

Alexander Central School District

Financial Management

SEPTEMBER 2020



OFFICE OF THE NEW YORK STATE COMPTROLLER
Thomas P. DiNapoli, State Comptroller

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Report Highlights

Alexander Central School District

Audit Objective

Determine whether the Board and District officials properly used and managed fund balance and reserves.

Key Findings

- While the Board and District officials used \$3.1 million in excess reserve funds as a financing source for a capital project, they did not do so in accordance with applicable statutes.
- Appropriations were overestimated by a total of \$7 million from 2015-16 through 2018-19.
- An average of \$500,000 of fund balance was appropriated each year, but was not used to finance operations. When unused appropriated fund balance is added back, surplus fund balance exceeded the limit each year by \$345,000 to \$611,000, or 2 to 3 percentage points.

Key Recommendations

- Adopt budgets that include reasonable estimates for appropriations and the amount of fund balance that will be used to fund operations.
- Use reserves in accordance with legal requirements.

District officials generally agreed with our findings and recommendations and indicated they have initiated or planned to initiate corrective action. Appendix B includes our comment on an issue raised in the District's response letter.

Subsequent Event

Our audit fieldwork was completed prior to the COVID-19 pandemic (pandemic). The District's 2019-20 projections and our audit work do not factor in the pandemic's financial effects.

Background

The Alexander Central School District (District) serves the Towns of Alexander, Batavia, Bethany and Darien in Genesee County and the Towns of Attica, Bennington and Middlebury in Wyoming County.

The five-member Board of Education (Board) is responsible for managing and controlling the District's financial and educational affairs. The Superintendent of Schools (Superintendent) is responsible for the District's day-to-day management under the Board's direction.

The Business Administrator oversees the District's business office and maintains financial records. The Board, Superintendent and Business Administrator are responsible for managing the District's resources.

Quick Facts

Enrollment	826
Employees	162
2019-20 Appropriations	\$18.2 million

Audit Period

July 1, 2015 – February 21, 2020

Financial Management

What Is Proper Financial Management?

To properly manage financial condition, a board should adopt accurate and structurally balanced budgets based on historical or known trends in which recurring revenues finance recurring expenditures. In preparing the budget, a board must estimate the amounts a school district will spend and receive, the amount of fund balance¹ that will be available at year-end to use towards the next year's budget and the expected real property tax levy. Accurate estimates help ensure that the tax levy is not greater than necessary.

A board is permitted to retain a specified amount of fund balance for cash flow needs or unexpected expenditures and reserves for other identified or planned needs. New York State Real Property Tax Law² currently limits the amount of surplus fund balance³ that a school district can retain to no more than 4 percent of the next year's budget. Any surplus fund balance over this percentage must be used to reduce the upcoming fiscal year's real property levy or to fund needed reserves.

The Board and District Officials Overestimated Appropriations

We compared budgeted appropriations and estimated revenues with actual operating results for 2015-16 through 2018-19 and found that revenue variances were reasonable. In contrast, appropriations were overestimated by an average of almost \$1.8 million (11 percent) each year, or a total of \$7 million (Figure 1). However, budget estimates appeared to be improving from 2015-16 through 2018-19 and were more consistent with actual expenditures.

Figure 1: Overestimated Appropriations

	2015-16	2016-17	2017-18	2018-19	Totals
Appropriations^a	\$17,234,000	\$17,502,000	\$18,015,000	\$17,712,000	\$70,463,000
Actual Expenditures	\$15,525,000	\$15,248,000	\$16,004,000	\$16,654,000	\$63,431,000
Overestimated Appropriations	\$1,709,000	\$2,254,000	\$2,011,000	\$1,058,000	\$7,032,000
Percentage Overestimated^b	11%	15%	13%	6%	11%

a These amounts include encumbrances, which are prior fiscal year funds scheduled to be paid or disbursed in the current fiscal year and recorded with the current fiscal year's expenditures.

b Overestimated appropriations divided by actual expenditures

1 Fund balance is the difference between revenues and expenditures accumulated over time.

2 Real Property Tax Law Section 1318

3 Surplus fund balance is defined as unrestricted fund balance minus appropriated fund balance and encumbrances included in committed and assigned fund balance. See our accounting bulletin at <https://www.osc.state.ny.us/localgov/pubs/releases/gasb54.pdf>

The most significant overestimated appropriations were for employee benefits (\$3.1 million or 22 percent) and teaching – regular school (\$2.1 million or 12 percent).⁴ The Business Administrator told us they budgeted conservatively because they might not have new benefit rates or know whether they will continue to receive federal grant funding for instructional salaries.

