions. Working papers must be retained by the auditor for a minimum of five years after the issuance date or longer if the Department notifies the auditor.

500 *Federal Single Audit*

A charter school that expended \$750,000 (currently the fiscal year threshold) or more of federal awards through a combination of direct programs from the federal government, pass-through awards from the State of Nevada Departments, pass-through awards from other entities, such as other state or local governments and nonprofit organizations are subject to the audit provisions of the Single Audit Act and OMB Uniform Guidance. Information regarding OMB Uniform Guidance can be found at: [http://www.whitehouse.gov/omb/circulars\\_default](http://www.whitehouse.gov/omb/circulars_default).

If the charter school is required to perform an audit in conformity with OMB Uniform Guidance, these requirements must be included in the School's audit report submitted to the Department. This includes, but is not limited to the Independent Auditors' Report, the Basic Financial Statement, Notes to the Financial Statements, Supplemental Information - Schedule of Expenditures of Federal Awards, Notes to Schedule of Expenditures of Federal Awards, *Independent Auditors Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards*, *Independent Auditors Report On Compliance for Each Major Program And On Internal Control Over Compliance Required by OMB Uniform Guidance*, Summary of Audit Results, Schedule of Findings and Questioned Costs and Acceptance by the Board of Trustees.

All financials must be in the modified accrual basis of accounting.

501 *Charter School Responsibility under OMB Uniform Guidance*

The provisions of OMB Uniform Guidance require the charter school to:

- Identify, in its accounts, all federal awards received and expended and the federal programs under which they were received. Federal program and award identification shall include, as applicable, the Catalog of Federal Domestic Assistance (CFDA) title and number, award/contract number and year, name of the federal agency, and name of the pass-through entity.
- Document the funding source for all funding received, including the amount of federal funding expended and the extent to which the charter school is subject to an audit in accordance with OMB Uniform Guidance.
- Maintain internal control over federal programs that provides reasonable assurance that the charter school is managing the federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its federal programs.

501 *Charter School Responsibility under OMB Uniform Guidance - continued*

- Comply with laws, regulations, and the provisions of contracts or grant agreements related to each of its federal programs.
- Prepare appropriate financial statements, including the *Schedule of Expenditures of Federal Awards* in accordance with the provisions of OMB Uniform Guidance.
- Ensure audits required by OMB Uniform Guidance are properly performed and submitted when due.
- Follow up and take corrective action on audit findings, including preparation of a summary schedule of prior audit findings and a corrective action plan in accordance with the provisions of OMB Uniform Guidance.
- Electronically prepare, sign and submit the Form SF-SAC *Data Collection Form for Reporting on Audits of States, Local Governments, and Non Profit Organizations*. The Audit must be completed with the form FAC of this section and the reporting package. This section must be submitted within the earlier of 30 calendar days after receipt of the auditor's reports (s), or nine months after the end of the audit period. If the due date falls on a Saturday, Sunday, or Federal Holiday, the reporting package is due the next business day.
- *Requests for management letters issued by the auditor.* In response to requests by a Federal agency or pass-through entity, auditees must submit a copy of any management letters issued by the auditor.
- *Report retention requirements.* Auditees must keep one copy of the data collection form FAC of this section and one copy of the reporting package of this section on file for three years from the date of submission to the FAC.

502 *Auditor Responsibilities*

Prior to auditing the financial statements and conducting the audit of the charter school, the independent auditor is urged to consult the following requirements: *Single Audit Act Amendments of 1996*, the *OMB Uniform Guidance, Audits of States, Local Governments and Non-Profit Organizations*, the *OMB Uniform Guidance Compliance Supplement*, the *AICPA Audit and Accounting Guide for Audits of State and Local Governments* and, *AU-C 035 Compliance Audits*.

503 *OMB Uniform Guidance Penalties*

No audit costs may be charged to federal awards when audits required by OMB Uniform Guidance have not been made or have been made, but not in accordance with the provisions of OMB Uniform Guidance. In cases of continued inability or unwillingness to have an audit conducted in accordance with OMB Uniform Guidance, the circular indicates that federal agencies and pass-through entities shall take appropriate action using sanctions such as:



- Withholding a percentage of federal awards until the audit is completed satisfactorily.
- Withholding or disallowing overhead costs.
- Suspending federal awards until the audit is conducted.
- Terminating the federal award.

## PART II AUDITING AND REPORTING GUIDELINES

### 600 *Accounting Policies - Financial Reporting Entity*

The charter school is classified as a special purpose government entity and operates as a business type entity within the State of Nevada. GASB Codification Section 2100 'Defining the Financial Reporting Entity' should be referred to when determining the reporting entity for the School.

The financial reporting entity consists of organizations for which the School is financially accountable. The School may determine through the exercise of management's professional judgment that the inclusion of an organization that does not meet the financial accountability criteria is necessary in order to prevent the reporting entity's financial statements from being misleading. (see Section 701). In such circumstances, that organization should be included as a component unit.

An organization other than a primary government (such as other stand-alone governments) serves as a nucleus for its reporting entity when it issues financial statements. The financial reporting entity consists of the stand-alone governments and all component units for which it is financially accountable, and other organizations for which the nature and significance of their relationship with the stand-alone government are such that exclusion would cause the charter school's financial statements to be misleading. Any stand-alone government with a voting majority of its governing board appointed by a primary government should disclose that accountability relationship in its financial statements.

### 601 *Accounting Principles*

The accounting principles of the charter school must conform to accounting principles generally accepted in the United States of America (GAAP) that are applicable to a special purpose governmental entity. Therefore, revenues and expenses are recorded using the modified accrual basis of accounting and requires that revenues are recognized in the accounting period in which they are earned and expenses are recognized in the period in which goods or services are received or incurred.

### 602 *Auditing Standards and Guidance*

The charter school shall maintain their financial records in accordance with GAAP and conduct an annual independent audit in accordance with the *Government Auditing Standards* issued by the Comptroller General of the United States of America. These standards incorporate all the AICPA generally accepted auditing standards for fieldwork and reporting, as well as the related AICPA Statement on Auditing Standards'. *Government Auditing Standards* prescribes general standards and additional fieldwork and reporting standards beyond those provided by the AICPA when performing financial audits.



