FINANCIAL STATEMENTS AND REPORT OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS

June 30, 2012

$C \ O \ N \ T \ E \ N \ T \ S$

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Management's Discussion and Analysis For the year ended June 30, 2012

Our discussion and analysis of the Frankfort-Elberta Area Schools' (the "School District") financial performance provides an overview of the School District's financial activities for the fiscal year ended June 30, 2012. Please read this analysis in conjunction with the School District's financial statements, which immediately follow this section.

Description of Reporting Entity and Services Provided

Frankfort-Elberta Area Schools, located in Frankfort, Michigan in Benzie County, is nestled on the shores of Lake Michigan, 45 miles west of Traverse City. The school population for the 2011-2012 school year is approximately 525 students who are eager to learn. Twenty percent of the students in the School District are "Schools of Choice" coming from Benzie Central, Bear Lake, and Traverse City Area Public Schools. Because of small class sizes, students are given more individual attention in the classroom. Educators are dedicated and caring and always look out for the student's best interest. MEAP and standardized test scores are consistently above average. The community has been extremely supportive over the years and parents are very involved in the schools in a positive way whether it is fund raising, volunteering in the classrooms, or attending the many events at the school. Frankfort-Elberta Area Schools boasts outstanding athletic, drama and music programs that allow students to learn outside of the classroom.

Overview of the Financial Statements

This annual report consists of three sections presented in the following order: Management's discussion and analysis, the basic financial statements, and required supplementary information. The basic financial statements include two kinds of statements that present different views of the School District:

- The first two statements are *district-wide financial statements* that provide comprehensive *short-term* and *long-term* financial information about the School District as a whole.
- The remaining statements are *fund financial statements* that focus on *individual parts* of the School District, reporting the School District's operations *in more detail* than the district-wide statements.
- The *governmental funds* statements tell how *basic* services like regular and special education were financed in the *short-term* as well as what remains for future spending.
- *Fiduciary funds* statements provide information about assets held by the School District in a *trustee* or *agent* capacity.

The financial statements also include notes that explain some of the information in the statements and provide more detailed data and supporting documentation. The statements are followed by a section of required supplementary information that further explains and supports the financial statements with a comparison of the School District's budget for the year. Figure A-1 shows how the various parts of this annual report are arranged.

Figure A-1

District Financial Report Organization

Management's Discussion and Analysis (MD&A) (Required Supplemental Information)

Basic Financial Statements

District-wide Financial Statements/Fund Financial Statements

Notes to Basic Financial Statements

Budgetary Information for Funds (Required Supplemental Information)

Other Supplemental Information

District-Wide Statements

The district-wide statements provide comprehensive information about the entire School District using the accrual basis of accounting, which is similar to the method used by private-sector companies. The statement of net assets includes all of the School District's assets and liabilities and the difference between the two, which is net assets. The statement of activities accounts for all of the current year's revenues and expenses regardless of when cash is received or paid.

The statement of net assets and statement of activities report the governmental activities for the School District, which encompass all of the School District's services, including instruction and supporting services. Unrestricted State Aid and property taxes finance most of these activities.

The two district-wide statements report the School District's *net assets* and how they have changed. Examining net assets is one way to measure the School District's financial health or *position*. Over time, increases or decreases in the School District's net assets are an indicator of whether its financial position is improving or declining. The relationship between revenues and expenses is the School District's operating results, or in other terms, whether the School District had a profit or a loss at year-end. However, the School District's mission is not simply to generate profits, as may be the case for a commercial entity.

Fund Financial Statements

The fund financial statements provide more detailed information about the School District's funds. Each major fund is presented in a separate column. Non-major funds are aggregated and displayed in a single column. Funds are accounting devices the School District uses to keep track of specific sources of funding and spending on particular programs. Some funds are required by State law and by bond covenants. The School District has two kinds of funds:

Governmental Funds:

All of the School District's basic services are included in governmental funds. Governmental fund reporting generally focuses on how dollars flow in and out of the funds and the balances left at year-end. These balances are reported using the modified accrual basis of accounting. Revenues are recognized when they are measurable and available. Expenditures are recorded when the related fund liability is incurred. The governmental fund statements provide a detailed short-term view of the operations of the School District and the services it provides. Governmental fund information helps the reader determine whether there are more or fewer financial resources that can be spent in the near future to finance the School District's programs. The relationship or differences between governmental activities (reported in the Statement of Net Assets and the Statement of Activities) and governmental funds are presented in a reconciliation displayed further in our documentation. The School District's major governmental funds are the General, 2002 Debt Service and Food Service funds.

Fiduciary Funds:

The School District is the Trustee, or fiduciary, for assets that belong to others. The School District is responsible for ensuring that the assets reported in these funds are used only for their intended purposes, and only by those to whom the assets belong. We exclude these activities from the School District-wide financial statements because the School District cannot use these assets to finance its operations. The Student Activities Accounts are accounted for as fiduciary funds.

The School District as a Whole

Recall that the statement of net assets provides the perspective of the School District as a whole. Table 1 provides a summary of the School District's net assets as of June 30, 2012:

TABLE 1

	Governmental Activities 2010-2011	Governmental Activities 2011-2012
Assets		
Current and other assets	\$1,824,054	\$1,524,882
Capital assets	8,971,534	8,655,795
Total assets	\$10,795,588	\$10,180,677
Liabilities		
Current liabilities	\$1,308,822	\$1,286,898
Long-term liabilities	4,989,834	4,271,799
Total liabilities	6,298,656	5,558,697
Net Assets		
Invested in property and equipment - net of related debt	3,331,313	3,646,329
Restricted	137,863	195,057
Unrestricted	1,027,756	780,594
Total net assets	\$4,496,932	\$4,621,980

The above analysis focuses on the net assets (see Table 1). The School District's net assets were \$4,621,980 at June 30, 2012. Restricted net assets are reported separately to show legal constraints from debt covenants and enabling legislation that limit the School District's ability to use those net assets for day-to-day operations. The School District has \$195,057 restricted net assets. The remaining amount of net assets, \$780,594, was unrestricted.

The \$780,594 in unrestricted net assets of governmental activities represents the accumulated results of all past years' operations. It means that if we had to pay off all of our bills today, including all of our non-capital liabilities, we would have \$780,594 remaining. The operating results of the School District will have a significant impact on the change in unrestricted net assets from year-to-year.

The results of this year's operations for the School District as a whole are reported in the statement of activities (see Table 2), which shows the changes in net assets for fiscal year 2012.

TABLE 2

	Governmental Activities 2010-2011	Governmental Activities 2011-2012	% Change
Revenue			
Program Revenue			
Charges for services	\$166,386	\$178,614	7.3
Operating grants and contributions	692,193	785,636	13.5
General Revenue			
Property taxes	5,211,852	5,307,222	1.8
State School Aid-unrestricted	251,744	117,065	(53.5)
Other	209,912	80,002	(61.9)
Total revenues	6,532,087	6,468,539	(.9)
Functions/Program Expenses			
Instruction	3,338,957	3,514,222	5.2
Support services	1,622,941	1,704,494	5.0
Food services	527,245	553,452	5.0
Interest expense	247,988	254,112	2.5
Other transactions	30,989	1,472	(95.2)
Depreciation (unallocated)	322,659	315,739	(2.1)
Total expenses	6,090,779	6,343,491	4.1
Change in net assets	\$441,308	\$125,048	

As reported in the statement of activities, the cost of all of our governmental activities this year was \$6,343,491. Certain activities were partially funded from those who benefited from the programs, \$178,614, or by other grants and contributions of \$785,636. We paid for the remaining "public benefit" portion of our governmental activities with \$5,307,222 in taxes, \$117,065 in State Aid, and with our other revenues of \$80,002, which includes interest and general entitlements.

The School District experienced an increase in net assets of \$125,048 for the year. The prior year increase in net assets was \$441,308. The key reason for the change in net assets as compared to the prior year was the School District's decrease in revenues and increases in salary and benefits expenses.

As discussed above, the net cost shows the financial burden that was placed on the State and the School District's taxpayers by each of these functions. Since property taxes for operations and unrestricted State Aid constitute the vast majority of School District operating revenue sources, the School Board and Administration must annually evaluate the needs of the School District and balance those needs with State prescribed available unrestricted resources.

The School District's Funds

As noted earlier, the School District uses fund accounting to help it control and manage money for particular purposes. Looking at funds helps the reader consider whether the School District is being accountable for the resources taxpayers and others provide to it and may provide more insight into the School District's overall financial health. The School District's budgets are prepared according to Michigan law. The most significant budgeted fund is the General Fund. The General Fund is the main operating fund of the School District. All other funds would be used to account for the proceeds from specific revenue sources that are legally restricted to certain types of expenditures.

