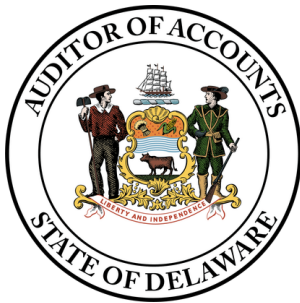




APPOQUINIMINK SCHOOL DISTRICT

LOCAL FUNDS PERFORMANCE AUDIT
FISCAL YEAR ENDED JUNE 30, 2024



APPOQUINIMINK SCHOOL DISTRICT LOCAL FUNDS PERFORMANCE AUDIT REPORT SUMMARY FOR FISCAL YEAR ENDED JUNE 30, 2024

BACKGROUND

Performance audits are used to evaluate the efficiency and effectiveness of an organization's operations. The objective of this performance audit is to provide management, the Appoquinimink School District Board of Education and the State of Delaware with information to improve performance, public accountability, and transparency.

The purpose of this performance audit is to determine whether the District's operations over the collection and spending of local school district property tax funds complied with relevant laws and regulations. Our performance audit addressed the following areas:

- The tax rate setting process
- Payments for services and supplies
- Employee compensation and payroll processing

The Auditor of Accounts is mandated by 29 Del. C., §2906(f) to perform annual audits of local school district tax funds. Under Delaware Code¹, school districts may levy and collect taxes for school purposes upon the assessed value of all taxable real estate in the district.

KEY INFORMATION AND FINDINGS

Performance audit testing of the rate-setting process revealed the District's management and Board of Education analyzed expected spending and set the FY 2024 tax rates to provide adequate revenues, as summarized here.

- The District's FY 2024 current expense tax rate was set by referendum in 2019. On April 23, 2024 an operating referendum was passed effective for FY 2025
- Revenues from the District's debt service and tuition tax rates were consistent with expenditures.
- The District's debt service reserve of \$10,320,881 as of June 30, 2024 complied with the State of Delaware requirements.

Appoquinimink School District Quick Facts

K-12 Schools

16

Special Schools

5

Students Served

12,945

Employees

1,500



APPOQUINIMINK SCHOOL DISTRICT LOCAL FUNDS PERFORMANCE AUDIT REPORT SUMMARY FOR FISCAL YEAR ENDED JUNE 30, 2023

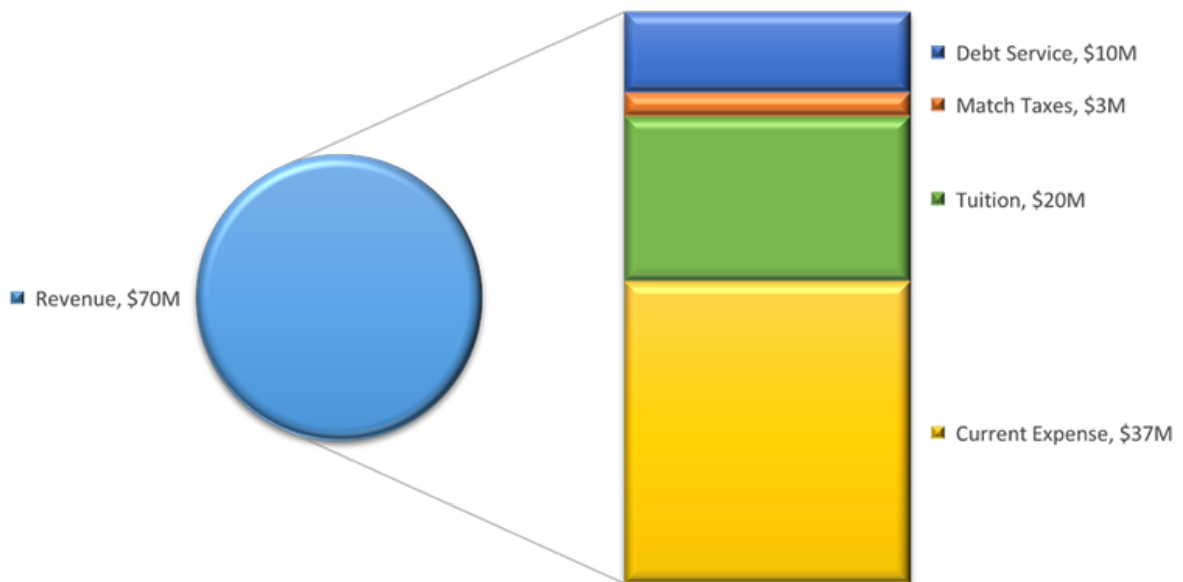
KEY INFORMATION AND FINDINGS CONTINUED

SOURCES OF REVENUE FOR FY24



The District allocates the local property tax funds received by their intended purpose (current expense, debt service, tuition, and match taxes). We found that the allocation was consistent with the tax rates approved by the Board of Education. The four components of local school tax revenue allocations are summarized below:

Local School Tax Revenue Allocation (in \$ millions)





APPOQUINIMINK SCHOOL DISTRICT LOCAL FUNDS PERFORMANCE AUDIT REPORT SUMMARY FOR FISCAL YEAR ENDED JUNE 30, 2023

KEY INFORMATION AND FINDINGS CONTINUED

Findings may involve deficiencies in internal control; noncompliance with provisions of laws, regulations, contracts, and grant agreements; or instances of fraud. Performance audit testing of the District's expenditures did not uncover fraud, waste or abuse. The audit relied on various sources of information and methods to obtain an understanding of and assess Local Funds' processes for the School District, including inquiry, document reviews, risk assessment, and identification and performance assessment of key controls.