602 *Auditing Standards and Guidance - continued*

In accordance with the AICPA, the first audit fieldwork standard requires that the audit be properly planned. In planning the audit the auditor should, at a minimum, become familiar with this *Guide* and the following:

- AICPA Professional Standards
- AICPA Audit and Accounting Guide for States and Local Government Units
- Financial Accounting Standards Board Accounting Standards Codification
- Governmental Accounting Standards Board Current Text
- Government Accounting Standards Board Codification
- OMB Uniform Guidance: Audits of Institutions of States, Local Governments and Non-Profit Organization
- OMB Uniform Guidance, Compliance Supplement
- OMB Super Circular, Cost Principles for State and Local Governments
- Common Rule for Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments
- Provisions of NAC 386 related to Charter Schools
- Technical Advisories issued by the State of Nevada Department of Education

603 *Audit Objectives*

The primary audit objectives when performing an audit of a charter school are to determine whether:

- The financial statements and related notes are presented fairly, in all material respects, in conformity with GAAP.
- The charter school has implemented and utilized reasonable financial and administrative procedures and internal controls to adequately safeguard assets.
- State and Federal reports and claims for advances or reimbursements contain accurate and reliable financial data and are presented in accordance with the terms of applicable agreements.
- State and Federal funds are being expended in accordance with the terms of applicable agreements and those provisions of laws or regulations that could have a direct and material effect on the financial statements and related notes.

## 700 *Financial Statement Considerations – Comparative Financial Statements*

GASB standards recommend, subsequent to the first year of operation, that the charter school issue either comparative or summarized comparative financial statements depending on whether the charter school has a component unit or not. If comparative financial statements are presented, restatement of prior-period financial statements is required. Early implementation is encouraged by the Department.

## 701 *Component Unit Consideration*

In accordance with GASB, with the exception of a charter school that is part of a network of charter schools (see Section 702 for treatment of a network of charter schools), the charter school is considered the primary government. Numerous charter schools within the State of Nevada have associated organizations, which may be non-profit, for-profit, or otherwise. These organizations should be evaluated during the planning stage of the audit to determine whether or not they should be considered a component unit of the charter school, and how they should be reported in the audit. The financial information for these component units should be reported in conjunction with the charter school's financial statements and accounted for in accordance with *GASB Codification Section 2600*. See Appendix E for more information about identifying component units.

In accordance with GASB, component units can be either be treated as (1) “blended” with the charter school or (2) “discretely presented” from the charter school. Regardless of treatment, the financial information for the charter school and each component unit should be presented in individual columns in the financial statements in order to separately distinguish the balances and transactions of the charter school and the component unit(s). As required by GASB, the auditor should opine on the financial activity of the charter school and component units based on the treatment of component units.

If the charter school has a relationship with a separate non-profit or governmental entity, but the entity does not meet the criteria for including the reporting entity’s financial statements as a component unit of the charter school, then all the transactions incurred between the organization and the charter school should be evaluated as related party transactions and disclosed in accordance with GAAP and the *Guide*. The Department requires that all related party transactions, whether material or immaterial be disclosed in the notes to the financial statements.

## 702 *Considerations for a Network of Charter Schools*

A network of charter schools is made up of multiple charter schools which are governed by one board of trustees. As required by GASB, the board of trustees, which oversees the network of charter schools, is considered the primary government for auditing purposes. The financial information for each charter school in the network should be presented in individual columns in the financial statements in order to separately distinguish the balances and transactions of each charter school. However, as required by GASB, the auditor is required to opine on the combined total all of all the charter schools’ financial activity.

The reporting package format of your charter school depends on whether the charter school is a part of a network of charter schools, has to conduct an audit in accordance with OMB Uniform Guidance, and/or has a component unit. The appropriate reporting package applicable to the School should be submitted.

Some variations from the illustrations may be appropriate, to conform to proper disclosures required by the charter school, GAAP and this *Guide*. The reporting package to be submitted to the Department must include the following:

**Minimum Reporting Package - No OMB Uniform Guidance audit required:**

- Management Discussion and Analysis
- Independent Auditors' Report
- Basic Financial Statements
- Statement of Net Position
- Statement of Revenues, Expenses and Changes in Net Position
- Statement of Cash Flows (Direct Method)
- Required Disclosures (Notes to the Financial Statements)
- Independent Auditors Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards
- Schedule of Findings and Questioned Costs
- Schedule of Prior Audit Findings
- Board of Trustees Acceptance letter (*See Appendix A*)

**Reporting Package - OMB Uniform Guidance audit required**

In addition to the items listed above in the 'Minimum Reporting Package', the following should be included if an OMB Uniform Guidance audit is required:

- Schedule of Expenditures of Federal Awards
- Notes to Schedule of Expenditures of Federal Awards
- Independent Auditors' Report on Compliance for Each Major Program and On Internal Control Over Compliance Required by OMB Uniform Guidance
- Summary of Auditors' Results
- Schedule of Findings Relating to the Financial Statement Audit
- Schedule of Findings and Questioned Costs Relating to Federal Programs
- Schedule of Prior Audit Findings
- Board of Trustees Acceptance letter
- Summary Schedule of Prior Year Audit Findings
- Charter School's Corrective Action Plan, if any (may be included within the Schedule of Findings and Questioned Costs listed above)
- Form SF-SAC *Data Collection Form for Reporting on Audits of States, Local Governments, and Non Profit Organizations*. See <http://harvester.census.gov/sac> for copy of report and instructions for filing (*does not have to be submitted to the Department*)

**Other Reporting Requirements by the Department:**

- Management Letter, if any (under separate cover)
- Charter School End of Year Financial Report (See Section 900)
- Federal Charter School Program agreed upon procedures report, if necessary (see Section 303)

801 *Management Discussion and Analysis*

The Management Discussion and Analysis (MD & A) is prepared by the charter school's management to introduce the basic financial statements and provides an analytical overview of the charter school's financial activities. Although not part of the basic financial statements the MD & A is considered required supplemental information for all charter schools and is presented before the basic financial statements. The auditor should follow the guidance of SAS 120 *Required Supplementary Information*.

802 *Basic Financial Statements*

The following sections will provide a summary of each of the basic financial statements issued by the charter school.

803 *Statement of Net Position*

The *Statement of Net Position* reports all financial and capital resources of the charter school and reflects the difference between assets and liabilities as net position. GASB requires that the *Statement of Net Position* be presented using the following categories: *Current Assets, Non-Current Assets, Deferred Outflow of Resources, Current Liabilities, Non-Current Liabilities Deferred Inflow of Resources* and *Net Position*.