As the School District completed this year, the governmental funds reported a combined fund balance of \$1,008,816, which is a decrease of \$198,464 from the prior year.

Fund Budgetary Highlights

Over the course of the year, the School District revises its budget as it attempts to deal with numerous changes in expected revenues and expenditures. The Uniform Budget Act of the State of Michigan requires that the Board of Education adopt a budget for the upcoming school year prior to July 1, which is the start of the new fiscal year. The School District revised its budget three times during the fiscal year. Under normal circumstances, the School District adjusts its budget to reflect a wide variety of Federal and State programs, many of which are not finalized until well after the School District's original budget is required to be adopted.

A schedule showing the School District's original and final budget amounts compared with amounts actually paid and received is provided in the required supplemental information of these financial statements. Changes to the general fund budget were as follows:

- Final budgeted revenues were increased by \$110,638 over the original budget due to Best Practices Incentive and MPSERs State Revenue.
- Final budgeted expenditures increased by \$61,674 from the original budget due to continued expenditure line adjustments. The School District added programs back into the budget after initial reductions due to student needs as well as increased grant funding.

Capital Asset and Debt Administration

Capital Assets

At June 30, 2012, the School District had \$8,655,795 invested in a range of capital assets including buildings, land, furniture, equipment and vehicles summarized as follows:

	June 30, 2011	June 30, 2012
Building and improvements	\$10,578,925	\$10,578,925
Office equipment	40,392	40,392
Equipment	30,599	30,599
Classroom equipment	262,675	262,675
Buses	394,422	394,422
Vehicles	95,887	95,887
Land	381,996	381,996
Total capital assets	11,784,896	11,784,896
Less: accumulated depreciation	(2,813,362)	(3,129,101)
Total capital assets, net	\$8,971,534	\$8,655,795

Long-term Debt

At June 30, 2012, the long-term debt ending balance was \$5,012,166. This was composed of \$1,405,000 in 2005 School Improvement Bonds; \$455,000 in 2009 School Improvement Bonds; \$3,220,000 in 2012 School Improvement Bonds; \$(70,534) in unamortized financing costs; and \$2,700 in accumulated leave liabilities. A summary of the change in long-term debt is as follows:

Beginning	New	Payments/	Ending
Balance	Debt	Defeasance	Balance
\$5,643,821	\$3,157,367	\$(3,789,022)	\$5,012,166

Economic Factors and Next Year's Budgets and Rates

At the time these financial statements were prepared and audited, the School District was aware of a number of circumstances that could significantly affect the financial health of Frankfort-Elberta Area Schools.

- The retirement rate is 25.36% effective October 1, 2012. Recent enacted legislation caps the retirement rate at 24.46 % for future years; however ongoing litigation has made 25.36% the current rate. State Aid dollars will be used to maintain this rate cap. Containment of costs within the retirement system continues to be a concern for all Michigan school districts.
- This is the fourth year the District is out-of-formula for per pupil funding based on their local property tax collection. We are concerned about the ongoing erosion of our tax base with the potential elimination of the personal property tax. As a result, we will continue our conservative spending practices.
- The exhaustion of Federal Education Jobs funds will mean further reductions in funding for school budgets. The Federal deficit and economic outlook could also hamper the impact for State and Title grant dollars in upcoming fiscal year.

Contacting the School District's Financial Management

This financial report is designed to provide the School District's citizens, taxpayers, customers, and investors and creditors with a general overview of the School District's finances and to demonstrate the School District's accountability for the money it receives. If you have questions about this report or need additional financial information, please contact Thomas Stobie, Superintendent, 534 11th St., Frankfort, MI 49635-9351. We can be reached by telephone at (231) 352-4641.



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REPORT OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS

Board of Education Frankfort-Elberta Area Schools

We have audited the accompanying financial statements of the governmental activities, each major fund and the aggregate remaining fund information of the *Frankfort-Elberta Area Schools* (the "School District") as of and for the year ended June 30, 2012, which collectively comprise the School District's basic financial statements as listed in the table of contents. These financial statements are the responsibility of the School District's management. Our responsibility is to express opinions on these financial statements based on our audit. The prior year comparative information has been derived from the School District's financial statements and, in our report dated November 2, 2011, we expressed an unqualified opinion on the respective financial statements of the governmental activities.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and the significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinions.

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities, each major fund and the aggregate remaining fund information of the Frankfort-Elberta Area Schools as of June 30, 2012, and the respective changes in financial position, thereof for the year then ended in conformity with accounting principles generally accepted in the United States of America.

In accordance with *Government Auditing Standards*, we have also issued our report dated November 2, 2012 on our consideration of the School District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and important for assessing the results of our audit.



Board of Education Frankfort-Elberta Area Schools Page 2

Accounting standards generally accepted in the United States of America require that management's discussion and analysis and budgetary comparison information on pages i through viii, 25 and 26, be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the School District's financial statements as a whole. The combining non-major fund financial statements are presented for purposes of additional analysis and are not a required part of the basic financial statements. The accompanying Schedule of Expenditures of Federal Awards is presented for purposes of additional analysis as required by U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments and Non-Profit Organizations*, and is also not a required part of the financial statements. The combining financial statements and the Schedule of Expenditures of Federal Awards are the responsibility of management, and were derived from and relate directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated in all material respects in relation to the financial statements as a whole.

Dennis, Gartland & Niergarth

November 2, 2012

STATEMENT OF NET ASSETS

June 30, 2012

(With comparative totals for June 30, 2011)

	Governmental Activities			
	2012	2011		
ASSETS				
Current assets				
Cash and cash equivalents	\$ 1,107,809	\$ 226,016		
Investments	228,828	1,329,124		
Due from other governments	157,647	252,669		
Inventory	30,598	16,245		
Total current assets	1,524,882	1,824,054		
Non-current assets				
Capital assets, net of accumulated depreciation	8,655,795	8,971,534		
Total assets	\$ 10,180,677	\$ 10,795,588		
LIABILITIES AND NET ASSETS				
LIABILITIES				
Current liabilities				
Accounts payable and accrued expenses	\$ 72,497	\$ 57,973		
Salaries payable and related expenses	439,757	571,411		
Due to other governments	24,000	-		
Deferred revenue	10,277	25,451		
Current portion of long-term debt	740,367	653,987		
Total current liabilities	1,286,898	1,308,822		
Non-current portion of long-term obligations	4,271,799	4,989,834		
Total liabilities	5,558,697	6,298,656		
NET ASSETS				
Invested in capital assets, net of related debt	3,646,329	3,331,313		
Restricted				
Capital projects	101,679	101,602		
Debt service	93,378	36,261		
Unrestricted	780,594	1,027,756		
Total net assets	4,621,980	4,496,932		
Total liabilities and net assets	\$ 10,180,677	\$ 10,795,588		

The accompanying notes are an integral part of these statements.

STATEMENT OF ACTIVITIES

Year Ended June 30, 2012 (With comparative totals for June 30, 2011)

			Program Revenues Charges Operating Grants				Net (Expense) Changes in Governmen	Net A	ssets	
Functions/Programs		Expenses		or Services and Contributi		Contributions		2012		2011
Governmental activities										
Instruction	\$	3,514,222	\$	7,540	\$	426,515	\$	(3,080,167)	\$	(3,012,542)
Supporting services		1,704,494		37,543		-		(1,666,951)		(1,590,472)
Food service		553,452		133,531		359,121		(60,800)		(27,550)
Other transactions		1,472		-		-		(1,472)		(30,989)
Interest on long-term debt		254,112		-		-		(254,112)		(247,988)
Depreciation - unallocated		315,739		-				(315,739)		(322,659)
Total governmental activities	\$	6,343,491	\$	178,614	\$	785,636		(5,379,241)		(5,232,200)
General purpose	revenues									
Property taxes	1							1 2 (7 2 17		4 41 6 0 40
Levied for g	-	-						4,367,247		4,416,940
Levied for I								939,975		794,912
State school ai				C				117,065		251,744
Investments and cor		s not restricted	to speci	ne programs				11,610		102,202
Investments an	d other							68,392	. <u> </u>	107,710
Total gen	eral purp	ose revenues					. <u> </u>	5,504,289		5,673,508
Change in net ass	ets							125,048		441,308
Net assets - begin	ning of y	/ear						4,496,932		4,055,624
Net assets - end o	f year						\$	4,621,980	\$	4,496,932

 $\frac{c_1}{c_1}$ The accompanying notes are an integral part of these financial statements.