The Board and District officials decreased appropriations in 2018-19. However, based on our projection of the 2019-20 budget, the District likely will finish the year with a budget variance of approximately \$1 million, which is similar to the previous year.

In early 2019-20, after the budget was approved, the District had unplanned staffing changes. Therefore, based on the Superintendent’s recommendation, the Board adopted a resolution in August 2019 reducing the levy included in the adopted budget by approximately \$40,000.

The Board and District Officials Appropriated Fund Balance That Was Not Needed

Because the Board and District officials overestimated appropriations, it appeared that they needed to appropriate fund balance⁵ to close projected budget gaps. In the 2015-16 through 2018-19 budgets, the Board and District officials annually appropriated an average of \$500,000 of fund balance that was not needed to finance operations. They continued this pattern with the 2019-20 budget by appropriating \$600,000 of fund balance that will likely not be needed as a financing source.

When fund balance is appropriated for the next year’s budget, the expectation is that there will be a planned operating deficit⁶ equal to the amount of fund balance that was appropriated. However, primarily due to overestimated appropriations, the District experienced annual operating surpluses resulting in a four-year cumulative operating surplus totaling approximately \$5 million.

The Board and District officials’ practice of annually appropriating fund balance that is not needed to finance operations is, in effect, a reservation of fund balance that is not provided for by statute and is a circumvention of the statutory limit imposed on the level of surplus fund balance. When unused appropriated fund balance is added back, surplus fund balance exceeded the limit each year by \$345,000 to \$611,000, or 2 to 3 percentage points (Figure 2).

...[T]he Board and District officials annually appropriated an average of \$500,000 of fund balance that was not needed to finance operations.

4 The average overestimated appropriation for employee benefits was \$777,000 per year and for teaching – regular school was \$514,000 per year.

5 An appropriation of fund balance is the use of unexpended resources from prior years to finance appropriations contained in the current budget and is considered a one-time financing source.

6 A planned operating deficit occurs when a portion of fund balance from previous years is used to finance the next year’s appropriations.

Figure 2: Recalculated Surplus Fund Balance as of Fiscal Year-End

	2015-16	2016-17	2017-18	2018-19
Surplus Fund Balance	\$618,000	\$700,000	\$706,000	\$694,000
Unused Appropriated Fund Balance	\$428,000	\$368,000	\$613,000	\$601,000
Recalculated Surplus Fund Balance	\$1,046,000	\$1,068,000	\$1,319,000	\$1,295,000
Maximum Fund Balance Allowed	\$701,000	\$720,000	\$708,000	\$729,000
Fund Balance in Excess of Limit	\$345,000	\$348,000	\$611,000	\$566,000
Next Year's Budget	\$17,521,000	\$17,998,000	\$17,705,000	\$18,225,000
Recalculated Surplus Fund Balance as a Percentage of Next Year's Budget	6%	6%	7%	7%

The Board maintained a stable tax levy that increased by \$236,000 (4 percent) from 2016-17 to 2019-20, an average of less than 1 percent each year. However, budgeting practices that produce operating surpluses and maintain fund balances in excess of the amounts allowed by law can result in real property tax levies that are greater than necessary to fund operations. The Board and District officials should consider adopting more realistic budgets with more accurate estimates of fund balance needed and consider lowering the tax levy, or using excess funds to fund one-time expenditures, fund needed reserves or pay off debt.

How Should the Board Properly Use Reserve Funds?

School districts are authorized by law to establish reserve funds for certain future purposes (e.g., capital project or retirement expenditures). If a board determines that a reserve fund has amounts in excess of what is needed or required, the board and school district officials may reduce reserves to reasonable levels while complying with the legal requirements specific to each reserve.

According to New York State General Municipal Law (GML),⁷ if a school district has a retirement contribution reserve fund, the board may, by resolution,⁸ authorize the transfer of a portion of the funds in the retirement contribution reserve fund to another authorized reserve fund.⁹ GML allows funds to be transferred from a retirement contribution reserve fund to a capital reserve fund that has been established by a school district in accordance with Education Law.¹⁰ Typically, voter approval is required for a school district to establish a capital reserve fund.