School should determine the classification of transactions as Assets, Deferred Outflows of Resources, Liabilities or Deferred Inflows of Resources. The following are provided as basic definitions:

Assets – Resources with present service capacity that the government presently controls.

Liabilities – present obligations to sacrifice resources that a School has little or no discretion to avoid.

Deferred Outflows of Resources – consumption of assets by a School that is applicable to a future reporting period.

Deferred Inflows of Resources – acquisition of assets by a School that is applicable to a future reporting period.

803 *Statement of Net Position - continued*

The following is a list of common current and non-current assets and liabilities. The list is for illustrative purposes only and is not considered to be all-inclusive.

<b><u>CURRENT</u></b>		<b><u>NON-CURRENT</u></b>	
<i>Assets</i>			
Cash and cash equivalents		Land and building	
Accounts receivable		Building/leasehold improvements	
Grants receivable - State		Furniture and equipment	
Grants receivable- Federal		Restricted cash and cash equivalents	
Grants receivable - Private		Long-term investments	
Contributions receivable		Reserve for future capital projects	
Prepaid expenses			
Short-term investments			
<i>Deferred Outflows of Resources</i>			
<i>Liabilities</i>			
Accounts payable		Non current lease obligation	
Accrued expenses		Non current debt	
Advances on contracts		Deferred loss	
Current debt payable			
Current lease obligation			
<i>Deferred Inflows of Resources</i>			



The following **do not** meet the definition of Deferred Outflows of Resources and Deferred Inflow of Resources as they have present service capacity or represent a present obligation to sacrifice resources.

*Deferred Outflows of Resources*

- Prepayments

*Deferred Inflows of Resources*

- Resources received in advance of an exchange transaction

Amounts included within the *Net Position* should be broken down into the following three categories:

- *Net Investment in Capital Assets* - Includes capital assets, including restricted capital assets, net of accumulated depreciation and reduced by any debt attributable to the acquisition, construction or improvement of those assets. The auditor must delineate how principal and interest should be presented under debt service in the Statement of Revenues, Expenditures and Changes in Net Position. The auditor must provide a statement that clearly states whether or not a school is meeting its loan obligations and/or delinquent with its debt service payments.

The *Net Invested in Capital Assets, Net of Related Debt* should be calculated using the formula below and disclosed in the notes to the financial statements:

Cost of Capital Assets Acquired  
**Less:** Accumulated Depreciation  
**Less:** Outstanding Debt Related to Capital Assets  
**Equals:** Net Investment in Capital Assets

- *Restricted Net Position* – Includes net position by major categories of the restrictions, if any, either on the face of the Statement of Net Position or in the notes to the financial statements.
- *Unrestricted Net Position* – Includes net position that does not meet the definition of *Net Investment in Capital Assets, Net of Related Debt* or *Restricted Net Position*.

The formula below is derived as Adjusted Net Position to offset the pension liability balance in charter school at the end of the fiscal year which should be handled and reflected in the state pension records)

- Net Position (Beginning of Year)*
- +Change in Net Position*
- =Net Position (End of Year)*
- Net Pension Liability (to reverse out)*
- Net Pension Liability Related Items (to reverse out)*  
*= Adjusted Net Position*

The summary reconciliation of the adjusted net position (the formula above) after the reversal of net pension liability (less or reverse out) and net pension liability related items (less or reverse out) should address separately in the Notes to the Financial Statements,

804 *Statement of Revenue, Expenses and Changes in Net Position*

The *Statement of Revenue, Expenses and Changes in Net Position* reflects the operating and non-operating activities of the charter school. The statement distinguishes between operating and non-operating revenues and expenses, which should be presented under the captions *Operating Revenues, Operating Expenses* and *Non-Operating Revenues and Expenses*. Revenues from Capital Contributions, special and extraordinary items and transfers should be reported separately in the statement after the *Non-Operating Revenues and Expenses* section. The auditor must indicate if the banks/credit unions the charter school uses are located in Nevada and FDIC insured and/or collateralized for amount in excess of \$250,000.

The following is a list of typical charter school revenue and expense items by classification. The listing is presented for illustrative purposes only as management should use their judgment when determining which revenue and expense categories should be included within this statement.

<i>Operating Revenues</i>		<i>Operating Expenses</i>	
	Tuition		Salaries
	Grants - State		Payroll taxes
	Grants - Federal		Fringe benefits
	Grants - Private		Office supplies and materials
	Nutrition Funding - State		Professional development
	Nutrition Funding - Federal		Dues, licenses and subscriptions
	Program fees		Recruitment/advertising
	Contributions in-kind transportation		Travel expense
	Transportation aid		Contracted services
			Instructional technology
			Testing & assessment
<i>Non Operating Revenues and Expenses</i>			Staff stipend
	Grants - Private		Health services
	Contributions, in-kind		Student transportation
	Contributions		Depreciation
	Rental income		Food services
	Investment income		Athletic services
	Interest expense		Utilities
	Fundraising expense		Maintenance of building and grounds
	Management fees revenue		Maintenance of equipment
			Rental/lease of building & grounds
<i>Capital Contributions</i>			Rental/lease of equipment
	Capital contributions		Insurance
	Capital grants and gifts		Management fee
			In-kind transportation

The definition of operating activity must be disclosed in the notes to the financial statements.

805 *Statement of Cash Flows*

The *Statement of Cash Flows* summarizes cash inflows and outflows from operating, investing and financing activities that occurred during the accounting period. The charter school, in accordance with GASB is required to prepare the *Statement of Cash Flows* using the direct method. The direct method reports cash receipts and cash disbursements from operating activities for the fiscal year. This method also requires that a reconciliation be prepared that agrees the change in operating net position to the net cash provided by or used in operating activities.

The *Statement of Cash Flows* consists of the following classifications of cash flow:

1. Cash Flows from Operating Activities
2. Cash Flows from Non Capital Financing Activities
3. Cash Flows from Capital and Related Financing Activities
4. Cash Flows from Investing Activities

- *Operating Activities* – Includes cash from operating activities including the following:

<i>Operating Activities</i>	
Inflows	Outflows
Receipts from tuition	Payments to employees
Receipts from state grants	Payments of employee benefits
Receipts from federal grants	Payments to vendors and suppliers
Other operational cash inflows	Other operational cash outflows

- *Non-Capital Financing Activities* - Includes cash flows related to non operating grants received from or provided to other governments as well as other non operating revenues and expenses and borrowing money for purposes other than buying or building capital assets.
- *Capital and Related Financing Activities* - Includes cash flows related to borrowing and repaying debt for purchasing and constructing capital assets.
- *Investing Activities* - Include cash flow from the purchases and sales of all investments and any dividends or interest earned on these investments.