BALANCE SHEET - GOVERNMENTAL FUNDS

June 30, 2012

(With comparative totals for June 30, 2011)

	General		002 Debt Service		Food Service		on-Major vernmental	Total Gov Fur	
	Fund		Fund		Fund		Funds	2012	2011
ASSETS Cash and cash equivalents Investments Due from other governments	\$ 1,062,259 46,795	\$	80,354	\$	105	\$	45,445 101,679	\$ 1,107,809 228,828	\$ 226,016 1,329,124
and other receivables Due from other funds Inventories - supplies and materials	102,626 73,897 -		- -		55,021 25,210 30,598		- - -	157,647 99,107 30,598	252,669 41,577 16,245
Total assets	\$ 1,285,577	\$	80,354	\$	110,934	\$	147,124	\$ 1,623,989	\$ 1,865,631
LIABILITIES AND FUND LIABILITIES Accounts payable Accrued expenses	BALANCES \$ 27,039 439,757	\$	-	\$	14,993	\$	-	\$ 42,032 439,757	\$ 19,911 571,412
Due to other funds Due to other governments Deferred revenue Total liabilities	25,210 - - - - - - - - - - - - - - - - - - -		- - -		71,941 24,000 - 110,934		1,956 - - 1,956	99,107 24,000 10,277 615,173	41,577
	302,285	· . <u> </u>	-		110,934		1,930	013,175	038,551
FUND BALANCES Nonspendable Restricted	-		-		30,598		-	30,598	16,245
Capital projects Debt service Committed for subsequent year expenditures			- 80,354		-		101,679 43,489 -	101,679 123,843	101,602 74,322 337,509
Unassigned	783,294	. <u> </u>			(30,598)		-	752,696	677,602
Total fund balances	783,294		80,354				145,168	1,008,816	1,207,280
Total liabilities and fund balances	\$ 1,285,577	\$	80,354	\$	110,934	\$	147,124		
Reconciliation of Governmental Fu	ind Balances to	Distr	ict-Wide G	over	nment Acti	vities	Net Assets		
Amounts reported for governmental	activities in the	statem	ent of net as	ssets a	re different	t beca	use:		
Capital assets used in governmentar reported as assets in governmentar accumulated depreciation is \$3,	tal funds. The						e not	8,655,795	8,971,534
Long-term liabilities, including bonds payable, are not due and payable in the current period and, therefore, are not reported as liabilities in the funds. Long-term liabilities at year-end consist of:									
					Inamortized Accrued in Accumulate	l finaı nteres	t on bonds	(5,080,000) 70,534 (30,465) (2,700)	(5,700,000) 59,779 (38,061) (3,600)

Total net assets - governmental activities

The accompanying notes are an integral part of these financial statements.

\$ 4,621,980 \$ 4,496,932

STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES - GOVERNMENTAL FUNDS

Year Ended June 30, 2012

(With comparative totals for June 30, 2011)

	General	2002 Debt	Food	Non-Major Governmental		vernmental nds
	Fund	Service Fund	Service Fund	Funds	2012	2011
Revenues						
Property taxes	\$ 4,367,247	\$ 740,384	\$ -	\$ 199,591	\$ 5,307,222	\$ 5,211,852
Interest	10,477	844	-	299	11,620	11,007
State revenues	342,766	-	19,879	-	362,645	394,907
Federal revenues	168,999	-	342,661	-	511,660	594,172
Other	142,763		130,111	2,518	275,392	320,149
Total revenues	5,032,252	741,228	492,651	202,408	6,468,539	6,532,087
Expenditures						
Instruction	3,509,646	-	-	-	3,509,646	3,353,704
Supporting services	1,704,007	-	-	-	1,704,007	1,635,843
Other transactions	797	675	-	-	1,472	32,382
Food service	-	-	553,452	-	553,452	529,795
Debt service						
Principal	-	555,000	-	110,000	665,000	635,000
Interest	-	89,009	-	72,268	161,277	251,913
Capital outlay	5,063				5,063	16,671
Total expenditures	5,219,513	644,684	553,452	182,268	6,599,917	6,455,308
REVENUES OVER (UNDER)						
EXPENDITURES	(187,261)	96,544	(60,801)	20,140	(131,378)	76,779
Other financing sources (uses)						
Operating transfers in	-	-	60,801	-	60,801	30,100
Operating transfers out	(60,801)	-	-	-	(60,801)	(30,100)
Proceeds from bond issue	-	3,220,000	-	-	3,220,000	-
Payments to escrow agent	-	(3,241,781)	-	-	(3,241,781)	-
Bond issuance costs		(45,305)			(45,305)	
Total other financing sources (uses)	(60,801)	(67,086)	60,801		(67,086)	
REVENUES OVER (UNDER) EXPENDITURES AND OTHER FINANCING SOURCES (USES)	(248,062)	29,458	-	20,140	(198,464)	76,779
Fund balance, beginning of year	1,031,356	50,896		125,028	1,207,280	1,130,501
Fund balance, end of year	\$ 783,294	\$ 80,354	\$ -	\$ 145,168	\$ 1,008,816	\$ 1,207,280

The accompanying notes are an integral part of these financial statements.

RECONCILIATION OF THE GOVERNMENTAL FUNDS STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES WITH THE DISTRICT-WIDE STATEMENT OF ACTIVITIES

Year Ended June 30, 2012

(With comparative totals for June 30, 2011)

	2012	2011
Total net change in fund balances - governmental funds	\$ (198,464)	\$ 76,779
Amounts reported for governmental activities in the statement of activities are different because:		
Capital outlays to purchase or build capital assets are reported in the governmental funds as expenditures. However, for governmental activities, those costs are allocated over their estimated useful lives as annual depreciation expenses in the statement of activities. This is the amount by which capital outlays exceed depreciation in the period.		
Depreciation expense	(315,739)	(313,243)
In the statement of activities, certain operating expenses - compensated absences - are measured by the amounts earned during the year. In the governmental funds; however, expenditures for these items are measured by the amount of financial resources used (essentially, the amounts actually paid). This year \$3,600 compensated absences were paid out and \$2,700 were earned.	900	(1,800)
In the statement of activities, certain operating expenses - early retirement incentives - are measured by the amounts earned during the year. In the governmental funds; however, expenditures for these items are measured by the amount of financial resources used (essentially, the amounts actually paid). This year, early retirement incentive benefits paid out were \$4,500.	-	56,900
Repayment of bond principal (including refunding) is an expenditure in the governmental funds, but it reduces long-term liabilities in the statement of net assets and does not affect the statement of activities.	3,840,000	635,000
The amount financed by the bond proceeds, net of issue costs, is reported in the governmental funds as a source of financing. On the other hand, the bond proceeds are not revenues in the statement of activities but rather constitute long-term liabilities in the statement of net assets.	(3,174,695)	-
The difference between the reacquisition price and the net carrying amount of defeased debt.	24,528	-
Amortization of deferred financing costs.	(59,078)	(16,253)
Interest on long-term debt in the statement of activities differs from the amount reported in the governmental funds because interest is recorded as an expenditure in the funds when it is due, and thus requires the use of current financial resources. In the statement of activities; however, interest expense is recognized as the interest accrues, regardless of when it is due. The reduced amount of interest reported in the statement of activities is		
the net result of the decrease in accrued interest on bonds payable.	7,596	3,925
Change in net assets of governmental activities	\$ 125,048	\$ 441,308

STATEMENT OF FIDUCIARY NET ASSETS

June 30, 2012

(With comparative totals for June 30, 2011)

	Agency	Funds
	2012	2011
ASSETS Cash and cash equivalents	\$ 57,611	\$ 49,785
LIABILITIES Due to student groups	\$ 57,611	\$ 49,785

NOTES TO FINANCIAL STATEMENTS

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Introduction

Frankfort-Elberta Area Schools (the "School District") is a Michigan public school district consisting of one elementary school and a junior and senior high school. The School District primarily serves the Benzie County area. As of June 30, 2012, the School District employed 39 professional staff and 25 non-professional staff, and has approximately 525 students enrolled within its School District.

The accounting policies of the School District conform to generally accepted accounting principles as applicable to governments. The School District is considered to be a local government unit.

The accounting and reporting framework and the more significant accounting principles and practices of Frankfort-Elberta Area Schools are discussed in subsequent sections of this note. The remainder of the notes is organized to provide explanations, including required disclosures, of the School District's financial activities for the fiscal year ended June 30, 2012.