7 GML Section 6-r

8 Before adopting the board resolution, the board must hold a public hearing, which must be announced in the school district's official newspaper. Also, the notice should appear in the newspaper at least 15 days before the date that the hearing is scheduled to be held.

9 GML Sections 6-c, 6-d, 6-e, 6-f or 6-g and New York State Education Law Section 3651

10 Education Law Section 3651

In addition, according to GML, a school district may transfer excess funds from a workers' compensation reserve fund¹¹ and an unemployment insurance payment reserve fund¹² to another reserve fund, or it may apply any portion of the excess funds to the budget appropriation of the next succeeding fiscal year.

The Board and District Officials Did Not Use Reserves in Accordance With Statute

In December 2014, voters approved a \$6.8 million capital project for building reconstruction and improvements to be funded by using \$615,000 from existing capital reserves, \$540,000 from available funds and by issuing debt.

The Business Administrator told us that the Board decided to use fund balance and excess reserves identified in our 2016 audit report¹³ to fund the project instead of issuing debt. However, the Board did not amend the bond resolution to reflect this decision, or otherwise adopt a resolution to formalize the project's updated financing plan. As a result, the change in funding sources was not recorded in the Board's minutes.

In May 2016, voters approved a \$1.3 million transfer from the retirement contribution reserve fund to the capital projects fund. In June 2017, the Board adopted a resolution to transfer excess funds from the workers' compensation reserve fund (\$950,000) to the capital projects fund. Also, the Board adopted a resolution to transfer excess funds from the unemployment insurance payment reserve fund (\$860,000) to the capital projects fund.

However, according to GML, these funds could be transferred only to certain other reserve funds, not to the capital projects fund, which is not a reserve fund. If the Board's intent was to transfer money into a capital reserve fund, the Board should have established a capital reserve in accordance with Education Law.¹⁴ Then it should have transferred the funds to the properly established capital reserve, instead of transferring the funds into the capital projects fund.¹⁵

While we commend District officials for using excess reserves to benefit taxpayers, it is important to ensure that the use of reserve funds is in accordance with statute and clearly communicated to taxpayers.

Our fieldwork was completed in February 2020, prior to the start of the pandemic. Given the negative financial effect of the pandemic, it is even more important for District officials to develop and monitor appropriate annual budgets.

If the Board's intent was to transfer money into a capital reserve fund, the Board should have established a capital reserve in accordance with Education Law.

11 GML Section 6-j

12 GML Section 6-m

13 *Alexander Central School District - Financial Condition (2015M-227)*, issued in February 2016

14 Education Law Section 3651

15 Capital reserves are typically reported as restricted fund balance in the capital projects fund.

What Do We Recommend?

The Board and District officials should:

1. Develop and adopt budgets that include realistic estimates for appropriations and the amount of fund balance that will be used to fund operations.
2. Discontinue the practice of appropriating fund balance that is not needed or used to fund operations.
3. Use reserves in accordance with legal requirements.
4. Ensure that financing plans for capital projects are properly documented in the Board's minutes.

Appendix A: Response From District Officials



Alexander Central School District

The mission of the Alexander Central School District is to challenge students to be confident, contributing learners within a structured, safe and caring environment.

Catherine Huber, Ed.D.
Superintendent

July 14, 2020

Tim Batzel
Business Administrator
Supervisor, Buildings & Grounds

Jeffrey D. Mazula, Chief Examiner
New York State Comptroller
Buffalo Regional Office
295 Main Street, Suite 1032
Buffalo, New York 14203-2510

Shannon Whitcombe
Principal, Secondary School

Jason Jacobs
Assistant Principal,
Secondary School

Jared Taft
Principal, Elementary School

Alexander Central School District is in receipt of the New York State Office of the State Comptroller's draft report entitled "Alexander Central School Financial Management". The audit period is July 1, 2015 to February 21, 2020.

Kathy Busch
Director, Pupil Personnel

Ryan Keating
Director, Curriculum &
Instruction

Key recommendations:

Robert Adams
Director, Athletics

Matthew Perry
Director, Technology

Shea Schreiber
Supervisor, Transportation

Jim Tyx
Supervisor, Food Service

- Develop and adopt budgets that include realistic estimates for expenditures.
- Discontinue the practice of adopting budgets that appropriate fund balance that is not needed or used to fund District operations.
- Proper use of reserve funds.

