Shoreham Wading River Central School District

Internal Audit Report on
Grants Administration
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Report on Internal Controls Related to Grants Administration

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Board of Education  
Shoreham-Wading River Central School District  
250b Route 25A  
Shoreham, New York 11786

We have been engaged by the Board of Education (the “Board”) of the Shoreham-Wading River Central School District (the “District”) to provide internal audit services with respect to the District’s internal controls related to grants administration for the period July 1, 2020 through May 31, 2021.

The objectives of the engagement were to evaluate and report on the District’s internal controls pertaining to grants administration and to test for compliance with laws, regulations, and the District’s Board policies and procedures.

In connection with the following procedures, we have provided findings and recommendations for the internal controls related to grants administration. Our procedures were as follows:

- Reviewed applicable District policies, procedures, and practices with regards to grants administration;

- Reviewed grant allocations, carryover funds, and total expenditures for the District’s federal grants, and verified the District spent at least 85% of the current year grant allocation, the District’s carryover to the subsequent grant year represented no more than 25% of the current year grant allocation, and the District’s remaining grant funds did not exceed the allowable carryover into the subsequent grant year;

- Tested, on a sample basis, grant expenditures to verify expenditure was an allowable cost as per the Uniform Guidance, charged to the proper period, properly authorized, followed the District’s purchasing policy, and was recorded and accurately coded in the AIS;

- Tested a sample of employees whose salaries were charged to federal grants to verify the District had payroll certifications on file, in accordance with the Uniform Guidance, to substantiate the amount of time spent on the federal grant and that the salary was charged to the grant in the proper period and coded correctly;

- Tested, on a sample basis, grant revenues to verify grant payments made by the Office of the State Comptroller to the District from the OSC Payment Information Inquiry Report to verify payments received were properly recorded in the AIS;
• Obtained the District’s *Final Expenditure Report for a Federal or State Project* (“FS-10-F”), *Proposed Budget for a Federal or State Project* (“FS-10”), and the *Proposed Amendment for a Federal or State Project* (“FS-10-A”) for the District’s federal grants filed with the Grants Finance Unit to verify the FS-10-F forms agreed to the expenditures recorded in the District’s AIS, and the FS-10 and FS-10-A forms (as applicable) agreed to the budget recorded in the District’s AIS;

• Reviewed the maintenance of effort calculations (MOE) provided to NYSED by the District to verify the budgeted and actual expenditures, allocation of state and local expenditures, fringe benefits, and child counts reported on the amounts tab of the calculation agreed to related supporting documentation, and the District was in compliance with level of effort/maintenance of effort requirements per the MOE tab of the calculation;

• Reviewed the District’s Title I Consolidated Application to verify that the District properly determined what school attendance areas were eligible for Title I funding and properly allocated funding to those school attendance areas;

• Tested a sample of students who left the District, either by transfer to another outside District or departure from the country, to verify that the District is obtaining and maintaining formal written documentation for all transferred students who are allowed to be removed from the District’s cohort for the purpose of the high school graduation rate calculation;

• Reviewed correspondence with private schools located within the District, or which were attended by District residents, to verify the District has consulted with private school officials regarding participation in the Title I, II, III, and IV grants and, for schools that did not decline participation, reviewed program expenditures and other records to determine that the services that were planned for private school children were provided and that the funds for private school children were available and set aside prior to allocating funds to the District level areas.

The results of our procedures are presented on the following pages.

Our procedures were not designed to express an opinion on the internal controls related to grants administration, and we do not express such an opinion. As you know, because of inherent limitations of any internal control, errors or fraud may occur and not be prevented or detected by internal controls. Also, projections of any evaluation of the accounting system and controls to future periods are subject to the risk that procedures may become inadequate because of changed conditions.

We would like to acknowledge the courtesy and assistance extended to us by personnel of the District. We are available to discuss this report with the Board or others within the District at your convenience. This report is intended solely for the information and use of the Board, the Audit Committee, and the management of the District and is not intended to be and should not be used by anyone other than those specified parties.

Very truly yours,

R.S. Abrams & Co., LLP
May 25, 2021
FEDERAL AND STATE GRANTS OVERVIEW

The New York State Education Department ("NYSED") offices, in conjunction with the Grants Finance Unit, administer state and federal grant programs. The Grants Finance Unit is responsible for the financial management of grants awarded to local agencies. Various other NYSED offices are responsible for ensuring that the activities funded by the grants are planned and implemented properly.