The Financial Reporting Entity

Frankfort-Elberta Area School's Board of Education (the "Board") is the basic level of government which has oversight responsibility and control over all activities related to the public school education. The Board receives funding from local, State and Federal governmental sources and must comply with the concomitant requirements of these funding source entities. However, the Board is not included in any other governmental "reporting entity" as defined in Governmental Accounting Standards Board ("GASB") Statement No. 14, since Board members are elected by the public and have decision-making authority to levy taxes, the power to designate management, the ability to significantly influence operations and primary accountability for fiscal matters. In addition, under the criteria of the GASB pronouncements, student, parent and teacher organizations are not included, except to the extent that the schools hold assets in the capacity of an agent.

Government-Wide and Fund Financial Statements

Government-Wide Financial Statements

The statement of net assets and statement of activities display information about the School District as a whole, except for its fiduciary activities. Individual funds are not displayed.

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - Continued

The statement of activities reports the expenses of a given function offset by program revenues directly connected with the functional program. A function is an assembly of similar activities and may include portions of a fund or summarize more than one fund to capture the expenses and program revenues associated with a distinct functional activity. Program revenues include: (1) charges for services which report fees, fines and forfeitures, and other charges to users of the School District's services; (2) operating grants and contributions which finance annual operating activities including restricted investment income; and (3) capital grants and contributions which fund the acquisition, construction or rehabilitation of capital assets. These revenues are subject to externally imposed restrictions to these program uses. Taxes and other revenue sources not properly included with program revenues are reported as general revenues.

Fund Financial Statements

The balance sheet and statement of revenues, expenditures and changes in fund balances (i.e., fund financial statements) for the School District's governmental funds are presented after the government-wide statements. These statements display information about major funds individually and non-major funds in the aggregate for governmental funds. Major funds are generally those that represent 10% or more of governmental fund assets, liabilities, revenues or expenditures.

Measurement Focus, Basis of Accounting and Financial Statement Presentation

The financial statements of the School District are prepared in accordance with generally accepted accounting principles ("GAAP"). The School District's reporting entity applies all relevant Governmental Accounting Standards Board ("GASB") pronouncements and applicable Financial Accounting Standards Board ("FASB") pronouncements and Accounting Principles Board ("APB") opinions issued on or before November 30, 1989, unless they conflict with GASB pronouncements. The School District's reporting entity does not apply FASB pronouncements or APB opinions issued after November 30, 1989.

The government-wide statements report using the economic resources measurement focus and the accrual basis of accounting generally including the reclassification or elimination of internal activity (between or within funds). Reimbursements are reported as reductions to expenses. Fiduciary fund financial statements also report using this same focus and basis of accounting, although internal activity is not eliminated in these statements. Revenues are recorded when earned and expenses are recorded when a liability is incurred, regardless of the timing of related cash flows. Property taxes are recognized in the year for which they are levied while grants are recognized when grantor eligibility requirements are met.

Governmental fund financial statements report using the current financial resources measurement focus and the modified accrual basis of accounting. Revenues are recognized when they are both measurable and available. Available means collectible within the current period or soon enough thereafter to pay current liabilities. The School District considers revenues to be available if they are collected within 60 days of the end of the fiscal year. Expenditures are recorded when the related fund liability is incurred, except for general obligation bond principal and interest which are reported as expenditures in the year due.

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - Continued

Major revenue sources susceptible to accrual include property taxes, intergovernmental revenues and investment income. In general, other revenues are recognized when cash is received.

Fund Types and Major Funds

Activities in Major Funds

The *General Fund* is the general operating fund of the School District. It is used to account for all financial resources except those required to be accounted for in another fund.

The 2002 Debt Service Fund is used to account for the accumulation of resources for and the payment of, bond principal, interest and related costs.

The *Food Service Fund* is a special revenue fund that is used to account for the proceeds of specific revenue sources that are legally restricted to expenditures for special purposes.

Other Governmental Funds

The *Capital Projects Fund* is used to account for financial resources to be used for the acquisition or construction of major capital facilities.

The 2005, 2009 and 2012 Debt Service Funds are used to account for the accumulation of resources for, and the payment of, bond principal, interest and related costs.

Fiduciary Fund Types

Agency Fund

The Agency Fund accounts for assets held by the School District as an agent for individuals, private organizations, other governments or other funds. Agency Funds are custodial in nature (assets equal liabilities) and do not involve measurements of results of operations. The Student Activity Fund is an Agency Fund.

Cash and Investments

The School District reporting entity considers highly liquid investments (including restricted assets) with an original maturity of three months or less when purchased to be cash equivalents.

Investments are reported at fair value which is determined using selected bases. Short-term investments are reported at cost, which approximates fair value. Cash deposits are reported at carrying amount, which reasonably estimates fair value.

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - Continued

Inventories

Inventories in governmental funds consist of expendable supplies held for consumption stated on a firstin, first-out basis and homes constructed for resale. They are reported at cost, which is recorded as an expenditure at the time individual inventory items are used or sold.

Capital Assets

Capital assets are recorded at cost or, if donated, the fair value at the time of donation. Capital assets are depreciated over their estimated useful lives ranging from 3 to 50 years. The School District generally capitalizes assets with cost of \$5,000 or more as purchase and construction outlays occur. No depreciation is recorded on land. Expenditures for major renewals and betterments that extend the useful lives of the capital assets are capitalized. Expenditures for maintenance and repairs are charged to current expenditures as incurred. Depreciation is computed using the straight-line method. When capital assets are disposed, the cost and applicable accumulated depreciation are removed from the respective accounts and the resulting gain or loss is recorded in operations.

Estimated useful lives, in years, for depreciable assets are as follows:

Buildings	25-50
Improvements, other than buildings	15-20
Vehicles	7-10
Furniture, machinery and equipment	3-20

Long-Term Debt, Deferred Debt Expense and Bond Discounts/Premiums

In the government-wide financial statements, outstanding debt is reported as a liability. Bond issuance costs, bond discounts or premiums, and the difference between the reacquisition price and the net carrying value of refunded debt are capitalized and amortized over the terms of the respective bonds using a method that approximates the effective interest method.

The governmental fund financial statements recognize the proceeds of debt and premiums as other financing sources of the current period. Issuance costs are reported as expenditures.

Encumbrance Accounting

The School District formally records encumbrances in the accounting records during the year as a normal practice. In accordance with generally accepted accounting principles, outstanding encumbrances at year-end for which goods or services are received are reclassified as expenditures and accounts payable. All other encumbrances in the annual budgeted funds are reversed at year-end and are either canceled or are included as reappropriations of fund balance for the subsequent year.

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - Continued

Fund Equity

Governmental fund equity is classified as fund balance. Fund balance is further classified as nonspendable, restricted, committed, assigned or unassigned. Nonspendable fund balance cannot be spent because of its form. Restricted fund balance has limitations imposed by creditors, grantors or contributors, or by enabling legislation or constitutional provisions. Committed fund balance is a limitation imposed by the School Board through approval of resolutions. Assigned fund balance in the General Fund is the net resources in excess of what can be properly classified in one of the above four categories. Negative unassigned fund balance in other governmental funds represents excess expenditures incurred over the amounts restricted, committed or assigned to those purposes.

When both restricted and unrestricted fund balances are available for use, it is the School District's policy to use restricted fund balance first, then unrestricted fund balance. Furthermore, committed fund balances are reduced first, followed by assigned amounts and then unassigned amounts when expenditures are incurred for purposes for which amounts in any of those unrestricted fund balance classifications can be used.

Use of Estimates in the Preparation of Financial Statements

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual amounts could differ from those estimates.

Allocation of Expenses

The School District reports each function's direct expenses, those that are specifically associated with a service, program or department and, thus, are clearly identifiable to a particular function.

The School District has elected to not allocate indirect expenses.

Program Revenues

Program revenues derive directly from the program itself or from outside parties for the restricted use in a particular program. On the statement of activities, program revenues reduce the net cost of the various functions to reflect the amount which is financed from the School District's general revenues.

The School District's most significant program revenues are Title I, At-Risk and School Lunch Programs, which are reported as operating grants and contributions.

Reclassification

Certain prior year amounts have been reclassified to conform with the current presentation.

NOTE B - BUDGETARY POLICY AND PRACTICE

The School District has adopted these procedures in establishing the budgets as reflected in the financial statements.

- 1. As early as possible in the preceding fiscal year (generally in the spring), the Superintendent formulates preliminary budgets for the coming year, which he submits to the Board of Education for their review.
- 2. A public hearing is held prior to June 30 on the proposed budgets to obtain taxpayer comments.
- 3. The Board of Education reviews the proposed budget and then in June adopts a formal resolution approving the needed appropriations for the coming operating year.
- 4. All transfers of budget amounts and any amendments to the formal Appropriation Act are approved by the Board of Education.
- 5. It is the Superintendent's responsibility to supervise and monitor the budget hearing. He does this by reviewing the monthly financial data and reporting and recommending any needed amendments to the Board of Education.
- 6. The budget is adopted on a basis consistent with generally accepted accounting principles.
- 7. The budget presented in these financial statements is as originally adopted and as formally amended by the Board of Education.
- 8. All annual appropriations lapse at fiscal year-end.