Testing identified the following conditions that are reported as findings:

- District purchases of professional services, supplies and equipment and repairs service did not follow state procurement laws.
- District reserves were not enough to cover payroll expenditures through October 15th with a surplus equal to one month's local payroll of the following year as required by Delaware state code.
- District documentation of payroll changes and review did not comply with Districts policies and procedures.

The potential exposure to the State of the weaknesses in the purchasing internal controls is that they increase the risk that the District would make purchases without first obtaining the best prices and terms.

The exposure from District reserves not being enough to cover payroll expenditures through the period as required by Delaware state code is that the District's financial stability may be impaired.

The exposure from District documentation of payroll changes and review not complying with Districts policies and procedures is that the District risks erroneous or fraudulent transactions being processed in the payroll system.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT AND
INDEPENDENT AUDITOR'S REPORT

JUNE 30, 2024

APPOQUINIMINK SCHOOL DISTRICT
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JUNE 30, 2024

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Independent Auditor's Report

Dr. Matthew Burrows, Ed. D., Superintendent
Appoquinimink School District
118 S. Sixth Street
Odessa, Delaware 19730

Dear Dr. Burrows:

We present the attached report which provides the results of our performance audit of the Appoquinimink School District's Local Funds' design and operation of internal controls and compliance with applicable State and District regulations and policies during the year ended June 30, 2024. The Office of Auditor of Accounts engaged Belfint, Lyons & Shuman, P.A. to conduct a Performance Audit of the Appoquinimink School District's Local Funds under OAOA Contract Number 22-CPA01_SDLOCALFUNDS.

The Office of Auditor of Accounts is authorized under 29 Del. C., §2906(f) to perform post-audits of local school district tax funds' budget and expenditures. The Appoquinimink School District's management is responsible for the design and operation of internal controls over Local Funds and compliance with the applicable Delaware Code sections.

We conducted this performance audit in accordance with *Government Auditing Standards* as issued by the Comptroller General of the United States. 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Government Auditing Standards requires the auditor to perform limited procedures on the District's response to the findings identified in our audit and described in the accompanying *Schedule of Findings and Recommendations*. The District's response was not subject to the other auditing procedures applied in the performance audit.

This report is intended solely for the information and use of the Appoquinimink School District, the Delaware Department of Education, and the Office of Auditor of Accounts, and is not intended to be, and should not be, used by anyone other than these specified parties. Under 29 Del. C. §10002(o), this report is a matter of public record, and its distribution is not limited. This report, as required by statute, will be provided to the Office of the Governor, Office of the Controller General, General Assembly, Office of the Attorney General, and Office of Management and Budget.

Belfint, Lyons & Shuman, P.A.

April 28, 2026
Wilmington, Delaware

cc: Lydia E. York, Esq., CPA - State Auditor
Alleesa Stewart, MBA - Director of Finance

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

PERFORMANCE AUDIT OVERVIEW

Performance audits are audits that provide findings or conclusions based on an evaluation of sufficient, appropriate evidence against criteria. Performance audits provide objective analysis to assist management and those charged with governance and oversight in using the information to improve program performance and operations, reduce costs, facilitate decision making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability.

BACKGROUND

Overview - Any Delaware School District may, in addition to the amounts apportioned to it by the Delaware Department of Education (DOE) or appropriated to it by the General Assembly, levy and collect additional taxes for school purposes upon the assessed value of all taxable real estate in the district except real estate exempt from taxation per 14 Del. C., §1902¹. The purpose of this performance audit is to determine whether internal controls over the collection and use of these real estate tax funds were designed and operated in accordance with Delaware law and District policy. For purposes of this report, real estate taxes levied for school purposes are referred to as “Local Funds.” Although there are other types of Local Funds, they are not included in the scope of our performance audit.

Laws and Regulations - The School District’s authority to levy taxes is governed by 14 Del. C., Ch. 19 for nonvocational districts. The legislative provisions and other policies relevant to local school taxes are summarized below. There are four categories of local school taxes: current expense, debt service, tuition, and match taxes summarized as follows:

Current Expense - Current expense tax rates are levied for general operation expenses incurred by the school district. Rate increases are approved via voter referendum.

Debt Service - Debt service tax rates are levied to cover the local share of the principal and interest payments on bonds funding major capital projects which, per Delaware Administrative Code Section 401, *Major Capital Improvement Program*, are projects costing \$1,000,000 or more. The local share of major capital projects is between 20% and 40% of the total cost per 29 Del. C., §7503(b) with the remaining balance financed by the State of Delaware. The project must be approved by the DOE, and bond issuances are authorized via voter referendum. Per 14 Del. C §2116 and §2118(a), with a passing referendum, districts are authorized to levy a debt service tax sufficient to cover the local share of annual principal and interest payments plus 10% for expected delinquencies.

¹ 14 Del. § 1902 authorizes School Districts to levy taxes for school purposes.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

BACKGROUND - CONTINUED

Laws and Regulations - Continued

Debt Service - Continued

The District is required to maintain debt service reserves, within a range of at least four months to no more than 110% of the following fiscal year's debt service payments based on the following opinions issued by the State of Delaware Attorney General:

- Attorney General Opinion 89-I017 from 1989 stated that, per the DOE, a sufficient reserve is at least four months of the following fiscal year's debt service payments.
- Attorney General Opinion 1W-024 from 1975 stated that a reserve is considered excessive when it is greater than 110% of total debt expenditures in the following year as districts' powers to levy taxes for debt service are limited per 14 Del. C., §2116 and §2118(a) to principal and interest and 10% for delinquencies.