Federal and state grant programs follow annual funding cycles, however there are significant differences between the state and federal funding calendars. In order to manage local grants projects effectively and identify expenditure and carryover funds on a local and statewide basis, most federal grants are awarded annually. Grants are funded on either a school year basis of September 1 through August 31, or a fiscal year basis of July 1 through June 30.

In order to be eligible for state and federal grants, the District is required to prepare a budget for each grant, which must be submitted to the Grants Finance Unit for approval. These budgets may be amended throughout the year. Amendments may be used to increase or decrease the budget, or to reallocate funds within the budget. Budget amendments are subject to the approval of the Grants Finance Unit.

We reviewed the following federal grants received by the District:

- **Title I Grants to Local Educational Agencies** – Provided under the *Elementary and Secondary Education Act* ("ESEA"), as amended by the *Every Student Succeeds Act of 2015* ("ESSA"), to provide academic resources underperforming children in meeting challenging state academic standards;

- **Supporting Effective Instruction State Grants (Title II Part A)** – Provided under ESEA, as amended by the ESSA, to improve and promote teacher and principal quality through training;

- **English Language Acquisition State Grants (Title III English Language Learners)** – Provided under ESEA, as amended by the ESSA to help ensure that children with limited English proficiency attain English proficiency at high levels in core academic subjects to meet state mandated achievement performance standards;

- **Student Support and Academic Enrichment Grants (Title IV)** – Provided under ESEA, as amended by the ESSA, to improve students' academic achievement by increasing the capacity of educational agencies to provide students with access to a well rounded education, improve conditions for learning, and improve the use of technology to impact academic achievement and digital literacy;

- **IDEA Section 611** – Provided under the *Individuals with Disabilities in Education Act* ("IDEA") for school-age children with disabilities; and

- **IDEA Section 619** – Provided under the IDEA for preschool children with disabilities.
GOVERNANCE

During our review of the Board of Education policy manual, we noted that the District has adopted a comprehensive set of policies relating to federal and state grants including, but not limited to, the following:

**Parent and Family Engagement**
District policy No. 8260, *Title I Parent and Family Engagement*, establishes the procedures for involving parents of students receiving Title I services or participating in Title I programs. These procedures include training opportunities for parents and family members to work with their children at home, an annual meeting for parents and family members of participating students, and enlisting support and participation of parents and family members in instruction.

**Children with Disabilities & Students with Disabilities Participating in School District Programs**
The District’s policies No. 7611, *Children with Disabilities* and No. 7620 *Students with Disabilities participating in School District Programs* establishes that students with disabilities residing in the District, including those of preschool age, will be provided with full access and opportunity to participate in School District programs, including nonacademic and extracurricular programs and activities that are available to all other students enrolled in public schools of the District. The policies list the steps that will be taken to ensure the provision of appropriate public education to all eligible students with disabilities. These steps include, but are not limited to; ensuring the necessary accommodations are specified on individualized education program (IEP) and implemented in accordance with the IEP, reviewing the need for accommodations at Committee on Special Education (CSE) evaluations/re-evaluations, providing for the education of students with disabilities with non-disabled peers to the extent appropriate, education in regular classes with or without support services, education in a resource room, education for part of the day in a special class, full time education in a special class, home instruction and education in a residential setting.

**Preschool Special Education Program**
The District’s policy No. 7614, *Preschool Special Education Program*, establishes and provides guidance to ensure the timely evaluation and placement of each preschool child with a disability residing in the District so the child has the opportunity to participate in preschool programs, establishes a Committee on Preschool Special Education (CPSE) which will be comprised in accordance with applicable federal and state law and regulation, and ensures that parents have received and understand the request for consent for evaluation and re-evaluation of a preschool aged child.

**Student Records: Access and Challenge & Student Individualized Education Program (IEP): Development and Provision**
District policy No. 7240, *Student Records: Access and Challenge*, and No. 7640 *Student Individualized Education Program (IEP): Development and Provision* details the importance of ensuring the confidentiality of personally identifiable data pertaining to a student with a disability. The policy states, that the District will comply with the provisions of the Family Educational Rights and Privacy Act of 1974 (FERPA). Under its provisions, parents or guardians and noncustodial parent(s) whose rights are not limited by court order or formal agreement, of a student under 18, or a student who is 18 years of age or older, or who is attending an institution of post-secondary education, have a right to inspect and review any education records maintained...
by the District. The policy further details exceptions where the District may release a student’s information or records when it is permitted by FERPA.