The following are required disclosures and/or presentations that must be reported in addition to the disclosures required by GAAP:

- Disclosure of the Education Management Organization (EMO) management fees, equipment fees, rent, etc. including any fees the EMO sent to or received from a related party. Fees paid or fees received by a School during the fiscal year and the nature of the service(s) provided and any amounts owed at the end of the fiscal year.
- Disclosure of the Education Management Organization (EMO) management fees, equipment fees, rent, etc. including any fees the EMO sent to or received from a related party should be broken down by fees paid or received as a separate line item in the Statement of Revenue, Expenses and Changes in Net Position.
- Related party transactions, whether material or not`
- Management Discussion and Analysis – explanation of any operational loss and statement if it was budgeted for.
- Management Discussion and Analysis – Explanation of methodology how the School projected their budgeted tuition amount.
- Copies of actual performance framework.

807 *Schedule of Findings and Questioned Costs*

The *Schedule of Findings and Questioned Costs* must identify significant deficiencies, material weaknesses, fraud, illegal acts, violations of provisions of contracts and grant agreements, and abuse related to financial statements for which *Government Auditing Standards* requires reporting.

In addition, if an audit is required to be conducted in accordance with OMB Uniform Guidance this section should identify the federal audit findings required to be reported by section 501(a) of OMB Uniform Guidance, including significant deficiencies, material weaknesses and material instances of noncompliance, questioned costs, as well as any abuse involving federal awards that are material to the major programs. The results of the audit should be included in the *Summary of Audit Results* section.

Audit findings that relate to both the financial statements and the federal awards should be reported in both sections listed above. Findings should be presented in the following format:

<i>Condition:</i>	Detail description of the condition.
<i>Effect:</i>	Effect of the condition on the charter school’s operation.
<i>Cause:</i>	Reason for the existence of the condition.
<i>Criteria:</i>	Regulation, law, contractual provision, internal control etc. used for the determination of the finding.
<i>Recommendation:</i>	Recommendation to correct the condition.
<i>Corrective Action Plan:</i>	Charter school’s plan to correct the condition.
<i>Responsibility:</i>	Individual at the charter school responsible for the implementation of the corrective action.
<i>Timing:</i>	Timeframe for implementation of corrective action.

808 *Schedule of Prior Audit Findings*

The *Schedule of Prior Audit Findings* reports the auditors assessment of the status of all findings included within the prior year's Schedule of Findings and Questioned Costs.

809 *Schedule of Expenditures of Federal Awards*

The *Schedule of Expenditures of Federal Awards* reports all federal activity within the charter school, inclusive of federal expense transactions associated with grants, cost reimbursement contracts, cooperative agreements and direct appropriations; the disbursement of funds passed through to subrecipients; the use of proceeds under loan and loan guarantee programs; the receipt of surplus property; the receipt or use of surplus income; and the distribution or consumption of food commodities.

810 *SF-SAC Data Collection Form for Reporting on Audits of States, Local Governments, and Non Profit Organizations. (Data Collection Form)*

The *Data Collection Form* provides required information about the charter school audit inclusive of the federal awards it administers and the audit results in accordance with OMB Uniform Guidance. This information is required by OMB Uniform Guidance to be prepared at the completion of each audit and submitted, along with the audit report to the Federal Audit Clearinghouse electronically.

811 *Board of Trustees Acceptance Letter*

The Department requires that each charter school include a *Board Acceptance Letter* certifying that the board of trustees accepts the information included in the *Reporting Package*. The board of trustees will acknowledge that the audit was performed in accordance with *Government Auditing Standards* and the guidelines set forth in this *Guide*. The letter must be signed by either the President of the board of trustees, the Treasurer or a designated representative. (See *Appendix B*)

812 *Management Letter*

Issues identified that are not material but more than inconsequential may be communicated in a management letter. In addition, items identified that may improve operational efficiency and effectiveness or otherwise improve the charter school's internal control may also be communicated in a management letter. When a management letter is issued only for the purpose of providing management with efficiency comments or to communicate non-significant deficiencies a reference to the management letter does not need to be made in the *Independent Auditors Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards*. Otherwise, a reference to the management letter should be made in the body of this report.

900 *Charter School End of Year Financial Report*

The charter school is required to submit a *Charter School End of Year Financial Report (CSEYOYFR)* to the Department on a date annually determined by the Department, but generally on or before the Wednesday before Thanksgiving of each year. The Department has developed a prescribed reporting format contained in the *CSEYOYFR*. Please note as outlined in section 807, the CSEYOYFR contains the required annual surplus calculation.

At the time of the publication of this Guide, the prescribed format consists of the following schedules, though this is subject to change:

Schedule 1 – *Statement of Net Position*

Schedule 2 – *Statement of Revenue, Expenses and Changes in Net Position*

Schedule 3 – *Schedule of Functional Expenses*

Schedule 4 – *Schedule of Charter School Transportation Expenditures*

Schedule 5 – Audit Questionnaire

Schedule 6 – Certification, Checks and Comments

The CSEYOYFR is not complete unless the signed Certification Statement is sent to the Department via e-mail.

**The CSEYOYFR is considered unaudited information for purposes of the *Reporting Package*, but does require compliance testing as noted in Section 1011 of this *Guide*.**

## 1000 *Compliance Requirements*

The compliance requirements identified below have been developed by the Department as being inherently risky and highly susceptible to non-compliance. The audit procedures associated with these compliance requirements are intended to be illustrative and are not to be considered comprehensive. The design of appropriate audit tests to satisfy these requirements should be based upon the auditors' professional judgment.

The compliance requirements below are not applicable to a closeout audit being performed. The applicable compliance requirements for a closeout audit are included in **Appendix D**.

## 1001 *Internal Controls*

In accordance with the Department's charter school regulations the charter school, under the direction of the board of trustees, is required to establish and maintain adequate accounting records and internal control procedures. A charter school receiving federal financial assistance must adhere to the internal control requirements contained in OMB Circular A-87, *Cost Principles for State, Local, and Indian Tribal Governments (amended May 10, 2004)*. Auditors should consult the compliance supplement for OMB Uniform Guidance for more information concerning specific internal control requirements, if applicable.