District response and corrective action:

These times are unprecedented for school districts. The systems around all district functions - including teaching and learning - have been upended by the COVID-19 health crisis. The uncertain financial and public health landscape offer a unique context for our District as we continue to strive to create the best educational conditions possible for our students in alignment with our District goals and the expectations of our taxpayers. When the Board of Education adopted the budget for the 2019-2020 school year, the District could never have predicted the financial impact from the COVID-19 pandemic.

Our current public health landscape and the financial impact on school districts as well as the uncertain nature of school funding makes a response to the Comptroller's audit particularly challenging. Our District has consistently taken a conservative approach to budgeting that includes taking a long-term view in our budgeting processes and the strategic use of our reserves. These practices have served our taxpayers well - especially now as our District faces this

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unprecedented and uncertain time. This approach and planning for the use of taxpayer funds to weather uncertain financial times is in alignment with comments from Comptroller DiNapoli who, on December 13, 2019, noted that “the time to prepare for serious fiscal problems is before they arrive.” Our District has engaged in this type of responsible, conservative budgeting that allows us to weather uncertain financial times while maintaining staff and programs and historically keeping our tax levy in the 1% range. While no one could have predicted our current public health crisis, our District has planned and budgeted in a manner that allows us to continue to provide the educational program our students and community deserve.

The District utilizes conservative budgeting practices to guarantee that educational services can be provided to the students throughout the year regardless of circumstance. The District will continue to review actual expenditures while developing annual budgets. The District will construct future budget expenditures based on prior year actual expenditures. The District will develop budgets that only appropriate the fund balance needed or used to fund District operations.

The District will continue to monitor fund balances. The Board of Education will appropriate reserves to help offset the loss of projected state aid caused by the COVID-19 pandemic. The District’s conservative budget practices allow us to maintain programs and staff during the current New York State fiscal crisis.

The District appreciates the report commending the Board of Education’s use of reserves to benefit the taxpayer. The District will continue to use reserves according to General Municipal Law. Transfers from reserves will be approved by the Board of Education and transferred according to Education Law. The District did have the taxpayers approve transfers to the capital project but transfers from the employee retirement reserve should have been transferred by the Board of Education following a public hearing. The District will ensure that the financing plans are properly documented in Board minutes.

The Alexander Board of Education and administration would like to thank the New York State Comptroller and examiner for a professional and comprehensive audit process. The District will make every effort to reasonably project expenses, maintain appropriate fund balance levels, and transfer reserves according to General Municipal Law. The Board of Education and administration will

See
Note 1
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continue to develop fiscally responsible budgets to provide our students and community with the schools they deserve.

Sincerely,

Catherine Huber, Ed.D.
Superintendent

Brian Paris
Board President

Corrective Action Plan

For each recommendation included in the New York State Comptroller Audit, the following is the Alexander Central School District's corrective action(s) taken or proposed. For recommendations where corrective action has not been taken or proposed, we have included the following explanations.

(A)

- 1) **Audit Recommendation:** Develop and adopt budgets that include realistic estimates of expenditures and use of fund balance in the annual budget.
- 2) **Implementation Plan of Action(s):** District will develop realistic budget estimates by using zero based budgeting. The current 2020-21 budget salary estimates have been calculated as actual. The district is currently using Appropriated Reserved Fund Balance to balance the current budget.
- 3) **Implementation Date:** July 14, 2020
- 4) **Person Responsible for Implementation:** Dr. Catherine Huber, Superintendent of Schools; Tim Batzel, Business Administrator; Alexander Board of Education.

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(B)

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Robert Adams
Director, Athletics

Matthew Perry
Director, Technology

Shea Schreiber
Supervisor, Transportation

Jim Tyx
Supervisor, Food Service

- 1) **Audit Recommendation:** The Alexander School District should discontinue the practice of adopting budgets that appropriate fund balance that is not needed or used to fund District operations.
- 2) **Implementation Plan of Action(s):** The Alexander Central School District will continue to utilize conservative budget practices to guarantee educational service will be provided to all students. The District will review actual expenditure while developing future budgets to ensure a reasonable amount of appropriated reserved fund balance is maintained.
- 3) **Implementation Date:** July 14, 2020
- 4) **Person Responsible for Implementation:** Dr. Catherine Huber, Superintendent of Schools; Tim Batzel, Business Administrator; Alexander Board of Education.