Tuition - Tuition tax rates are levied to cover educational expenses for in-district and out-of-district placements of students in special programs and schools. The rate is set annually by the school board based on anticipated needs in the district and does not require a voter referendum.

Match - Match funds provide a local match to State appropriations where required or allowed by law. Examples of Match programs include technology, minor capital improvements (MCIs), extra time, reading and math resource teachers, student success block grant, opportunity fund, and substitute teacher block grant. The following summarizes the significant match taxes authorized for the year ended June 30, 2024:

Technology - These funds are intended to support the purchase and replacement of technology, technology maintenance through personnel or services, professional learning, or other technology needs intended to improve the school district. The FY 1999 Bond and Capital Improvements Act authorized appropriations for education technology and authorized school districts to indefinitely levy up to one half of the rate required to meet the district's match. Technology match taxes are currently set by a DOE memo issued in December 1998.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

BACKGROUND - CONTINUED

Laws and Regulations - Continued

Match - Continued

Minor Capital Improvements - Per Delaware Administrative Code 405, *Minor Capital Improvement Program*, minor capital pertains to projects costing less than \$1,000,000, intended to keep assets in their original condition. The maximum local share for minor capital expenditures is 40% per 29 Del. C., §7528(b). The State of Delaware provides the remaining balance up to a maximum dollar amount which is included in the Delaware Capital Budget annually.

Enhanced Minor Capital Improvements - The FY 2023 State of Delaware Capital Budget appropriated additional minor capital improvements funds to the school districts. The funds are not subject to the \$1,000,000 minor capital improvement restriction. An amendment to the FY 2023 State of Delaware Capital Budget authorizes districts to assess a local match on a 60% state and 40% local basis either in one fiscal year or over multiple fiscal years through fiscal year ending June 30, 2025. Districts must obligate their minor capital improvement funds prior to utilizing the enhanced minor capital improvement funds, except for the purpose of remediating lead contaminated drinking water infrastructure.

Extra Time and Reading Resource and Math Resource Teachers - In accordance with 14 Del. C., §1902(b), the FY 2024 Operating Budget Epilogue Sec. 348 authorizes school districts to levy a local match for Extra Time as well as Reading Resource Teachers and Mathematics Resource Teachers which were originally established by the following:

- Per the FY 2008 Operating Budget Epilogue, the extra time appropriation is intended for additional instruction for low achieving students and school districts were encouraged to match on a 70% state and 30% local basis.
- Per the FY 2010 Operating Budget Epilogue, the reading and math resource teacher appropriations are intended to fund state salaries for resource teachers in each school and districts were encouraged to match on a 70% state and 30% local basis.

Student Success Block Grant - The FY 2024 Operating Budget Epilogue Sec. 357 authorizes school districts to assess a local match for costs relating to the Student Success Block Grant appropriations, which are intended for reading assistance in grades K through 4.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

BACKGROUND - CONTINUED

Laws and Regulations - Continued

Match - Continued

Opportunity Fund - The FY 2024 Operating Budget Epilogue Sec. 354 authorizes school districts to assess a local match for costs associated with the Opportunity Fund appropriations intended to enhance services and provide additional supports to English Learner and low-income students, as well as be used for mental health services and/or for additional reading supports for grades K through 5. Per a June 2019 DOE Memo, schools are allowed to match on a 70% state and 30% local basis.

Substitute Teacher Block Grant - The State of Delaware FY 2024 Operating Budget Epilogue Sec. 370 authorizes school districts to assess a local match for costs associated with the Substitute Teacher Block Grant appropriations, which are intended to fund salaries for full-time substitute teachers in high need elementary, middle and high schools, with populations of 50 percent or more low-income students.

Capitation - Districts may also levy a school capitation tax on all persons 18 years of age and older, determined by the board, provided that such school capitation tax is approved by the voters of the district in the same manner as required for the levy of taxes on the assessed value of real estate, per 14 Del. C., §1912.

Year-End Required Reserves - Districts are required by 14 Del. C., §1507 to hold sufficient local reserves at the end of each fiscal year to satisfy the local portion of payroll expenditures during the period from July 1st through October 15th of the subsequent fiscal year with a surplus equal to one month's payroll expenditures after adjusting for 75% equalization funding (referred to as Division III Funding) expected to be received. If a deficit is projected, the District must report its plan to meet payroll. If the surplus is less than one month's local payroll, the District must report its plan to ensure a sufficient balance in the following year.

DISTRICT SPECIFIC SUMMARY

The Appoquinimink School District, located in New Castle County, operates PK-12 schools with over 12,900 students and also provides adult continuing education services. The Appoquinimink School District employs over 1,500 employees to educate and support its students. Appoquinimink has five early education centers, nine elementary schools, four middle schools, and three high schools. The Appoquinimink District Board of Education is the governing body of the District. The School Board includes five elected members who serve four-year terms. For the purposes of this report, Appoquinimink School District is referred to as the "School District" or the "District."

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT OBJECTIVES

The objectives established for the performance audit of the School District were:

Objective 1 - School District internal controls over the expenditure of Local Funds were designed and operated in accordance with the requirements of the *Delaware Code*, State of Delaware *Administrative Code*, State of Delaware *Budget and Accounting Policy Manual (BAM)*, School District Accounting Policies, and the School District Budget (the requirements).

Objective 2 - School District internal controls over the receipt of Local Funds were designed and operated in accordance with the requirements.

Objective 3 - School District real estate taxes were approved and calculated in accordance with the requirements.

Objective 4 - School District tuition tax funds are calculated and spent in accordance with the requirements.