Internal control should consist of the following five components: control environment, risk assessment, control activities, information and communication and monitoring. The objectives of internal control relate to proper financial reporting, efficient operations and compliance with grant and management requirements.

Prior to reviewing and evaluating internal control the auditor should review the AU Section 314 Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatements the 2011 revision of the *Government Auditing Standards*.

### *Recommended Audit Procedures:*

- Review and determine if written internal control policies are available.
- Assess the adequacy of the internal controls in accordance with AU 314 and OMB Super Circular, if applicable.
- Assess the adequacy of the internal controls pertaining to compliance requirements for OMB Uniform Guidance, if applicable.

## 1002 *Record Keeping*

In accordance with the Department's charter school regulations the charter school is required to maintain their financial system and records in accordance with accounting principles generally accepted in the United States of America. Financial books and records of the charter school must reflect the source of all assets, liabilities, net position, revenues, and expenses recorded during the fiscal year. For network schools, each school must remain a separate financial system to record the financial activity of each school.

### *Recommended Audit Procedures:*

- Determine whether the charter school maintains a financial system of recording and documenting all financial transactions.
- Review supporting documentation for selected transactions during the audit to determine if they are properly supported.
- Determine that the financial system properly tracks and reports each school separately.

## 1003 *Related Party Disclosure*

In accordance with the State of Nevada Charter School *Recommended Fiscal Policies and Procedures Guide* the charter school will follow Nevada Revised Statutes (NRS) 281A, the conflict of interest law and file financial disclosures pursuant to NRS 281.571. The charter school may not be operated for the benefit of an affiliated or unaffiliated organization or an individual in his or her own private capacity or individuals related to the charter school or members of its management. Thus, the charter school will be guided by the principle of arms-length standards with all affiliated or unaffiliated organizations or with a private or related individual(s).

### *Recommended Audit Procedures:*

- Review and become familiar with the requirements and recommendations as codified in the AICPA Statement of Auditing Standards, FASB Accounting Standards Codification 850 *Related Party Disclosures*, *Government Auditing Standards*.
- Obtain a listing of the related party transaction that occurred during the year whether material or not.
- Determine if the building is leased from a related party. If so, determine if the rent paid is the market rate for the area.
- Obtain representation from management and the board of trustees as to whether they or any other related party engaged in any transactions with the charter school during the year and disclosed **all** the required transactions in the accompanying notes to the financial statements.
- Determine that all transactions, between the network schools and other component units are properly disclosed in the notes to the financial statements



## 1004 Reporting

In accordance with the provisions of Title 34 of the Nevada Revised Statutes and the accompanying regulations, specifically included NRS Chapter 338A and NAC Chapters 386 and 387, the charter school is required to submit both financial and non-financial reports. These reports include the *Annual Report and Enrollment Reports*.

*Capital Plan (contained within the Annual Report)* – Approved capital plan for the next fiscal year including the amount held in reserve for the purchase or renovation an academic facility pursuant to the capital plan. A vote of the charter school’s board of trustees is required to designate funds to be held in reserve for such purposes. These reserve funds should be reported as an adjustment to the Supplemental Schedule of 20% Excess Carryover Calculation and also reflected in the Statement of Net Position. If exact amounts for designated reserves cannot be determined prior to the close of the fiscal year, adjustments may be made by boards of trustees after June 30 but prior to the finalization of financial statements for the fiscal year. All designations **must be** certified by a board vote.

*Financial Audit* – Each charter school shall have an independent audit conducted of its accounts consistent with GAAS, *Government Auditing Standards* and any guidance issued by the Department or the State Auditor.

### *Recommended Audit Procedures:*

- Review the charter school's procedures, if applicable, for preparing these required reports.
- Examine a sample of the enrollment reports, along with any supporting schedules used to prepare them and determine if the reports were prepared in accordance with the charter school's procedures, were properly supported and filed in a timely manner.
- Determine if the prior year audit report was submitted to the Department in a timely manner, including approved extensions.
- Review approval received for capital plan submitted.

## 1005 Required Policies

In accordance with Department, State Board of Education and Sponsor regulations the charter school must have formalized policies/procedures relating to: student code of conduct (including criteria and procedures for expulsion); enrollment policy; criminal background checks; complaint procedures and multi-hazard evacuation plan.

### *Recommended Audit Procedures:*

- Determine if the policies/procedures described above have been developed and documented.
- Determine if the school governing board approved all budget amendments.

### *1006 Board of Trustees*

In accordance with the Nevada Revised Statutes (NRS) 388A.366, the charter school shall conduct public meetings.

#### *Recommended Audit Procedures:*

- Become familiar with NRS 388A.366.
- Examine evidence and determine that public meetings were properly conducted in accordance with the above requirements.

### *1007 Occupancy*

In accordance with the provisions of Nevada Administrative Code 386.140 the charter school shall provide written documentation that the facility to be used is approved for use as a school by the building inspector in the municipality in which the charter school is located.

#### *Recommended Audit Procedures:*

- Examine current occupancy permit and determine if the permit is current and displayed in an accessible area.
- Examine the safety/fire inspection certificate.
- Examine the license to use explosives and flammable compounds in educational programs, if applicable.
- Examine the evidence of insurance coverage.

### *1008 Procurement Policy*

In accordance with Chapter 46 of the acts of 1997, the charter school regulations state that the charter school administrator who serves as procurement officer must obtain a Massachusetts Certified Public Purchasing Official (MCPPO) certificate. (Horace Mann Charter school administrators are also required to obtain an MCPPO certificate). There is not a requirement to be MCPPO designated; the law requires that the administrator responsible for procurement receives a MCPPO certificate stating that they have successfully completed either the Public Contracting Overview seminar or the Charter School Procurement seminar.

#### *Recommended Audit Procedures:*

- Examine evidence and determine that the charter school administrator who serves as procurement officer has participated and obtained the certificate of completion of either the Public Contracting Overview seminar or the Charter School Procurement seminar. If the individual has not participated in the required seminars, determine if the individual is enrolled in or on waitlists for the required seminar.

### 1009 Charter Amendments

In accordance with the provisions of NRS 388A.276 and 279, any major changes in the charter school's operation must be approved by the charter school's sponsor prior to the changes becoming effective.