**Alternative Formats for Instructional Materials**

District policy No. 5412, *Alternative Formats for Instructional Materials*, recognizes the Board’s responsibility to ensure instructional materials are made available in a usable alternative format for students with disabilities. The policy states that the District will ensure that curriculum materials are available in a usable alternative format for students with disabilities and that the District will ensure that each student who requires instructional materials in an alternative format will receive it in a timely manner.

**GRANTS ADMINISTRATION**

Based upon our interviews and observations, we noted the procedures for grants administration to be as follows:

**Overview**

Each grant has a designated Grant Administrator that is responsible for overseeing the grant. The Director of Special Education and Pupil Personnel administers the IDEA (611 and 619) grants and the Assistant Superintendent for Curriculum and Instruction administers the Title I, Title II, and Title IV grants. The District participates in the Eastern Suffolk Boces Title III consortia to assist in administering the New Language and World Languages Title III grants.

**Proposed Budget Reports**

A *Proposed Budget for a Federal or State Project* ("FS-10") form is completed for each grant by the District Treasurer and the applicable Grant Administrator. The Grant Administrator writes a program narrative that describes the target population, the project objectives, the activities that will be employed to facilitate the achievement project objectives, and how the results of the project will be measured. A budget narrative is also required to provide information on the applicant’s financial plan for carrying out the project. The Superintendent reviews and approves the completed FS-10s, which are then submitted to the Grants Finance Unit along with any applicable narratives.

Once the FS-10 has been approved by the Grants Finance Unit, an approved copy of the FS-10 and the project status report are mailed to the Grant Administrator. When the approved copy of the FS-10 is received by the District, the grant budget is recorded in the District’s Accounting Information System (“AIS”) by the District Treasurer.

**Budget Amendments**

Certain types of changes to a project or budget require the Grant Administrator to request prior approval from the Grants Finance Unit. For example, in the event the District files the *Final Expenditure Report for a Federal or State Project* ("FS-10-F") for the prior grant year after the FS-10 for the current grant year has been approved and there are rollover funds from the prior grant year, the District may need to amend the budget for the current grant year. Amendments need to be prepared and submitted to NYSED in advance for incurring obligations or expenditures if the line item has not been budgeted and the District wishes to spend funds from the particular line item or if the incurring expenditures will exceed the allowable budget amount. The *Proposed Amendment for a Federal or State Project* ("FS-10-A") is used to submit requests for budget changes that require prior approval as follows:
- Personnel positions, number and type;
- Equipment items having a unit value of $5,000 or more, number and type;
- Minor remodeling;
- Any increase in a budget subtotal by more than 10% or $1,000, whichever is greater; and
- Any increase in the total budget amount.

**Encumbrances**

All encumbrances must be made within the approved funding period of the grant. Costs encumbered outside the project dates will not be reimbursed on the FS-10-F. The effective date of the encumbrance varies based on the type of purchase. For example, an encumbrance for the cost involving the performance of work other than personal service is made on the date on which the grantee makes a binding written commitment to obtain the work.

**Expenditures**

Purchase orders and related invoices that utilize grant budget codes need to be reviewed and approved by the Grant Administrator, to ensure expenses charged to the grant are allowable costs that are appropriate and consistent with the objectives and regulations of the grant. The Grant Administrators remain current on grant regulations through guidance provided by NYSED and the Federal government.

**Debarment and Suspension**

*Executive Order 12549* states that grantees cannot award another party who is debarred or suspended from any involvement in federal/state assistance programs. Additionally, grantees need to submit a *Certification of Non-Debarment, Non-Suspension* with the federal grant application which should be signed by the applicable subcontractors.

**Property Management**

Personal property with a useful life of more than one year and a cost of $5,000 or more is defined as equipment under NYSED grants. Capital outlay purchased by the grantee will remain with grantee for the grant period. However, NYSED has the right to transfer capital outlay items for non-compliance during the project period or as needed at the end of the grant period.

**Direct Costs**

Direct costs are costs that are identified with an expense item. Direct costs generally include costs for personnel who perform fiscal and reporting work related to the grant, costs for contracted services, costs for supplies, and materials for administrative usage. Other costs include other operating costs and equipment requests for administrative purposes.