AUDIT SCOPE

The period covered by the Performance Audit was July 1, 2023 through June 30, 2024. We sampled and examined transactions from the populations of expenditures and receipts of Local Funds for the period from July 1, 2023 through June 30, 2024. In sampling these transactions, we relied on documentation provided by the School District, the DOE, and the State of Delaware's financial accounting and human resources systems.

AUDIT METHODOLOGY

To address the audit objectives of this performance audit, we performed the following procedures:

- A. Planning Phase: The audit relied on various sources of information and methods to properly plan the audit and to obtain an understanding of and assess Local Funds' processes for the School District, including the following:
 - 1. Reviewed the applicable sections of the *Delaware Code*, State of Delaware *Administrative Code*, State of Delaware *BAM*, School District Accounting Policies, and the School District Budget to gain an understanding of the legal and policy requirements governing Local Funds.
 - 2. Inquired about whether there were any findings and recommendations in reports resulting from previous audits that relate to the objectives of this audit and whether the recommendations have been implemented.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT METHODOLOGY - CONTINUED

3. Reviewed the Board of Education's meeting minutes for the audit period to identify unusual transactions or matters which impact activities funded by the District's Local real estate tax funds.
4. Identified and reviewed contracts, agreements, and other important documents.
5. Performed risk assessment procedures such as:
 - a. Obtained and documented an understanding of the School District and its environment.
 - b. Completed engagement team discussions, including discussions about the possibility of error or fraud involving Local Funds.
 - c. Made inquiries of management and others about risks (including fraud risks, related-party transactions, unusual transactions, and compliance with laws, regulations, contracts, and grant agreements).
 - d. Obtained and documented an understanding of the School District's internal control system over Local Funds by performing walkthroughs.
6. Identified key internal controls over the District's Local Funds for testing.
7. We determined that we could rely on the internal controls in the State's First State Financials Accounting System (FSF) and the State's Payroll Human Resource Statewide Technology (PHRST) system for our Performance Audit. This conclusion was based on our review of the following documents:
 - a. The State's System and Organizational Controls (SOC 1), Type II Report: Covering the period from April 1, 2023 through March 31, 2024, issued by the State's Independent Service Auditor.
 - b. The State's Management Confirmation (Bridge Letter): Covering the subsequent period from April 1, 2024 through June 30, 2024, issued by the Department of Finance.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT METHODOLOGY - CONTINUED

- B. Performance Assessment: Based on the information gathered, we developed the following risk-based approach to assess the design and operation of internal controls over Local Funds with respect to the audit objectives and the requirements as defined previously. The following chart provides a summary of the Performance Assessment procedures performed:

Objective	Testing Procedures	Key Areas Tested	Requirements Assessed
Objective 1: Expenditure Controls			
	Disbursement testing, procurement testing, and payroll testing.	Design and operation of controls over Local funds' and Local Tuition Tax funds' disbursements, including tests of purchasing cards, single payment suppliers, and procurement. Design and operation of controls over Local funds' and Local Tuition Tax funds' payroll, including payroll changes, and approvals.	Delaware Code, State Administrative Code, <i>BAM</i> , District Accounting Policies, District Budget
Objective 2: Receipt Controls			
	Budgetary process, tax warrants and receipt recording testing.	Design and operation of controls over Local Fund receipts, including budgetary process, tax warrants, and monthly receipt recording.	Delaware Code, State Administrative Code
Objective 3: Real Estate Tax Approval and Calculation			
	Budget, tax warrant, and reserve analysis.	Approval process, tax calculations, and reserve compliance.	Delaware Code, referendum requirements, Delaware Attorney General's opinions
Objective 4: Tuition Tax Calculation and Expenditure			
	Tuition tax disbursement, payroll, budget, and reserve analysis.	Tuition tax calculations, expenditure alignment with special education purposes and reserve compliance.	Delaware Code, District policies

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT METHODOLOGY - CONTINUED

- I. To assess the design and operation of internal controls with respect to Audit Objectives 1 and 4, we conducted the following:
 1. To assess the design of disbursement related internal controls, we analyzed the information gathered in the Planning Phase regarding the following internal control structures:
 - a. Disbursements from all Local Funds including disbursements funded partly with State of Delaware General Fund or Federal appropriations.
 - b. District Purchasing Procedures.
 2. To assess the operation of disbursement internal controls and the District's compliance with the requirements, we selected and tested random samples² of disbursement transactions funded with Local Taxes. We obtained supporting documents from the District to determine if the related products and services were received; transactions were properly documented, authorized, recorded; and that transactions complied with the requirements. We selected the following samples:
 - a. A sample of disbursements funded by non-tuition tax funded appropriations: We identified purchases made using Statewide contracts (Contracts entered into by the Office of Management and Budget's (OMB), Government Support Services Division (GSS)). We selected a subsample of transactions with Statewide contract vendors to verify that District's purchases complied with the terms of the Statewide contracts.
 - b. We selected a sample of disbursements funded by the District's tuition tax funds to determine if the expenditures were consistent with the purpose set forth for use of the tuition tax.