#### *Recommended Audit Procedures:*

- Determine if the charter school made any changes to their programs or initial governance that requires an amendment to their charter. If so, determine if the board of trustees approved the amendment request, communicated the changes to the school's sponsor, and received approval from the sponsor.

### 1010 Nevada Public Employees Retirement System (PERS)

In accordance with Nevada Administrative Code 286, employees of a charter school are considered a public employee and charter schools are required to contribute to the Public Employees Retirement System for their retirement. However, employers of Educational Management Organizations may not be required to be members of PERS.

#### *Recommended Audit Procedures*

- Review and become familiar with Nevada Administrative Code 286 business practices.
- Determine by selecting a sample of employees that eligible employees are contributing to the plan and the appropriate percentage of their salary is being withheld.
- Examine evidence that eligible employees are enrolled in PERS and that payroll deductions are being withheld and remitted to PERS on a monthly basis.
- Determine the extent of any outstanding payments owed to PERS by the charter school.

### 1011 Charter School End of Year Financial Report

The charter school is required to submit a *Charter School End of Year Financial Report (CSEYOYFR)* to the Department following its fiscal year end (See Section 900). The Department has developed a standard reporting format for the *CSEYOYFR*. The *Recommended Audit Procedures* listed below should be applied to the report submitted for the previous fiscal year end. (i.e., as part of the fiscal year 2016 audit, the *CSEYOYFR* report for the year ended June 30, 2015 will be examined).

#### *Recommended Audit Procedures*

- Determine if the financial information was prepared on the modified accrual basis of accounting.
- Trace the amounts reported to the audited financial statements and verify agreement or perform alternative procedures to verify the accuracy and completeness of the amounts reported.
- Test mathematical accuracy of the schedules and supporting worksheets.

- For financial data, review accounting records and ascertain if all applicable accounts were included in the schedules.
- Obtain written representation from management that the reports are the actual copies submitted to the Department and contain accurate data.

#### *1012 Networks of Charter Schools*

In accordance with adopted regulation R089-16A, more than one charter school may be managed by a single board of trustees. Funding for a charter school managed by a single board of trustees may not be transferred among individual schools within the network.

#### *Recommended Audit Procedures*

- Determine if there is a written cost allocation plan for costs shared between network schools and properly disclose all transactions between the schools in the notes to the financial statements.
- Determine if any shared costs between schools not located within the same district are based on actual costs incurred or a reasonable allocation plan consistently applied. (reasonable basis of allocation includes number of students, number of employees or some other reasonable basis as determined by management)
- Determine that funding is not transferred among individual schools within the network unless such schools are located within the same sending district and all transfers are approved by a vote of the board of trustees
- If funds are loaned to schools, whether in district or out of district, they are approved by a vote of the board of trustees and documented by an agreement stating the terms and conditions

*Print on letterhead of School*

**ACCEPTANCE OF THE BOARD OF TRUSTEES**

We, the board of trustees of ABC Charter School or designee, have voted to accept the representations of management and the expression of the opinions made by (Insert Auditors Name) as embodied in the financial statements and independent auditor's reports for the year ended June 30, 20X2 (Insert both years if comparative).

We also certify that the representations made by management and the disclosures in the financial statements are accurate and have been correctly and completely disclosed as required by accounting principles generally accepted in the United States of America and the *State of Nevada Charter School Audit Guide* for the period ended June 30, 20X2. (Insert both years if comparative).

\_\_\_\_\_  
Board President or Treasurer  
or Other Designated Person

\_\_\_\_\_  
Date

### **Agreed-Upon Procedures for CSP Funding**

1. Obtain a copy of the CSP grant award, inclusive of any amendments.
2. Obtain the detail of expenditures incurred for the period under review relating to the CSP grant and reconcile the total expenditures incurred to the CSP grant revenue recorded by the charter school in its general ledger and investigate the differences.
3. Compare the approved CSP budget to the actual expenditures incurred and investigate any differences greater than 10% of the total budget.
4. Select a sample of expenditures from the detail expenditures incurred during the period based on the criteria set forth below:
  - a. Payroll - Select 10 items or 10% of the total number of payroll items charged to the CSP grant, whichever is less.
  - b. Other expenses – Select 10 items or 10% of the total number of items charged to the CSP grant, whichever is less.

And determine the following:

- i. The expenditure is in accordance with the purpose of the grant and that pre-opening expenditures are charged to the pre-opening periods. (See non-regulatory guidance on the CSP grant at <http://www2.ed.gov/programs/charter/nonregulatory-guidance.html>)
  - ii. The expenditure was charged to the proper budget category.
  - iii. The expenditure was charged to the appropriate fiscal period.
5. Obtain Request for Funds forms (RF 1) submitted to the Department during the period under review.
  - a. Trace the amounts reported in the RF1 to the listing of expenditures and determine if any discrepancies.
  - b. If items have not yet been requested for reimbursement, inquire of responsible charter school officials as to the plan for requesting reimbursement, and determine if a receivable is recorded within its general ledger, if appropriate.
  - c. If RF 1 forms include amounts for cash advances (Cash Expenditures Anticipated During Next Month), determine if the total of the funds expended in the month subsequent to the date of the request is equal to or exceeds the amount requested.

## Template for Independent Accountant's Report on Agreed Upon Procedures for CSP Funding

CPA letterhead

To the Board of Trustees of ABC Charter School and  
The Nevada Department of Education

### *Independent Accountant's Report on Applying Agreed Upon Procedures*

We have performed the procedures enumerated below, which were agreed to by the management of ABC Charter School (the School) and the Nevada Department of Education (the Department), (the specified parties) solely to assist in evaluating the School's assertion to the Department that it has complied with the requirements of the Federal Charter Schools Program grant (CSP), inclusive of Federal and Department guidelines in managing the CSP grant. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in the report. Consequently, we make no representations regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

Our procedures are as follows:

1. Obtain a copy of the CSP grant award, inclusive of any amendments.
2. Obtain the detail of expenditures incurred for the period under review relating to the CSP grant reconcile the total expenditures incurred to the CSP grant revenue recorded the Charter School and investigate the differences.
3. Compare the approved CSP budget to the actual expenditures incurred and investigate any differences greater than 10% of the total budget.
4. Select a sample of expenditures from the detail expenditures incurred during the period based on the criteria set forth below:
  - a. Payroll - Select 10 items or 10% of the total number of payroll items charged to the CSP grant, whichever is less
  - b. Other expenses – Select 10 items or 10% of the total number of items charged to the CSP grant, whichever is less

And determine the following:

- i. the expenditure is in accordance with the purpose of the grant and that pre-opening expenditures are charged to pre-opening periods. (See non-regulatory guidance on the CSP grant at <http://www2.ed.gov/programs/charter/nonregulatory-guidance.html>)
  - ii. the expenditure was charged to the proper budget category
  - iii. the expenditure was charged to the appropriate fiscal period
5. Obtain Request for Funds forms (RF 1) submitted to the Department during the period under review.
- a. Trace the amounts reported in the RF1 to the listing of expenditures and determine if any discrepancies.
  - b. If items have not yet been requested for reimbursement, inquire of responsible School officials as to the plan for requesting reimbursement, and determine if a receivable is recorded, if appropriate.