Excess of Expenditures over Appropriations in Budgeted Funds

Michigan Public Act 621 of 1978 provides that a local unit shall not incur expenditures in excess of the amounts appropriated. During the year ended June 30, 2012, the School District was out of compliance with the Act as follows:

	E	Budget	 Actual	Variance		
General Fund Transfers out	\$	36,658	\$ 60,801	\$	24,143	
Food Service Fund Food service		546,801	553,452		6,651	

NOTE C - CASH AND INVESTMENTS

At June 30, 2012, the School District's cash and investments included the following:

	Balance Sheet Classification								
	Eq	uivalents	Inv	vestments		Total			
Bank deposits and cash on hand Money markets accounts Investment pool	\$	528,994 636,426 -	\$	228,828	\$	528,994 636,426 228,828			
	<u>\$</u>	<u>1,165,420</u>	\$	228,828	<u>\$1</u>	,394,248			

Custodial Credit Risk - Deposits

In the event of a bank failure, the School District's deposits may not be returned to it. As of June 30, 2012, \$832,164 of the School District's cash and investments was insured. The remaining bank balance of \$626,139 was exposed to custodial credit risk because it was uninsured and uncollateralized.

Investments

Michigan law permits investments in the following vehicles:

- 1. Bonds and other obligations of the United States Government.
- 2. Certificates of deposit and savings accounts of banks or credit unions who are members of the FDIC and FSLIC, respectively.
- 3. Certain commercial paper.
- 4. United States Government repurchase agreements.
- 5. Banker's acceptance of United States banks.
- 6. Certain mutual funds.

	Current Maturities (in years)										
	Fair Value	Current	<u>1-5</u>	<u>6-10</u>	More than 10						
Investment pool	<u>\$228,828</u>	<u>\$228,828</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ </u>						

Interest Rate Risk

In accordance with the School District's investment policy, the School District will minimize interest rate risk, which is the risk that the market value of securities in the portfolio will fall due to changes in market interest rates, by: structuring the investment portfolio so that securities mature to meet cash requirements for ongoing operations, thereby avoiding the need to sell securities in the open market; and, investing operating funds primarily in short-term securities, liquid asset funds, money market funds or similar investment pools, and limiting the average maturity in accordance with the School District's cash requirements.

NOTE C - CASH AND INVESTMENTS - Continued

Credit Risk

State law limits investments in commercial paper and corporate bonds to a prime or better rating issued by nationally recognized rating organizations. The School District has no investment policy that would further limit its investment choices. The School District's investments in the MILAF investment pool were rated AAAm by Standard & Poor's.

NOTE D - RECEIVABLES, UNCOLLECTIBLE ACCOUNTS AND DEFERRED REVENUE

Property Taxes Receivable, Deferred Revenue and Property Tax Calendar

Property taxes are levied, billed and attached as enforceable liens on July 1 of the School District's fiscal year. Townships within the School District collect and remit taxes until September 15, at which time the uncollected real property taxes are turned over to the counties as delinquent. Delinquent real property taxes are funded by the county and remitted to the School District. Delinquent personal property tax remains a receivable until collected from the taxpayer by the townships and remitted to the School District. In the governmental fund financial statements, if delinquent taxes are not paid within 60 days of year-end, they are recorded as deferred revenue. In the government-wide financial statements, property taxes receivable and related revenue include all amounts due the School District regardless of when cash is received. Over time, substantially all property taxes are collected.

During the fiscal year, \$18 per \$1,000 of equalized non-principal residence property value in the School District of \$243.9 million was levied and \$6 per \$1,000 of commercial personal property values in the School District of \$13.2 million was levied for general operating purposes. For Debt Service purposes, \$2.35 per \$1,000 of equalized principal, non-principal residence and commercial personal property values in the School District of \$389.5 million was levied.

Intergovernmental Receivables and Deferred Revenue

Intergovernmental receivables are primarily comprised of amounts due from the State and Federal governments. Revenue is recorded as earned when eligibility requirements are met. Grant revenues deferred in the governmental fund financial statements include unearned revenue and revenue received more than 60 days following year-end (unavailable to pay liabilities of the current period). Deferred revenue received after 60 days is fully recognized as revenue in the government-wide statements if grantor eligibility requirements are met.

NOTE D - RECEIVABLES, UNCOLLECTIBLE ACCOUNTS AND DEFERRED REVENUE - Continued

Amounts due from other governments at June 30, were as follows:

	 2012	2011	
Due from State of Michigan - State Aid	\$ 55,511	\$	73,574
Due from Federal grants	81,368		103,132
Due from townships - Property taxes	430		23,283
Other receivables	 21,548		52,680
	\$ 158,857	\$	252,669

NOTE E - INVESTMENTS IN CAPITAL ASSETS

Investments in capital assets consisted of the following:

	Balance at			Balance at
	June 30, 2011	Additions	Deletions	June 30, 2012
Buildings and improvements	\$10,578,925	\$-	\$-	\$10,578,925
Office equipment	40,392	-	-	40,392
Equipment	30,599	-	-	30,599
Classroom equipment	262,675	-	-	262,675
Buses	394,422	-	-	394,422
Vehicles	95,887			95,887
Total	11,402,900	-	-	11,402,900
Less accumulated depreciation	(2,813,362)	(315,739)	-	(3,129,101)
Land	381,996			381,996
Total capital assets, net	\$ 8,971,534	\$ (315,739)	\$ -	\$ 8,655,795

Depreciation expense of \$315,739 was unallocated.

NOTE F - LONG-TERM LIABILITIES

	eginning Balance	<u> </u>	Jew Debt	Payments		In-Substance Defeasance		 Ending Balance		Current Portion
General obligation bonds Amortized	\$ 5,700,000	\$	3,220,000	\$	(665,000)	\$	(3,175,000)	\$ 5,080,000	\$	760,000
financing costs	(59,779)		(69,833)		59,078		-	(70,534)		(22,333)
Early retirement incentive Compensated	-		4,500		(4,500)		-	-		-
absences	 3,600		2,700		(3,600)		-	 2,700		2,700
	\$ 5,643,821	\$	3,157,367	\$	(614,022)	\$	(3,175,000)	\$ 5,012,166	\$	740,367

Changes in long-term debt during the year ended June 30, 2012 were as follows:

Payments on general obligation bonds are made by the Debt Service Fund. The accumulated leave liability will be liquidated primarily from the General Fund.

At June 30, 2012, the School District's long-term debt consisted of the following:

2005 School Improvement Bonds. Remaining installments due annually of \$70,000 to \$160,000 through May 1, 2024; average remaining interest rate of 4.45%.	\$1,405,000
2009 School Improvement Bonds. Remaining installments due annually of \$40,000 to \$165,000 through May 1, 2015; average remaining interest rate of 2.35%.	455,000
2012 School Improvement Bonds. Remaining installments due annually of \$635,000 to \$680,000 through May 1, 2017; average remaining interest rate of 1.70%.	3,220,000
Total general obligation bonds	5,080,000
Unamortized financing costs	(70,534)
Accumulated leave liability	2,700
Total long-term debt	\$5,012,166

NOTE F - LONG-TERM LIABILITIES - Continued

Years Ending June 30,	Principal	Interest
· · · ·	i	
2013	\$ 760,000	\$ 134,337
2014	810,000	111,549
2015	850,000	96,689
2016	870,000	79,197
2017	765,000	59,976
2018-2022	705,000	160,102
2023-2024	320,000	20,560
	\$ 5,080,000	\$ 662,410

Total annual requirements to amortize bonds as of June 30, 2012 were as follows:

Interest expense for the year ended June 30, 2012 was \$254,112 and interest paid for the year ended June 30, 2012 was \$161,277.

In-Substance Defeasance

On February 22, 2012, the School District issued \$3,220,000 in general obligation refunding bonds with interest rates ranging from 1.35% to 2.00% to extinguish \$3,175,000 of outstanding 2002 general obligation bonds with an average remaining interest rate of 4.18%. The refunding was undertaken to lower interest costs and reduce the School District's annual debt service requirements.

Bonds totaling \$555,000 were not part of the refunding and were funded by the School District on the scheduled payment date of May 1, 2012.