² We selected samples that are sufficient to provide a high level of reliance (95% confidence level) on the operational effectiveness of the internal controls and compliance requirements being tested for the audit period. Sample sizes are based on the degree of planned control reliance along with assessed risk to achieve sufficient evidence to support findings and conclusions.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT METHODOLOGY - CONTINUED

3. To assess operation of procurement internal controls, we summarized the District's purchases into risk-based categories. The following categories³ were identified for sampling during the planning phase:
 - a. Cumulative Purchasing Card expenditures by vendor, with consideration to other non-purchasing card payments to the vendor, to test whether single payments (or multiple payments for similar products or services) may have exceeded the applicable procurement thresholds. Purchasing Card expenditures are higher risk because employees could make purchases without following District procurement requirements. We selected a representative sample of Purchase Card transactions that exceeded the District's procurement threshold, if any.
 - b. Payments to Single-Payment Suppliers (suppliers that were paid only once during the year) to test whether payments may have exceeded the applicable procurement thresholds. Single-Payment Suppliers are subject to increased risk because one-time payments could be used to circumvent the District's purchasing requirements. We selected a representative sample of Single Payment Suppliers that exceed the District's procurement threshold, if any.
 - c. The remaining population of transactions was summarized by vendor. We analyzed cumulative expenditures by vendor, with consideration to multiple purchase orders and multiple direct-claim payments (purchases without purchase orders) for similar products and services. We reviewed the summary of purchases by vendor for vendor activity that exceeded the applicable procurement thresholds. District purchasing operations are decentralized, which increases the risk that similar cumulative vendor procurements could exceed the thresholds in the State's and District's purchasing requirements. We selected a representative sample of vendors that exceed the District's procurement threshold for testing.
4. To assess the design of internal controls over payroll, we analyzed the results of the information gathered in the Planning Phase to identify internal control weaknesses and opportunities for improvement. We specifically analyzed the following internal control processes:
 - a. Employee hiring and approval.
 - b. Salary determination.

³ Analysis of the District's purchasing activity was performed at the District level and included all funding sources. Our analysis included all District funding (local, state, and federal) because the procurement requirements apply regardless of funding source. While analysis was performed at the District-wide level our audit samples were selected from Local Funds, based on the transaction materiality of only Local Funds.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT METHODOLOGY - CONTINUED

- c. Changes to employee salary related to changes in positions related to the achievement of additional education and certifications.
 - d. Payroll preparation and approval.
 - 5. To assess the operation of payroll internal controls and compliance with the requirements, we performed the following:
 - a. Selected a sample of payroll transactions from the population of current year payroll change events⁴ funded by Local Tax appropriations. We tested the selected payroll change events for the following:
 - i. Employees' annual salary increases agreed to published and approved salary tables.
 - ii. Changes to payroll, other than annual salary increases, agreed to supporting documentation and Department of Education approvals, as appropriate.
 - iii. Proper approval was made, as required by District internal controls and the requirements.
 - b. Selected a judgmental⁵ sample of employees, from the population of current year Tuition Local Fund payroll expenditures, to verify that those employees' responsibilities were consistent with the District's special education programs.
 - c. Sampled and tested management's reconciliation, review, and approval of bi-weekly payrolls.
- II. To assess the design of internal controls over the approval of real estate taxes and internal controls over the receipt of Local Funds with respect to Audit Objectives 2, 3, and 4, we performed the following:
 - 1. Reviewed evidence of the budgetary process by review of Board of Education minutes.
 - 2. Obtained the preliminary and final District budgets for the Fiscal Year. This provides that the District undertook a process to analyze its financial needs and set tax rates that are estimated to provide sufficient resources to meet its obligations during the Fiscal Year.

⁴ Payroll change event include promotions, new hires, position changes, salary changes for the achievement of additional education or certification.

⁵ A judgmental sample was selected for this testing. This sampling approach is sufficient because the payroll control testing addressed controls over this requirement. This additional testing is to provide additional evidence that the District complied with the Tuition Tax requirements during the year.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT METHODOLOGY - CONTINUED

3. Obtained the District's executed tax warrant submitted to the County for the Fiscal Year.
 4. Analyzed the District's process for receiving and recording the monthly receipt of Local Funds from the County.
- III. To assess the operation of internal controls over the approval and calculation of real estate taxes and the District's compliance with the requirements with respect to Audit Objectives 2, 3, and 4 we performed the following:
1. Compared taxes levied per official tax warrants to supporting rate calculations, budgets, amounts authorized by referendum, relevant legislation (including tax revenue reserve limits) and District approval.
 2. Obtained and reviewed the District monthly recording of Local Funds receipts. Obtained evidence that District management reviewed and approved the recording of the monthly Local Funds receipts.
 3. Compared the recording of local tax fund receipts by Appropriation to our expectations based on the official tax warrant.
 4. Reviewed the District's budget analysis supporting the Local Tuition Tax rate. We compared the actual tuition tax-funded activities to the tuition tax budget, to identify significant unexplained differences or unexpected increases in the Local Tuition tax reserves.
 5. Analyzed year-end District reserves to determine if the following reserves complied with the following requirements:
 - a. Debt service reserves were within the range set by the Delaware Attorney General's opinions and were sufficient to fund debt service in the first four months of the following fiscal year and no more than 110% of the following fiscal year's debt service payments.
 - b. Overall Local Reserves met the minimum set by the requirements to fund payroll expenditures in the first three and a half months with a surplus equal to one month's payroll expenditures of the following year.
 6. Analyzed tax revenue reserves at the beginning and end of the fiscal year, as applicable.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT RESULTS

Objective 1 - School District internal controls over the expenditure of Local Funds were designed and operated in accordance with the requirements.

Results - Except as detailed in the Schedule of Findings and Recommendations, we found the design of the key internal controls over payroll, non-payroll, and debt expenditures of Local Funds were designed and operated in accordance with the requirements during the period from July 1, 2023 through June 30, 2024.