**Indirect Costs**

Indirect costs are costs of activities that benefit more than one program or objective and cannot be readily assigned to only one specific program or objective. Indirect costs are generally classified as costs of operating and maintaining facilities, general administration, and general expenses such as budgeting and accounting. Other indirect costs include centralized services and personnel and accounting administration. A notification letter is sent annually to each school district when the rates are calculated. NYSED calculates the indirect cost rate for school districts using the data reported on the State Aid Annual Financial Report (“ST-3”) using a methodology approved by NYSED.
Payroll Certifications
Employees who work on federal awards are required to complete payroll certifications to substantiate time and effort. According to the Uniform Guidance, costs of compensation are allowable to the extent that they are reasonable for the services rendered and conform to the established written policy of the non-federal entity. Documentation of personnel expenses must be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated. Such documentation must support the distribution of the employee’s salary or wages if the employee works on more than one federal award, a federal award and non-federal award, an indirect cost activity and a direct cost activity, two or more indirect activities allocated utilizing different allocation bases, or an unallowable activity and a direct or indirect activity. In addition, the support of charges for the salaries and wages of nonexempt employees must also indicate the total number of hours worked each day.

Requesting Funds
The Request for Funds for a Federal or State Project (“FS-25”) is used to request funds for an approved grant. The FS-25 forms for all grants are prepared by the District Treasurer, and are based on expenditures recorded in the AIS. The District may only request as much cash as is necessary to meet the immediate needs of a grant project; and must minimize the time between receipt of the funds and disbursing them for grant activities. Only requests for funds including actual expenditures to date plus anticipated expenditures for the next month will be accepted. Payments totaling up to 90% of a grant’s budget may be requested through this process. The Treasurer in the business office prepares the FS-25’s on a mid-year basis. The FS-25s are reviewed by the Grants Administrator prior to submission.

Grant Payments
The Office of the State Comptroller submits payments to the grantees via electronic deposit directly to the grantee’s bank account with the respective party notified by email of the electronic deposit. Interest earned on cash advances from federal grants can be kept up to $100 of administrative expenses annually. Interest earned on cash advances that exceeds $100 is required to be returned to the federal government through New York State. The applicable interest over $100 cannot be utilized to offset any direct or indirect program costs. Payments are wired from the Office of the State Comptroller (“OSC”) directly to the District’s federal fund bank account.

Final Expenditure Reports
FS-10-F forms for state projects are due to the Grants Finance Unit within 30 days following the end of the grant, and FS-10-F forms for federal projects are due within 90 days following the end of the grant. For the District’s Title and IDEA grants the FS-10-F forms are prepared by the Treasurer in the business office. All completed FS-10-F forms are reviewed by the respective Grants Administrator for accuracy, and approved by the Superintendent prior to submission to the Grants Finance Unit.

A review of each final expenditure report is conducted by the Grants Finance Unit to determine the reimbursable expenditures of the project. After review by the Grants Finance Unit, a copy of the FS-10-F is sent to the Grant Administrator and any funds owed to the District will be reimbursed. If the review results in an overpayment to the District, the amount overpaid will be transferred to another of the District’s eligible grants, if possible, and a Notice of Overpayment (“FS-80”) will be sent to the District. The notice will identify the grant that was overpaid, the amount overpaid, and the grant charged for overpayment, or it will instruct the District to submit
a refund check if there are no eligible open grants or grant contracts. Additionally, funds should be expended according to the approved budget and obligations should occur before the project end date. Non-compliance may result in detailed expenditure reporting requirements and return of funds to NYSED or termination of the grant.

**OMB UNIFORM GUIDANCE FOR FEDERAL AWARDS - KEY CHANGES**

Recent changes applicable to the OMB Uniform Guidance for federal awards were established to promote the streamlining of OMB Circulars, to change the administrative guidelines and cost principles to allow for a greater level of judgment and more reliance on the District’s internal control systems, and to help to lower the audit burden.

*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, ("Uniform Guidance"), effective for new federal awards, and changes to funding increments with changed term and conditions issued after December 26, 2014, contains significant changes to the procurement rules for federal awards.

The procurement standards are contained in sections 200.317 through 200.326 of the Uniform Guidance and emphasize a heavy reliance on written documentation that must be maintained, including specific policies and procedures.