The net proceeds of \$3,174,695 (after payment of expenses of \$45,305 for underwriter's discount, issuance costs and miscellaneous fees) plus \$67,086 from Debt Service Funds were deposited with an escrow agent to provide for the redemption of the \$3,175,000 outstanding 2002 general obligation bonds and payment of \$89,009 of interest on the outstanding bonds. The 2002 general obligation bonds were redeemed by the escrow agent on the optional redemption date of May 1, 2012.

The bond refunding decreases the School District's total debt service payments by \$188,734 over six years and yields and economic gain (the difference between the present value of the debt service payments on the old and new debt) of \$178,489.

NOTE G - RISK MANAGEMENT

The School District is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; unemployment benefits; and natural disasters. The School District manages its risk exposures and provides certain employee benefits through a combination of self-insurance and risk management pools.

The School District pays unemployment claims on a reimbursement basis.

The School District participates in SET-SEG's risk management pools for worker's compensation claims, liability insurance and errors and omissions coverages. SET-SEG was established pursuant to laws of the State of Michigan which authorize local units of government to jointly exercise any power, privilege or authority which each might exercise separately. The purpose of SET-SEG is to provide cooperative and comprehensive risk financing and risk control services. SET-SEG provides risk management, underwriting, reinsurance and claim review and processing services for all member governments pursuant to its charter.

The School District makes annual contributions to SET-SEG based on actuarial studies using historical data and insurance industry statistics. These contributions are paid from the General Fund. Such contributions as received by SET-SEG's General Fund are expended for reinsurance coverage, claim payments and certain general and administrative costs, whereas resources in the Member Retention Fund are used for loss payments and defense costs up to the member's self-insurance retention limits along with certain other member-specific costs. Any refunds from SET-SEG are deposited in the School District's General Fund.

NOTE H - BALANCES AND TRANSFERS/PAYMENTS WITHIN THE REPORTING ENTITY

Receivables and Payables

Outstanding balances between funds reported as "due to/from other funds" include outstanding charges by one fund to another for services or goods, subsidy commitments outstanding at year-end and other miscellaneous receivables/payables between funds.

Interfund receivables and payables as reported in the governmental fund financial statements at June 30, 2012 were as follows:

	Iı	nterfund	I	nterfund
Fund	Receivable Payabl			
Major Funds				
General Fund	\$	73,897	\$	25,210
Food Service Fund		25,210		71,941
Other Governmental Funds				
2009 Debt Service Fund		-		1,956
	\$	99,107	\$	99,107

NOTE H - BALANCES AND TRANSFERS/PAYMENTS WITHIN THE REPORTING ENTITY - Continued

Transfers and Payments

Transfers and payments within the reporting entity are substantially for the purposes of subsidizing operating functions, funding capital projects and asset acquisitions or maintaining debt service on a routine basis. Resources are accumulated in a fund to support and simplify the administration of various projects or programs.

The government-wide statement of activities eliminates transfers as reported within the segregated governmental and business-type activities columns. Only transfers between the two columns appear in this statement.

The following schedule reports transfers and payments within the reporting entity:

Fund	Tra	unsfers In	Tra	sfers Out	
Major Funds General Fund Food Service Fund	\$	- 60,801	\$	60,801	
	\$	60,801	\$	60,801	

NOTE I - PENSION PLAN

The School District contributes to the Michigan Public School Employees' Retirement Systems ("MPSERS"), a cost-sharing multiple-employer defined benefit pension plan administered by the State of Michigan, Department of Management & Budget, Office of Retirement Services ("ORS"). MPSERS provides retirement, disability, death and post-employment health benefits to plan members and beneficiaries. Member Investment Plan ("MIP") participants receive enhanced benefits compared to Basic Plan participants. Benefits are safeguarded by Article IX, Section 24 of the Michigan Constitution. Public Act 300 of 1980, as amended, assigns authority to establish and amend benefit provisions to the State Legislature. MPSERS issues a publicly available financial report that includes financial statements and required supplementary information. That report may be obtained by writing to MPSERS, P.O. Box 30171, Lansing, MI 48909-7671, by calling (517) 322-5103 or on the State of Michigan's website at <u>www.Michigan.gov</u>.

NOTE I - PENSION PLAN - Continued

Funding Policy

Plan members who participate in MIP are required to contribute 3% to 4.3% of their annual covered salary; plan members who participate in the Basic Plan may not contribute to the Plan; and the School District is required to contribute at an actuarially determined rate using the entry age actuarial cost method. Members are also required to contribute 3% for retirement health care benefits. The rate was 20.66% and 19.16%, dependent on entrance date, for the period July 1, 2011 to September 30, 2011, and 24.46% and 23.23%, dependent on entrance date, for the period October 1, 2011 to June 30, 2012, of annual covered payroll. The contribution requirements of plan members and the School District are established and may be amended by the State Legislature. The School District's contributions to MPSERS for the years ended June 30, 2012, 2011 and 2010, were \$633,703, \$516,930 and \$465,972, respectively, which is equal to the required contribution for the year.

Post-Employment Benefits

Under the MPSERS Act, all retirees participating in the MPSERS pension plan have the option of continuing health, dental and vision coverages. Retirees having these coverages contribute an amount equivalent to the monthly cost for Part B Medicare and 10% of the monthly premium amount for the health, dental and vision coverages. Required contributions for post-employment health care are included as part of the School District's total contribution to the MPSERS plan discussed above.

NOTE J - COMMITMENTS AND CONTINGENCIES

Federal and State Grants

In the normal course of operations, the School District receives grant funds from various Federal and State agencies. The grant programs are subject to audit by agents of the granting authorities, the purpose of which is to ensure compliance with conditions precedent to the granting of funds. Any liability for reimbursement which may arise as the result of these audits is not believed to be material.

REQUIRED SUPPLEMENTARY INFORMATION

BUDGETARY COMPARISON SCHEDULE FOR THE GENERAL FUND

For the Year Ended June 30, 2012

(With comparative totals for June 30, 2011)

			Actual	Variances - Pos	sitive (Negative)	Actual	
	Budgeted	Amounts	(GAAP Basis)	Original to	Final to Actual	(GAAP Basis)	
	Original	Final	2012	Final	Total	2011	
Revenues							
Local and intermediate sources	\$ 4,523,838	\$ 4,429,180	\$ 4,377,724	\$ (94,658)	\$ (51,456)	\$ 4,500,099	
State revenues	214,771	344,280	342,766	129,509	(1,514)	374,690	
Federal revenues	140,640	179,222	168,999	38,582	(10,223)	287,371	
Incoming transfers and other transactions	33,605	70,810	142,763	37,205	71,953	74,187	
Total revenues	4,912,854	5,023,492	5,032,252	110,638	8,760	5,236,347	
Expenditures							
Instruction	3,515,933	3,539,178	3,514,222	(23,245)	24,956	3,362,721	
Supporting services	1,695,924	1,734,353	1,704,494	(38,429)	29,859	1,659,478	
Payments to other governmental agencies	2,500	2,500	797		1,703	600	
Total expenditures	5,214,357	5,276,031	5,219,513	(61,674)	56,518	5,022,799	
REVENUES OVER (UNDER) EXPENDITURES	(301,503)	(252,539)	(187,261)	48,964	65,278	213,548	
Other financing uses							
Operating transfers out	(36,006)	(36,658)	(60,801)	(652)	(24,143)	(30,100)	
REVENUES OVER (UNDER) EXPENDITURES							
AND OTHER FINANCING USES	(337,509)	(289,197)	(248,062)	48,312	41,135	183,448	
Fund balance, beginning of year	1,031,356	1,031,356	1,031,356			847,908	
Fund balance, end of year	\$ 693,847	\$ 742,159	\$ 783,294	\$ 48,312	\$ 41,135	\$ 1,031,356	

BUDGETARY COMPARISON SCHEDULE FOR THE FOOD SERVICE FUND

For the Year Ended June 30, 2012

(With comparative totals for June 30, 2011)

					Actual	Variances - Positive (Negative)				Actual		
		Budgeted	Amo	unts	(GA	AP Basis)	O	riginal to	Fina	l to Actual	(GA	AP Basis)
		Original	ginal Final		2012		Final		Total		2011	
Revenues												
Local sources	\$	122,700	\$	142,151	\$	116,891	\$	19,451	\$	(25,260)	\$	162,677
State revenues		15,596		19,547		19,879		3,951		332		20,217
Federal revenues		330,967		335,224		342,661		4,257		7,437		306,801
Incoming transfers and other transactions		10,000		13,221		13,220		3,221		(1)		10,000
Total revenues		479,263		510,143		492,651		30,880		(17,492)		499,695
Expenditures												
Food service		515,269		546,801		553,452		(31,532)		(6,651)		529,795
REVENUES UNDER EXPENDITURES		(36,006)		(36,658)		(60,801)		(652)		(24,143)		(30,100)
Other financing sources												
Operating transfers in		36,006		36,658		60,801		652		24,143		30,100
REVENUES UNDER EXPENDITURES AND OTHER FINANCING SOURCES		-		-		-		-		-		-
Fund balance, beginning of year						-		-				
Fund balance, end of year	\$	-	\$	-	\$	-	\$		\$	-	\$	-