Non-Payroll Expenditures - To assess the operation of the internal controls over non-payroll expenditures of Local Funds, we selected a random sample of 35 from the population of 8,105 disbursement transactions (excluding transactions from tuition Local Funds tested in Objective 4). Our review of the selected transactions determined that the purchases complied with both State and District requirements and that the transactions were properly approved by the District as evidenced by approvals on invoices and receipts as well as in First State Financials (FSF), the Delaware State accounting system.

School districts are allowed, but not required, to use Statewide contracts procured by the OMB's GSS Division. We selected five transactions from a population of Local Fund disbursements made to vendors with Statewide contracts in conjunction with the procedures performed over procurement. We compared the terms of the invoices and the District's contracts to the Statewide contracts and determined that the transactions were properly approved by the District as evidenced by approval on invoices and receipts as well as in FSF, and that the District's purchases complied with the agreements entered into with the vendors, by the OMB's GSS Division; and therefore, were in compliance with State and District procurement requirements.

Procurement - To assess the District's compliance with both State and District procurement requirements, we analyzed the District's total FY 2024 disbursement population, including purchasing card expenditures by vendor using a risk-based approach, we selected the following samples:

- A judgmentally selected sample of seven from the population of 70 vendors with cumulative expenditures exceeding the \$50,000 procurement threshold per the *BAM* (this is the lowest threshold that requires competitive purchasing).
- A judgmentally selected sample of two vendors with purchasing card purchased with cumulative expenditures exceeding the \$50,000 procurement threshold per the *BAM* (this is the lowest threshold that requires competitive purchasing).
- There were no single-payment supplier purchases made by the District that exceeded \$50,000; therefore, a sample of these transactions was not selected.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT RESULTS - CONTINUED

Objective 1 - Continued

Results - Continued

Procurement - Continued

We examined documentation for each of the transactions selected and found that the purchasing process for goods and services purchased from the three of seven vendors selected during the fiscal year was not in compliance with State and District procurement requirements. Refer to Finding Number 1 in the *Schedule of Findings and Recommendations* for details of the deficiencies identified and the related recommendations.

Payroll Expenditures - To assess the operation of the internal controls over payroll expenditures, made from Local Funds, we selected a random sample of 40 from the population of 2,920 Local Funds pay rate changes, processed during the fiscal year, other than annual salary increases. We examined documentation for each of the transactions selected and found that one of the payroll changes was not documented. Refer to Finding Number 3 in the *Schedule of Findings and Recommendations* for details of the deficiencies identified and the related recommendations.

To test employees' annual pay increases, we selected a random sample of 10 out of 1,461 annual step increases and agreed each employee's salary profile in the State's payroll system, Payroll and Human Resource Statewide Technology (PHRST), to the District's approved FY 2024 salary schedules.

We reviewed evidence of the District's bi-weekly payroll reconciliation and approval process for a random sample of five selected from the population of 26 bi-weekly payroll cycles. We determined that the District did not maintain evidence of a review of bi-weekly payroll expenditures. Refer to Finding Number 3 in the *Schedule of Findings and Recommendations* for details of the deficiencies identified and the related recommendations.

Debt Service Expenditures - We examined the requirement that the District maintain its debt service reserve, within a range of at least four months and no more than 110% of the following fiscal year's debt service payments. We also compared budget to actual debt service expenditures, at the District level, during our analysis of debt service real estate tax rate calculations in Objective 3. Because the payment of debt service is managed and initiated at a statewide level by the State of Delaware Department of Finance, it is outside of the scope of this performance audit, and we did not assess the design or operation of internal controls over debt service expenditures.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT RESULTS - CONTINUED

Objective 2 - School District internal controls over the receipt of Local Funds were designed and operated in accordance with the requirements.

Results - We obtained the New Castle County Reports of Local Property Tax Collections. We selected a sample of three of 12 monthly receipts of Local Funds from New Castle County. We found the District's records included evidence that the receipts were recorded and reviewed by the District.

We reconciled the monthly reports to the District's Local Tax Receipts with a negligible difference. We then recalculated the District's distribution of its receipts among the four categories of local taxes and determined that the District accurately distributed the receipts based on the official warrants and code requirements. We also observed transfers of restricted current expense receipts to relevant appropriations.

Objective 3 - School District real estate taxes were approved and calculated in accordance with the requirements.

Results - To determine if real estate taxes were approved and calculated in accordance with the requirements, we obtained the official tax warrant for FY 2024 and concluded the following:

- The District's current expense rate was supported by a referendum passed in December 2019.
- The District assesses a local match tax for the following: Minor Capital Improvements, Technology, Reading and Math Resource Teachers, Student Success Block Grants, Opportunity Fund, and Substitute Teacher Block Grant. We found the District's aggregate local match tax revenues were consistent with the prior year and were immaterial in relation to total Local Fund revenues.
- We compared debt service tax collections based on the debt service rate to principal and interest schedules for FY 2024 and FY 2025 and determined that the rate was sufficient to cover debt service expenditures in FY 2024 and provide the District with a reserve equal to approximately 93% of its FY 2025 debt payments, as summarized below. District debt service reserves held as of June 30, 2024, were within the range set by the State of Delaware Attorney General.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT RESULTS - CONTINUED

Objective 3 - Continued

Results - Continued

July 1, 2023 Debt Service Reserve Balance	\$ 10,052,188
FY 2024 Debt Service Activity	
Receipts	11,045,986
Expenditures	<u>(10,777,293)</u>
June 30, 2024 Debt Service Reserve Balance	<u>\$ 10,320,881</u>
Budgeted FY 2025 Debt Service	<u>\$ 11,133,184</u>
Reserve to Expected Future Payments Ratio	<u>93%</u>

We accumulated information from the following sources to meet this audit objective - The FY 2024 Debt Service Tax Collections and FY 2024 Debt Service Reserves were obtained from the June 30, 2024 Daily Validity Report (Document Direct Report DGL060), which is a daily report on the status of appropriations. The FY 2024 and FY 2025 Debt Service Principal and Interest were obtained from debt service schedules presented in the FY 2024 Final Budget and the FY 2025 Preliminary Budget, respectively.