**General Requirements**

In general, the Uniform Guidance key requirements include (but are not limited to) the following for non-federal entities receiving federal awards:

- Written procurement policies must be developed and follow the Uniform Guidance as well as all state and local regulations (provided they do not conflict with federal laws or the Uniform Guidance).
- Written standards of conduct regarding conflicts of interest must state that no employee, officer or agent may participate in the selection, award or administration of a contract supported by a federal award if he or she has a conflict of interest, either real or apparent. The standards must include the disciplinary actions that will be applied for any violations of the standards.
- Purchases must avoid unnecessary or duplicative items and the use of shared services agreements and state and local intergovernmental agreements, where appropriate, are encouraged in order to foster greater efficiency and cost-effectiveness.
- Contracts must be awarded only to responsible contractors and take into consideration the integrity of the contractor, past performance, and financial and technical resources. In addition, the non-federal entity must maintain proper oversight to ensure the contractor is performing in accordance with the terms and conditions in their contracts and/or purchase orders.
- Documents must be maintained which detail the procurement history including the rationale for the method of procurement (discussed below), contract type, contractor selections or rejection, and the basis for the contract price.
- Full and open competition must be conducted. This precludes any contractor who participated in drafting specifications, requirements, invitations for bids or request for proposals from competing for the procurement. It also limits certain unreasonable requirements in the bids or request for proposals that are meant to limit competition,
prohibits the use of geographic preferences in evaluating bids or proposals but provides certain exceptions, and requires that any prequalified lists be kept current.

**Required Methods of Procurement**

Non-federal entities must use the following five procurement methods described in the Uniform Guidance:

- **Micro-purchases** – purchases of supplies or services where the aggregate value does not exceed $3,000 (now increased to $10,000 as discussed below). These may be awarded without obtaining competitive quotes if the entity deems the price reasonable, and should be distributed among qualified suppliers, if practical.

- **Small Purchases** – simple and informal method for procuring services, supplies, or other items, that do not exceed the simplified acquisition threshold of $150,000 (now increased to $250,000 as discussed below). Price or rate quotes must be obtained from an adequate number of qualified sources. The number of qualified sources, as well as the method of obtaining the quote (whether in writing, verbal, website pricing, or search engine, etc), is left at the discretion of the non-federal entity, to be included in their policy.

- **Sealed Bids** - Used for purchases over the simplified acquisition threshold now at $250,000, where publicly solicited bids are obtained and a fixed price contract is awarded to the responsible bidder who conformed to the terms and conditions and is the lowest price. This is normally associated with construction contracts.

- **Competitive Proposals** - Used for purchases over the simplified acquisition threshold now at $250,000, whereby publicly advertised requests for proposals are conducted (which identify all evaluation factors and their importance), and a fixed price or cost-reimbursement type contract is awarded. Competitive proposals are used when sealed bids are not appropriate. Contracts are awarded not just based on price, but where the firm’s proposal is most advantageous to the program.

- **Noncompetitive Proposals** - This is procurement through a sole source, which is limited to specific instances such as when the item is only available from one source, a public emergency where the delay caused by competitive solicitation would not be permitted, the federal awarding agency or the pass-through entity such as New York State Education Department has expressly authorized it based on a written request from the non-federal entity, or after failing to get a required number of responses from competitive solicitation.

As mentioned above, when the Uniform Guidance was originally issued, it included a micro-purchase threshold of $3,000. It also included a simplified acquisition threshold (to be used for small purchases) of $150,000. The simplified acquisition threshold is set by Federal Acquisition Regulations, but is periodically adjusted. In June of 2018, the Office of Management and Budget (OMB) issued a memorandum entitled “Implementing Statutory Changes to the Micro-Purchase and the Simplified Acquisition Thresholds for Financial Assistance”. It details how the federal government increased the micro-purchase threshold for all recipients of federal awards to $10,000, and the simplified acquisition threshold to $250,000. Normally these changes are not effective until they are codified in the federal regulations and Uniform Guidance. However, OMB has granted an exception for these thresholds, and recipients of federal awards may update their internal controls, and policies and procedures using the higher amounts, as of the date of the memo, June 20, 2018.
FINDINGS AND RECOMMENDATIONS

Based on our inquiries, observations, and detailed testing, we provide our findings and recommendations to further strengthen the District’s internal controls relating to grants administration.

It should be noted that these recommendations are provided to the District to assist management in improving the District’s controls relating to grants administration. It is important to note that our observations and recommendations are directed toward improvement of the system of internal controls and should not be considered a criticism of, or reflection on, any employee of the District.

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Policies and Procedures

Procedure Performed: We reviewed the District’s policies and procedures to determine whether the District has adopted the written policies and procedures recommended by NYSED surrounding the administration of federal funds.