COMBINING FINANCIAL STATEMENTS OF NON-MAJOR GOVERNMENTAL FUNDS

COMBINING BALANCE SHEET - NON-MAJOR GOVERNMENTAL FUNDS

June 30, 2012

(With comparative totals for June 30, 2011)

	Capital Projects Fund Public			Debt Service Funds						Total Non-Major Governmental Funds			
	Improvement		2005		2009		2012		2012		2011		
ASSETS													
Cash and cash equivalents	\$	-	\$	23,336	\$	19,591	\$	2,518	\$	45,445	\$	3,185	
Investments		101,679		-		-		-		101,679		125,028	
Due from other governments and													
other receivables		-		-		-		-		-		4,448	
Total assets	\$	101,679	\$	23,336	\$	19,591	\$	2,518	\$	147,124	\$	132,661	
LIABILITIES AND FUND BALA	NCE	S											
LIABILITIES													
Due to other funds	\$	-	\$	-	\$	1,956	\$	-	\$	1,956	\$	3,185	
Deferred revenue		-		-		-		_		-		4,448	
Total liabilities		-		-		1,956		-		1,956		7,633	
FUND BALANCES													
Restricted													
Capital projects		101,679		-		-		-		101,679		101,602	
Debt Service		-		23,336		17,635		2,518		43,489		23,426	
Total fund balances		101,679		23,336		17,635		2,518		145,168		125,028	
Total liabilities and fund balances	\$	101,679	\$	23,336	\$	19,591	\$	2,518	\$	147,124	\$	132,661	

COMBINING STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES - NON-MAJOR GOVERNMENTAL FUNDS

Year Ended June 30, 2012

(With comparative totals for June 30, 2011)

	-	al Projects									
		Fund	 Debt Service Funds					Total Non-Major			
	I	Public							Governme	ental F	unds
	Imp	rovement	 2005	2009		2012		2012			2011
Revenues											
Property taxes	\$	-	\$ 139,716	\$	59,875	\$	-	\$	199,591	\$	157,433
Interest		77	150		72		-		299		336
Other			 				2,518		2,518		
Total revenues		77	 139,866		59,947		2,518		202,408		157,769
Expenditures											
Debt service											
Principal		-	70,000		40,000		-		110,000		100,000
Interest		-	59,975		12,293		-		72,268		75,220
Capital outlay		-	 -		-		-		-		14,408
Total expenditures			 129,975		52,293		-		182,268		189,628
REVENUES (UNDER) OVER											
EXPENDITURES		77	9,891		7,654		2,518		20,140		(31,859)
Fund balance, beginning of year		101,602	 13,445		9,981				125,028		156,887
Fund balance, end of year	\$	101,679	\$ 23,336	\$	17,635	\$	2,518	\$	145,168	\$	125,028

FEDERAL PROGRAMS

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

Year Ended June 30, 2012

Federal Grantor/ Pass-Through Grantor Program Title	CFDA Number	Original Approved Award/Grant Amount	Accrued Revenue June 30, 2011	Prior Year Expenditures	Current Year Receipts	Current Year Expenditures	Accrued Revenue June 30, 2012
United States Department of Agriculture Passed through Michigan Department of Education Child Nutrition Cluster School Breakfast Program 1970 Breakfast	10.553	\$ 39,771	\$ -	\$ -	\$ 39,771	\$ 39,771	\$ -
National School Lunch Program 1950 All Lunches 1960 Free and Reduced	10.555	18,185 123,913	-	-	18,185 123,913	18,185 123,913	-
Total National School Lunch Program		142,098			142,098	142,098	
USDA Commodities Bonus Entitlement	10.555	15,993 230	-	-	15,993 	15,993 230	
Total USDA Commodities		16,223			16,223	16,223	
Summer Food Service Program for Children 1900 Summer	10.559	178,143	33,574	33,574	140,854	144,569	37,289
Total Child Nutrition Cluster passed through United Department of Agriculture	States	376,235	33,574	33,574	338,946	342,661	37,289
United States Department of Education Passed through Michigan Department of Education Title I, Part A Cluster Title I, Part A - Grants to Local Educational Agencies 111530-1011 121530-1112	84.010	84,311 114,503	20,210	84,311	20,210 76,119	101,382	25,263
Total Title I, Part A Cluster		198,814	20,210	84,311	96,329	101,382	25,263

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

Year Ended June 30, 2012

Federal Grantor/ Pass-Through Grantor Program Title	CFDA Number	Original Approved Award/Grant Amount	Accrued Revenue June 30, 2011	Prior Year Expenditures	Current Year Receipts	Current Year Expenditures	Accrued Revenue June 30, 2012
Safe and Drug Free Schools and Communities 112861-1011B	84.186	\$ 5,000	\$ 462	\$ 462	\$ 462	\$ -	\$ -
Title II, Part A - Improving Teacher Quality State Grants 110520-1011 120520-1112	84.367	27,997 24,225	6,934	27,997	6,934 18,711		5,514
Total Title II, Part A - Improving Teacher Quality State	Grants	52,222	6,934	27,997	25,645	24,225	5,514
Education Stabilization Funds 112525-1011	84.394	3,506	3,506	3,506	3,506		
Education Jobs 112545-1011 112545-1112	84.410A	92,226 6,967	29,856	92,226	29,856 6,967	6,967	-
Total Education Jobs		99,193	29,856	92,226	36,823	6,967	
Total United States Department of Education passed through Michigan Department of Education		358,735	60,968	208,502	162,765	132,574	30,777
Rural Education Grant 821-2011 821-2012	84.358	30,168 39,149	7,823	29,187	7,823 20,757	34,059	13,302
Total Rural Education Grant		69,317	7,823	29,187	28,580	34,059	13,302
Passed through Traverse Bay Area Intermediate School District Special Education I.D.E.A. Cluster Special Education I.D.E.A. Flowthrough ARRA 100455-1011 110455-1112	84.391	27,721 908	767	20,428	767 908	_ 908	-
Total Special Education I.D.E.A Cluster		28,629	767	20,428	1,675	908	

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

Year Ended June 30, 2012

		Original					
Federal Grantor/		Approved	Accrued				Accrued
Pass-Through Grantor CFI	DA .	Award/Grant	Revenue	Prior Year	Current Year	Current Year	Revenue
Program Title Num	nber	Amount	June 30, 2011	Expenditures	Receipts	Expenditures	June 30, 2012
Medicaid Outreach 93.7	778						
818		\$ 1,458	\$ -	\$ -	\$ 1,458	\$ 1,458	\$ -
Total passed through Traverse Bay Area Intermediate School District	_	30,087	767	20,428	3,133	2,366	
Total passed through United States Department of Education	on _	458,139	69,558	258,117	194,478	168,999	44,079
Total Federal financial assistance	_	\$ 834,374	\$ 103,132	\$ 291,691	\$ 533,424	\$ 511,660	\$ 81,368

NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

June 30, 2012

- **Note 1** The Schedule of Expenditures of Federal Awards is prepared using the modified accrual basis of accounting.
- **Note 2** Management has reported that expenditures in this Schedule of Expenditures of Federal Awards are equal to those amounts reported in the annual or final cost reports. Unallowed differences, if any, have been disclosed to the auditor.
- **Note 3** The financial reports, including claims or advances and reimbursements, and amounts claimed or used for matching are timely, complete and accurate and contain information that is supported by the books and records from which the basic financial statements have been prepared. Grant receipts reported on the Schedule of Expenditures of Federal Awards, as passed through the Michigan Department of Education, reconcile to the Grant Auditors Report (R7120). Unreconciled differences have been disclosed to the auditor.



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REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PEFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

Board of Education Frankfort-Elberta Area Schools

We have audited the financial statements of the governmental activities, each major fund and the aggregate remaining fund information of the *Frankfort-Elberta Area Schools* (the "School District") as of and for the year ended June 30, 2012, which collectively comprise the School District's basic financial statements and have issued our report thereon dated November 2, 2012. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States.

Internal Control Over Financial Reporting

Management of the School District is responsible for establishing and maintaining effective internal control over financial reporting. In planning and performing our audit, we considered the School District's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the School District's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the School District's internal control District's internal control over financial reporting.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and correct on a timely basis.

Our consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in internal control that might be deficiencies, significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses, as defined above.