- We compared actual tuition tax expenditures and funds transferred out to special programs and other districts to both actual revenues and budgeted expenditures and determined that the rate appeared to be sufficient to meet the District's obligations. Actual expenditures and revenues were obtained from the June 30, 2024 Daily Validity Report and budgeted expenditures from the District's FY 2024 Final Budget.
- We compared the District's local tax funded reserves, held as of June 30, 2024, and 75% of its expected preliminary State equalization funds to its local tax funded payroll obligations for the period from July 1, 2024 through October 15, 2024. We determined that the carryover balances and preliminary State equalization funds were not sufficient to meet the District's local payroll obligations during the period of July 1, 2024 through October 15, 2024 as required by 14 Del. C., §1507. Refer to Finding Number 2 in the *Schedule of Findings and Recommendations* for details of the deficiencies identified and the related recommendations.

The FY 2024 local tax funded reserves were obtained from the June 30, 2024 Daily Validity Report. The District's debt service reserves, held as of June 30, 2024, were excluded for the purposes of the analysis. The preliminary State equalization funds were calculated as 75% of the total State equalization funds appropriated to the District in FY 2024 per the June 30, 2024 Daily Validity Report. Local tax funded payroll obligations for the period from July 1, 2024 through October 15, 2024 were obtained from the District's FY 2025 General Ledger.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDIT RESULTS - CONTINUED

Objective 4 - School District tuition tax funds are calculated and spent in accordance with the requirements.

Results - We examined a random sample of 25 of 1,120 disbursement transactions made from tuition tax funds and determined that the purchases complied with State and District requirements and that the transactions were properly approved by the District, as evidenced by approval on invoices and receipts, as well as in FSF.

We also examined the District's compliance with State and District procurement requirements, in conjunction with procedures performed over nontuition Local Funds. Results are reported in Objective 1.

We examined payroll expenditures made from tuition tax funds in conjunction with the procedures performed over nontuition payroll expenditures. Results are reported in Objective 1.

We also examined employee files for a random sample of 10 of 863 tuition tax funded employees and determined that the employees' responsibilities were consistent with the functions of the District's special education programs and that the employees' salaries and wages were appropriately funded with tuition Local Funds.

We examined tuition tax fund calculations in conjunction with procedures performed over the nontuition Local Funds. Results are reported with Objective 3.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

SCHEDULE OF FINDINGS AND RECOMMENDATIONS

Finding Number 1 - Purchases Did Not Comply with State Purchasing and Procurement Requirements

Condition: We found that the district's purchasing decisions for goods and services from four sampled vendors did not comply with the State's and District's procurement requirements.

- Material purchases of athletic equipment and uniforms totaling \$61,423 were made without obtaining three quotes.
- Material purchases of custodial supplies totaling \$69,507 were made without obtaining three quotes.
- Public works purchases of electrical services of \$379,177 were made without going through the formal bid process.
- Professional therapy services of \$194,587 were purchased without going through the formal professional services proposal process.

Criteria: The District is required to follow the procurement and purchasing requirements of the *BAM* and 29 Del. C. Ch. 69 *State Procurement*.

The following requirements are applicable to material, public works, and professional services purchases:

- Chapter 5, *Procurement*, Section 5.2.6, *Contract Documentation* of the *BAM* requires that "Each Organization must retain in their files all pertinent documents and correspondence relating to the contract bid process, in order that these supporting documents may be available for audit or review by a State official at all times."
- 29 Del. C., §6902(18) defines "Materiel" as materials, equipment, tools, supplies, or any other personal property.
- 29 Del. C., §6902(26) defines "Public Works" as construction, reconstruction, demolition, alteration and repair work and maintenance work.
- 29 Del. C., §6902(21) defines "Professional Services" as services which generally require specialized education, training or knowledge and involve intellectual skills.
- In accordance 29 Del. C., §6960 "Prevailing Wage Requirements", requires that prevailing wage rates be paid for every contract or aggregate of contracts in excess of \$45,000 for repairs.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

SCHEDULE OF FINDINGS AND RECOMMENDATIONS - CONTINUED

Finding Number 1 - Purchases Did Not Comply with State Purchasing and Procurement Requirements - Continued

Criteria - Continued:

- *BAM*, Chapter 5, *Procurement*, Section 5.3.1, *Material and Non-Professional Services Purchase Thresholds*, Section 5.3.2, *Public Works Thresholds*, and Section 5.3.3, *Professional Services Thresholds*, required the following during FY 2024:

	Material and Non-Professional Services	Public Works	Professional Services
Open Market Purchase	Less than \$50,000	Less than \$150,000	Less than \$150,000
3 Written Quotes	\$50,000 - \$99,999.99	\$150,000 - \$249,999	N/A
Formal Bid	\$100,000 and Over	\$250,000 and Over	\$150,000 and Over

Cause: Per discussion with District officials, the District reviews price, availability, and delivery times for previously used vendors but does not maintain contemporaneous documentation of its purchasing decisions and exceptions to the State Code and *BAM* requirements.