(C)

- 1) **Audit Recommendation:** Proper use of Reserve funds
- 2) **Implementation Plan of Action(s):** The Alexander Central School District will use Reserve funds according to General Municipal Law and Department of Education.
- 3) **Implementation Date:** July 14, 2020
- 4) **Person Responsible for Implementation:** Dr. Catherine Huber, Superintendent of Schools; Tim Batzel, Business Administrator; Alexander Board of Education.

Catherine Huber, Ed.D., Superintendent

July 14, 2020

Tim Batzel, Business Administrator

July 14, 2020

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Appendix B: OSC Comment on the District's Response

Note 1

As indicated in the report, transfers from the retirement contribution, unemployment insurance payment and workers' compensation reserves can be made only to certain authorized reserve funds and not to the capital projects fund, which is not a reserve.

Although the Board obtained voter approval for the transfer made from the retirement contribution reserve, voter approval does not eliminate the requirement that the transfer must be made into a reserve fund.

Appendix C: Audit Methodology and Standards

We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law. To achieve the audit objective and obtain valid audit evidence, our audit procedures included the following:

- We interviewed District officials and reviewed policies, procedures and Board minutes to gain an understanding of the District's financial management practices.
- We reviewed the bond resolution for the voter-approved capital project and transfers to the capital projects fund to assess whether project funding agreed with the bond resolution.
- We reviewed all reserve fund activity to assess whether funds were transferred in compliance with applicable laws.
- We reviewed the adopted general fund budgets from 2015-16 through 2018-19 to determine whether they were reasonable and structurally balanced by comparing adopted budgets with actual results of operations and analyzing significant budget-to-actual variances.
- We compared the adopted 2019-20 general fund budget with actual results of operations through December 31, 2019 and projected results through June 30, 2020 to determine whether similar budgeting and expenditure patterns existed.
- We calculated the general fund's surplus fund balance for the 2015-16 through 2018-19 fiscal years and the percentage of the next year's budgeted appropriations to determine whether the District was in compliance with Real Property Tax Law.
- We reviewed tax warrants to analyze tax levy trends and determine whether the tax levy changed after the budget was approved by voters.

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Unless otherwise indicated in this report, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or size of the relevant population and the sample selected for examination.

The Board has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report must be prepared and provided to our office within 90 days, pursuant to Section 35 of General Municipal Law, Section 2116-a(3)(c) of New York State Education Law and Section 170.12 of the Regulations of the Commissioner of Education. To the extent practicable, implementation of the CAP must begin by the end of the next fiscal year. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. The CAP should be posted on the District's website for public review.

Appendix D: Resources and Services

Regional Office Directory

www.osc.state.ny.us/sites/default/files/local-government/documents/pdf/2018-12/regional_directory.pdf

Cost-Saving Ideas – Resources, advice and assistance on cost-saving ideas

www.osc.state.ny.us/local-government/publications?title=&body_value=&field_topics_target_id=263196&issued=All

Fiscal Stress Monitoring – Resources for local government officials experiencing fiscal problems

www.osc.state.ny.us/local-government/fiscal-monitoring

Local Government Management Guides – Series of publications that include technical information and suggested practices for local government management

www.osc.state.ny.us/local-government/publications?title=&body_value=&field_topics_target_id=263206&issued=All

Planning and Budgeting Guides – Resources for developing multiyear financial, capital, strategic and other plans

www.osc.state.ny.us/local-government/resources/planning-resources

Protecting Sensitive Data and Other Local Government Assets – A non-technical cybersecurity guide for local government leaders

www.osc.state.ny.us/sites/default/files/local-government/documents/pdf/2020-05/cyber-security-guide.pdf

Required Reporting – Information and resources for reports and forms that are filed with the Office of the State Comptroller

www.osc.state.ny.us/local-government/required-reporting

Research Reports/Publications – Reports on major policy issues facing local governments and State policy-makers

www.osc.state.ny.us/local-government/publications?title=&body_value=&field_topics_target_id=263211&issued=All

Training – Resources for local government officials on in-person and online training opportunities on a wide range of topics

www.osc.state.ny.us/local-government/academy

Contact

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