Board of Education Frankfort-Elberta Area Schools Page 2

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the School District's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*, which are described in the accompanying Schedule of Findings and Questioned Costs as items 2012-1 and 2012-2.

The School District's response to the findings identified in our audit is described in the accompanying Schedule of Findings and Questioned Costs. We did not audit the School District's response and, accordingly, we express no opinion on it.

This report is intended solely for the information and use of the Board of Education, management, Michigan Department of Education, Federal awarding agencies and pass-through entities, and is not intended to be and should not be used by anyone other than these specified parties.

Dennis, Gartland & Niergarth

November 2, 2012



Certified Public Accountants Business Advisors

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INDEPENDENT AUDITORS' REPORT ON COMPLIANCE WITH REQUIREMENTS THAT COULD HAVE A DIRECT AND MATERIAL EFFECT ON EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE IN ACCORDANCE WITH OMB CIRCULAR A-133

Board of Education Frankfort-Elberta Area Schools

We have audited *Frankfort-Elberta Area School's* (the "School District") compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have a direct and material effect on each of the School District's major Federal programs for the year ended June 30, 2012. The School District's major Federal programs are identified in the summary of auditor's results section of the accompanying Schedule of Findings and Questioned Costs. Compliance with the requirements of laws, regulations, contracts and grants applicable to each of its major Federal programs is the responsibility of the School District's management. Our responsibility is to express an opinion on the School District's compliance based on our audit.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, Audits of *States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major Federal program occurred. An audit includes examining, on a test basis, evidence about the School District's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our audit provides a reasonable basis for our opinion. Our audit does not provide a legal determination of the School District's compliance with those requirements.

In our opinion, the School District complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major Federal programs for the year ended June 30, 2012. However, the results of our auditing procedures disclosed instances of noncompliance with those requirements, which are required to be reported in accordance with OMB Circular A-133 and which are described in the accompanying Schedule of Findings and Questioned Costs as items 2012-1 and 2012-2.



Board of Education Frankfort-Elberta Area Schools Page 2

Internal Control Over Compliance

Management of the School District is responsible for establishing and maintaining effective internal control over compliance with the requirements of laws, regulations, contracts and grants applicable to Federal programs. In planning and performing our audit, we considered the School District's internal control over compliance with requirements that could have a direct and material effect on a major Federal program to determine the auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the School District's internal control over compliance.

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a Federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a Federal program will not be prevented, or detected and corrected, on a timely basis.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be deficiencies, significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above.

The School District's response to the findings identified in our audit is described in the accompanying Schedule of Findings and Questioned Costs. We did not audit the School District's response and, accordingly, we express no opinion on it.

This report is intended solely for the information and use of management, the Board of Education, others within the entity, Michigan Department of Education, Federal awarding agencies and pass-through entities, and is not intended to be and should not be used by anyone other than these specified parties.

Dennis, Gartland & Niergarth

November 2, 2012

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

June 30, 2012

CURRENT YEAR

Section 1 - Summary of Auditors' Results

- 1. The auditor's report expresses an unqualified opinion on the financial statements of Frankfort-Elberta Area Schools (the "School District").
- 2. There were no significant deficiencies in internal control reported as a result of the audit of the financial statements.
- 3. No instances of noncompliance material to the financial statements of the School District were disclosed during the audit.
- 4. The auditor's report does not disclose any significant deficiencies in internal control over major programs.
- 5. The auditor's report on compliance for the major Federal award programs for the School District expresses an unqualified opinion on all major Federal programs.
- 6. There were no findings that are required to be reported in accordance with Section 510(a) of OMB Circular A-133.
- 7. The following programs are considered major programs:

Child Nutrition Cluster:	
School Breakfast Program	CFDA# 10.553
National School Lunch Program	CFDA# 10.555
Summer Food Service Program for Children	CFDA# 10.559

- 8. The threshold used for distinguishing between Type A and Type B programs was \$300,000.
- 9. Frankfort-Elberta Area Schools did not qualify as a low-risk auditee.

Section 2 - Findings in Accordance with Governmental Auditing Standards

No findings.

SCHEDULE OF FINDINGS AND QUESTIONED COSTS - Continued

June 30, 2012

Section 3 – Findings and Questioned Costs in Accordance with OMB Circular A-133

Finding 2012-1 (Child Nutrition Cluster: School Breakfast Program CFDA# 10.553; National School Lunch Program CFDA# 10.555; Summer Food Service Program for Children CFDA# 10.559; USDA Commodities CFDA #10.555) Eligibility

Criteria: All students who participate in the Federally funded food service program are required to complete an application to determine if they are eligible to receive a meal free of charge or at a reduced price. This application must be reviewed and approved by the appropriate food service personnel.

Condition: The Food Service Director effectively approved applications for ineligible students. Therefore, students were receiving benefits who were not eligible for them.

Questioned Costs: \$21,647. This is a conservative estimate of the total non-compliance based on a 100% review of applications. Further investigation of questionable items may reduce this amount.

Cause: The Food Service Director failed to properly review and validate the benefits to be received, if any, by each student participating in the program and controls were not in place to assure only eligible students were approved.

Effect: Some students improperly received the benefit of a free or reduced-price meal and the School District received reimbursement it was not entitled to receive.

Management's Response: The School District terminated the Food Service Director and began the process of determining the amount of reimbursements that were incorrectly claimed. 100% of applications were preliminarily-reviewed with a follow-up investigation planned. Further, work has begun on developing internal controls to prevent future non-compliance.

SCHEDULE OF FINDINGS AND QUESTIONED COSTS - Continued

June 30, 2012

Finding 2012-2 (Child Nutrition Cluster: School Breakfast Program CFDA# 10.553; National School Lunch Program CFDA# 10.555; Summer Food Service Program for Children CFDA# 10.559; USDA Commodities CFDA #10.555) Allowability

Criteria: Only meals served to a qualifying student should be claimed as a reimbursable expenditure under the Federal food service program.

Condition: Reimbursements were claimed for students who were not in attendance and could not have received a qualifying meal.

Questioned Costs: Known questioned costs based on a 100% test are less than \$10,000.

Cause: Proper controls were not in place to effectively monitor the number of meals that should have been claimed for reimbursement under the Federal food service program.

Effect: Reimbursement was claimed for meals which were not served.

Management's Response: The School District terminated the Food Service Director and began the process of determining the amount of reimbursements that were incorrectly claimed. A 100% comparison of claims and attendance records was made. Further, work has begun on developing internal controls to prevent future non-compliance.

PRIOR YEAR

Finding 2011-1 (Child Nutrition Cluster: School Breakfast Program CFDA# 10.553; National School Lunch Program CFDA# 10.555; Summer Food Service Program for Children CFDA# 10.559; USDA Commodities CFDA #10.555) Reporting

Criteria: All Michigan school districts providing a Federally funded food service program are required to submit monthly meal reimbursement claim forms within 10 days of the month following the claim month to the Michigan Department of Education.

Condition: The School District has not consistently filed timely monthly meal reimbursement claim reports with the Michigan Department of Education.

Cause: The School District has failed to submit all meal reimbursement claim reports within the 10 day timeframe as required by the Michigan Department of Education.

Effect: As a result of this, the School District receives delayed reimbursement for meal claims. The School District is also unable to properly budget for related revenues and expenditures without current and up-to-date information.

Management's Response: Management has met with the appropriate staff and expectation is that reports will be filed in a more timely fashion.

SCHEDULE OF FINDINGS AND QUESTIONED COSTS - Continued

June 30, 2012

Finding 2011-2 (Child Nutrition Cluster: School Breakfast Program CFDA# 10.553; National School Lunch Program CFDA# 10.555; Summer Food Service Program for Children CFDA# 10.559; USDA Commodities CFDA #10.555) Special Tests and Provisions – Coordinated Review Effort

Criteria: All Michigan school districts serving the National School Lunch Program must conduct an annual on-site review in each building each year prior to February 1. Also, all Michigan school districts serving the After School Snack Program must conduct two on-site reviews in each building each year. The first review must take place within the first four weeks of snack operation, and the second review must be completed after January 1. All review forms must be completed and retained by the School District.

Condition: The School District does not retain documentation supporting the required on-site reviews for the National School Lunch Program or the After School Snack Program.

Cause: The School District does not retain documentation supporting the required on-site reviews for the National School Lunch Program or the After School Snack Program.

Effect: The School District is unable to provide proof of the required on-site reviews and therefore, is unable to ensure compliance with internal requirements for the National School Lunch Program and the After School Snack Program.

Management's Response: Management has met with staff and provided the on-site review paperwork. It was stressed to staff the importance of completing the paperwork to meet this requirement.