The results of performing these procedures are presented in the accompanying *Results of Procedures*.

We were not engaged to, and did not conduct an audit of the CSP grant, the objective of which would be the expression of an opinion on ABC Charter School's compliance with the requirements of the CSP grant. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the use of ABC Charter School and the Nevada Department of Education. However, once the audit is completed, the audit is a public record and its distribution is not limited.

CPA Signature  
Date



## **APPENDIX B**

Please see APPENDIX B Posted at the following location:

[http://www.doe.nv.gov/Boards\\_Commissions\\_Councils/CharterAuditCommittee/Charter\\_Audit\\_Committee/](http://www.doe.nv.gov/Boards_Commissions_Councils/CharterAuditCommittee/Charter_Audit_Committee/)

## **School Closeout Procedures**

**Purpose:** The purpose is to provide standard procedures for closing a school when the charter has been revoked. The procedures indicated may be supplemented by procedures determined relevant based on the auditors professional judgment or additional procedures required by the Board or by the Department of Education (NDE).

**Note: the audit closeout period should be determined by the auditor in consultation with NDE.**

### **Responsibilities:**

#### School management/board of trustees:

- Develop control procedures to properly safeguard assets;
- Designate an individual who is responsible for the accuracy and timeliness of the closeout process;
- Assign a Trustee or authorize another individual to perform the disbursement of any funds;
- Providing an accurate accounting of the school's federal and state grants;
- Providing an accurate accounting of all financial activities of the school through the agreed upon audit period; and
- Take an accurate inventory of assets held at the audit period end date and properly account for any assets sold after the notice of the charter revocation has been received

#### In certain situations, the Nevada Department of Education may:

- Determine the audit period and timing
- Coordinate with the charter school regarding the school's hiring the CPA to perform the closeout audit

#### Auditors:

- Render an opinion on the financial statement of the school
- Issue a report in accordance with Government Auditing Standards on the school's internal control over financial reporting and on tests of compliance with certain laws, provisions, regulations, contracts, grant agreements, and other matters
- If applicable, issue a report on in accordance with OMB Uniform Guidance

**Compliance Requirements Applicable to Closeout Audits**

*2000 Compliance Requirements*

The compliance requirements identified below have been developed by the NDE as being inherently risky and highly susceptible to non-compliance. The audit procedures associated with these compliance requirements are intended to be illustrative and are not to be considered comprehensive. The design of appropriate audit tests to satisfy these requirements should be based upon the auditors' professional judgment.

*2001 Internal Controls*

In accordance with the Department's charter school regulations the charter school, under the direction of the board of trustees, is required to establish and maintain adequate accounting records and internal control procedures. A charter school receiving federal financial assistance must adhere to the internal control requirements contained in OMB Circular A-87, Cost Principles for State, Local, and Indian Tribal Governments (amended May 10, 2004). Auditors should consult the compliance supplement for OMB Uniform Guidance for more information concerning specific internal control requirements, if applicable.

Internal control should consist of the following five components: control environment, risk assessment, control activities, information and communication and monitoring. The objectives of internal control relate to proper financial reporting, efficient operations and compliance with grant and management requirements.

Prior to reviewing and evaluating internal control the auditor should review the AU Section 314 Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatements the 2011 revision of the Government Auditing Standards.

*Recommended Audit Procedures:*

- Review and determine if written internal control policies are available.
- Assess the adequacy of the internal controls in accordance with AU 314 and the OMB Super Circular, if applicable.
- Assess the adequacy of the internal controls pertaining to compliance requirements for OMB Uniform Guidance, if applicable.

*2002 Record Keeping*

In accordance with the Department's charter school regulations the charter school is required to maintain their financial system and records in accordance with accounting principles generally accepted in the United States of America. Financial books and records of the charter school must reflect the source of all assets, liabilities, net position, revenues, and expenses recorded during the fiscal year.

*Recommended Audit Procedures:*

- Determine whether the charter school maintains a financial system of recording and documenting all financial transactions.
- Review supporting documentation for selected transactions during the audit to determine if they are properly supported.

2003 *Related Party Disclosure*

In accordance with the State of Nevada *Recommended Fiscal Policies and Procedures Guide*, charter school in the State of Nevada will follow NRS Chapter 281A, the conflict of interest law. The charter school may not be operated for the benefit of an affiliated or unaffiliated organization or an individual in his or her own private capacity or individuals related to the charter school or members of its management. The charter school must have an arms-length relationship with all affiliated or unaffiliated organizations or with a private or related individual(s), particularly when agreements exist with the other entities.

*Recommended Audit Procedures:*

- Review and become familiar with the requirements and recommendations as codified in the AICPA Statement of Auditing Standards, FASB Accounting Standards Codification 850 *Related Party Disclosures*, *Government Auditing Standards* and the requirements of NRS Chapter 281A, conferring with the Nevada Commission on Ethics Staff as necessary.
- Obtain a listing of the related party transaction that occurred during the year whether material or not.
- Determine if each member of the board has been approved by the Superintendent of Public Instruction and has filed an annual financial disclosure form consistent with NRS 281.571 if required by contract.
- Determine if the building is leased from a related party. If so, determine if the rent paid is the market rate for the area.
- Obtain representation from management and the board of trustees as to whether they or any other related party engaged in any transactions with the charter school during the year and disclosed **all** the required transactions in the accompanying notes to the financial statements.

2004 *Board of Trustees*

In accordance with NRS 388A.366, the charter school shall conduct public meetings under NRS 241.