Findings: We noted that although the District adopted all legally required policies outlined by the New York State School Boards Association, there are instances where District policies do not explicitly include information in conformity with applicable laws and code.

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Grants Utilization

Procedures Performed: We reviewed grant allocations, carryover funds, and total expenditures for the District’s IDEA 611, IDEA 619, Title I, Title II, Title III Immigrant, Title III English Language Learner, and Title IV grants for the 2018-2019 grant year, and verified the following:

- The District spent at least 85% of the current year grant allocation.
- The District’s carryover to the subsequent grant year represents no more than 25% of the current year grant allocation.
- The District’s remaining grant funds did not exceed the allowable carryover into the subsequent grant year.

Finding: We noted instances where the District did not spend at least 85% of current year grant allocations and the District’s carryover to the subsequent grant year exceeded more than 25% of the current year’s grant allocation.
Compliance with Allowable Costs

Procedures Performed: We obtained a sample of five federal grant expenditures to verify the following:

- The expenditure charged was an allowable cost as per the Uniform Guidance.
- The expenditure was charged to the proper period.
- The expenditure was properly authorized and followed the District’s purchasing policy.
- The expenditure was properly recorded and coded in the AIS.

Finding: No exceptions were noted as a result of applying these procedures.

Payroll Compliance

Procedures Performed: We reviewed a sample of payroll transactions for forty employees whose salaries were charged to federal grants to verify the following:

- The District had payroll certifications on file to substantiate salaries charged to grants in compliance with the Uniform Guidance.
- The employee’s salary was charged to the grant in the proper period and coded correctly.

Findings: No exceptions were noted as a result of applying these procedures

Cash Receipts

Procedures Performed: We selected a sample of grant payments made by the OSC to the District from the OSC Payment Information Inquiry Report for 2020-2021 to verify payments received were properly recorded in the AIS.

Finding: No exceptions were noted as a result of applying these procedures.

Grants Accounting

Procedures Performed: We obtained the District’s FS-10, FS-10-A, and FS-10-F forms for the 2018-2019 school year, filed with the Grants Finance Unit for Title I and IDEA to verify the following:

- The FS-10-F forms agreed to the expenditures recorded in the District’s AIS.
- The FS-10 and FS-10-A forms (as applicable) agreed to the budget recorded in the District’s AIS.
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Finding: No exceptions were noted as a result of applying these procedures.

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Maintenance of Effort

Procedures Performed: We reviewed the maintenance of effort calculations (MOE) provided to NYSED by the District for the 2019-2020 compliance standard and verified the following:

- Actual expenditures, allocation of state and local expenditures, fringe benefits, and child counts reported on the amounts tab of the calculations agreed to related supporting documentation.
- The District was in compliance with level of effort/maintenance of effort requirements per the MOE tab of the calculation.

Finding: No exceptions were noted as a result of applying these procedures.

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Eligibility

Procedures Performed: We reviewed the District’s Title I Consolidated Application for the 2020-2021 school year to verify that the District properly determined what school attendance areas were eligible for Title I funding and properly allocated funding to those school attendance areas.

Findings: No exceptions were noted as a result of applying these procedures.

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High School Graduation Rate

Procedures Performed: We selected a sample of students who left the District during the period from July 1, 2020 through April 20, 2021 either by transfer to another outside District or departure from the country to verify that the District is obtaining and maintaining formal written documentation for all transferred students who are allowed to be removed from the District’s cohort for the purpose of the high school graduation rate calculation.

Finding: No exceptions were found as a result of applying these procedures.

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Private School Participation

Procedures Performed: We selected a sample of five private schools from the District’s Consolidated Application for ESSA funding Programs, and obtained supporting documentation to verify the District has consulted with private school officials regarding participation in the Title I, II, III, and IV grants for the 2020-2021 school year. For schools that did not decline participation, we reviewed program expenditures and other records to determine that the services
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that were planned for private school children were provided and that the funds for private school children were available and set aside prior to allocating funds to the District level areas.

Finding: No exceptions were found as a result of applying these procedures. All private schools declined participation in the Title I, II, III, and IV grants.

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Corrective Action Plan

The District is required to prepare a corrective action plan in response to any findings contained in the internal audit reports. As per Commissioner’s Regulations §170.12, a corrective action plan, which has been approved by the Board, should be submitted to the State Education Department within 90 days of the receipt of a final internal audit report.

The approved corrective action plan and a copy of the respective internal audit report should be submitted using the NYSED Business Portal.