*Recommended Audit Procedures:*

- Become familiar with Chapter 241 of the Nevada Revised Statutes, consulting with the Office of the Attorney General's open meeting law manual and published decisions as needed.
- Examine evidence and determine that public meetings were properly conducted in accordance with the above requirements.

- Determine that the board members are current on the required document submissions by obtaining a report from the Board Member Management System.

2005 *Nevada Public Employees Retirement System (PERS)*

In accordance with Nevada Administrative Code 286, employees of a charter school are considered a public employee and charter schools are required to contribute to the Public Employees Retirement System for their retirement. However, employees of Educational Management Organizations may not be required to be members of PERS.

*Recommended Audit Procedures*

- Review and become familiar with Nevada Administrative Code 286 business practices.
- Determine by selecting a sample of employees that eligible employees are contributing to the plan and the appropriate percentage of their salary is being withheld.
- Examine evidence that eligible employees are enrolled in PERS and that payroll deductions are being withheld and remitted to PERS on a monthly basis.
- Determine the extent of any outstanding payments owed to PERS by the charter school.

2006 *Charter School End of Year Financial Report*

The charter school is required to submit a *Charter School End of Year Financial Report (CSEOYFR)* to the Department following its fiscal year end (See Section 900). The Department has developed a standard reporting format for the *CSEOYFR*. The *Recommended Audit Procedures* listed below should be applied to the report submitted for the previous fiscal year end. (i.e., as part of the fiscal year 2016 audit, the *CSEOYFR* report for the year ended June 30, 2015 will be examined).

*Recommended Audit Procedures*

- Determine if the financial information was prepared on the modified accrual basis of accounting.
- Trace the amounts reported to the audited financial statements and verify agreement or perform alternative procedures to verify the accuracy and completeness of the amounts reported.
- Test mathematical accuracy of the schedules and supporting worksheets.
- For financial data, review accounting records and ascertain if all applicable accounts were included in the schedules.
- Obtain written representation from management that the reports are the actual copies submitted to the Department and contain accurate data.

## 2007 *Closeout Procedures*

The following procedures are to be performed when a school's charter has been revoked to ensure that assets are properly safeguarded and the Government's interest is properly protected.

- Obtain the contact information of the individual or entity appointed by the Board of Trustees as responsible for the accuracy and timeliness of the closeout process;
- Obtained the contact information of the individual or entity appointed by the Board of Trustees for the dissolution of any remaining assets;
- Closeout date and audit period agreed upon with the Department;
- Examine final grant reports for all federal and state grants and determine if reports have been submitted and if so, any excess funds received and not expended were properly accounted for or remitted to the funding source;
- Review plan for disposition of assets and determined if has been reviewed by the board of trustees and approved by the Department;
- Review listing of assets sold and determine if funds properly received and deposited;
- Review a sample of disbursements made subsequent to revocation of the charter and determine if payments were properly authorized and prioritized;
- Determine that all related tax filing (W-2's, 1099's) were prepared
- Determine that all related payroll liabilities, inclusive of salaries, payroll accruals, MTRS payments and accrued vacation were properly identified and accounted for in the closing year.
- Obtain listing of payables and related party debt and confirm all payables greater than \$1,000;
- Determine that the board authorized an individual, or entity to maintain student and school records inclusive of payroll records (10 years), student records (60 years);
- Determine that the school has procedures in place to properly ensure the confidentiality of the student records and personnel files;
- Determine if any cash on hand at the end of the audit period that they have been transferred to the Department or the designated receiver to determine appropriate distribution based on approval by the Department; and
- Determine that the Board of Trustees established a separate checking account with an amount of funds set aside, as determined in consultation with the Department, for final legal, accounting, audit, and any other necessary expenses.

## APPENDIX D

The following information from *GASB Codification Section 2600* should be considered when determining the proper treatment for charter schools with component units:

**Component unit defined** – Organizations that are legally separate organizations from the PG for which the primary government is financially accountable or closely related. In addition, other legally separate organizations where the nature and significance of their relationship with the primary government is such that exclusion of the organization from the reporting entity would cause the reporting entity’s financial statements to be misleading are considered component units.

The PG is financially accountable if:

- 1) The primary government appoints a voting majority of the organizations governing board and:
  - i. Is able to impose its will on the organization and/or
  - ii. Is in a relationship of financial benefit or burden with the organization
- 2) The organization is fiscally dependent upon the primary government and the PG is in a relationship of financial benefit/burden with the PG

Organization is fiscally dependent if the primary government must

- Approve the organizations budget
- Approve the organizations levy, tax rates or other charges
- Approve organizations debt

Organization has a financial benefit/burden relationship if any one of the following occurs:

- PG is legally entitled to or can otherwise access the organization’s resources
- PG is legally obligated or has otherwise assumed the obligation to finance the deficits of, or provide financial support to the organization

- 3) PG is obligated Financial statements will be misleading if excluded

Entities that do not meet the financial accountability criteria may still be included as a component unit if they are closely related to or are financially integrated with the PG. Determination is based on professional judgment, given the nature, facts and circumstances and significance of the relationship between the PG and the component unit.

- in some manner for the organization’s debt

## Reporting Requirement

A legally separate, tax exempt organization should be reported as a component unit of the School if all of the following criteria are met

- The economic resources received or held by the separate organization are entirely or almost entirely for the direct benefit of the PG
- The PG is entitled to, or has the ability to otherwise access a majority of the economic resources received or held by the organization
- The economic resources received or held by the organization that the PG is entitled to or has the ability to otherwise access, are significant to the PG



**Financial Framework Information Worksheet**

Enter the required data into the highlighted cells for items 1 thru 21

1.	School name		
2.	School Year Ended		(YYYY)
3.	Year of Operation		
4.	Independent Auditor		
5.	Cash		
6.	Current Assets		
7.	NonCurrent Assets		
8.	Deferred Outflows		
9.	Current Liabilities		
10.	NonCurrent Liabilities (Net of PERS pension liability)		
11.	PERS Pension Liability		
12.	Deferred Inflows		
13.	Revenues		
14.	Expenditures		
15.	Annual Principal		
16.	Interest Expense		
17.	Depreciation Expense		
18.	Outstanding Loan		(Yes or No)
19.	Debt Default		(Yes or No)
20.	Actual Enrollment		
21.	Projected Enrollment		