Effect: By not following State and District purchasing and procurement requirements to obtain competitive pricing through formal bids or quotations, the District may not have gotten the best prices and terms available. In addition, for the large public works contracts, prevailing wage requirements and performance bonding requirements were not considered, resulting in a violation of the State Code and the assumption of unnecessary risk of non-performance, to the District.

Recommendation: We recommend that the District implement the following:

- Procedures to properly evaluate planned purchases for compliance with formal procurement requirements. Purchases of similar goods or services from the same vendor should be combined and evaluated against the procurement thresholds in total.
- Procedures to document purchasing analyses performed by the District and its purchasing decisions, as a result of the analyses. Documentation retained should also include documents associated with the competitive bid or competitive quotation processes.

View of Responsible District Officials and Planned Corrective Actions: Refer to Management Response section.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

SCHEDULE OF FINDINGS AND RECOMMENDATIONS - CONTINUED

Finding Number 2 - Local Financial Resources at June 30, 2024 Did Not Comply with State Requirements

Condition: The District's local financial resources were not sufficient to satisfy the local portion of payroll expenditures during the period from July 1st through October 15th of the subsequent fiscal year with a surplus equal to one month's local portion of payroll expenditures. Our analysis of the District's year-end financial position identified deficits across multiple appropriations where actual available resources were less than an sufficient amount. The following chart details the deficits by appropriation for the fiscal year ended June 30, 2025:

Appropriation (Total Available & Encumbered)	Required Reserve	Actual Reserves	Reserve Surplus / (Deficit)
Local Current Expense	\$ 21,961,076	\$ 17,184,629 *	\$ (4,776,447)
Tuition	7,009,356	724,389	(6,284,967)
Match Tax - Technology	267,895	-	(267,895)
Match Tax - Reading	185,979	40,589	(145,390)
Match Tax - Math	52,940	58,866	5,926
Match Tax - Extra Time	71,342	461,090	389,748
Opportunity Fund Match	184,452	186,195	1,743
Total	\$ 29,733,040	\$ 18,655,758	\$ (11,077,282)

* Resources available to fund Local Current Expense includes the following:

Division III Equalization Funding (75% of FY 2024 Appropriation of \$16,655,915)	\$ 12,491,936
Unexpended Local Funds (including encumbered funds of \$769,415)	2,192,693
Local Reserves	2,500,000
Total Local Current Expense Reserves	\$ 17,184,629

Criteria: The District is required to hold sufficient local reserves at the end of each fiscal year by 14 Del. C., §1507. The District's reserves must be sufficient to satisfy the local portion of payroll expenditures during the period from July 1st through October 15th of the subsequent fiscal year with a surplus equal to one month's local portion of payroll expenditures (adjusted for expected Division III equalization funding).

Cause: The District's financial reports to the Board of Education did not identify a deficiency in local reserves as of June 30, 2024.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

SCHEDULE OF FINDINGS AND RECOMMENDATIONS - CONTINUED

Finding Number 2 - Local Financial Resources at June 30, 2024 Did Not Comply with State Requirements - Continued

Effect: Insufficient local reserves increase the risk that the District's operations may be disrupted due to its inability to meet its local payroll obligations during the period from July 1st through November 15th without borrowing funds or delaying payments. The District's insufficient financial resources resulted in a 10% increase in the District's tax rate effective July 1, 2025.

Recommendation: We recommend the District strengthen its internal controls over financial reporting to the Board. Additionally, we recommend the District implement the following:

- A secondary review process for all financial reports and reserve calculations presented to the Board to ensure accuracy.
- A plan to increase local reserves to the required levels.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

SCHEDULE OF FINDINGS AND RECOMMENDATIONS - CONTINUED

Finding Number 3 - Lack of Proper Review and Approval of Payroll Changes to Employee Payroll

Condition: We found the following exceptions in a sample of 40 payroll changes selected for testing:

- Fifteen instances of employees' pay change reviews not being documented by the Director of Finance.
- The District was unable to provide documentation supporting one pay change.
- The District did not retain documentation that bi-weekly payroll had been reviewed by the Director of Finance.

Criteria: District's Payroll Policy and Procedures, require the Director of Finance to review and approve salaries and verify data entry.

Cause: The conditions above were caused by the following:

- Certain changes to salaries and wages were not reviewed and approved by the Director of Finance.
- Evidence showing that bi-weekly pay had been reviewed was not properly retained by the District.

Effect: By not properly approving and documenting changes to employee payroll and bi-weekly payroll, the District increases its risk that erroneous or fraudulent information may be entered into PHRST.

Recommendation: We recommend the District implement the following:

- The Director of Finance memorializes their review of all pay changes in the employees' files.
- The District should review and update its documentation retention policies to ensure all key records are stored in a centralized and accessible location. Proper document retention will help maintain continuity during changes in management and ensure that critical documents can be retrieved in a timely manner.

View of Responsible District Officials and Planned Corrective Actions: Refer to the Corrective Action Plan section.

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

CONCLUSION

Based on the work performed in connection with this performance audit, we concluded the following:

Objective 1 - Except as described in Finding Numbers 1 and 3, we found the School District's internal controls over the expenditure of Local Funds were designed and operated in accordance with the requirements.

Objective 2 - The School District's internal controls over the receipt of Local Funds were designed and operated in accordance with the requirements.

Objective 3 - Except as described in Finding Number 2, we found the School District's real estate taxes were approved and calculated in accordance with the requirements.

Objective 4 - Except as described in Finding Numbers 1, 2, and 3, the School's District's tuition tax funds were calculated and spent in accordance with the requirements.



Appoquinimink School District

THE WORLD IS OUR CAMPUS

Tony J. Marchio Administration Building | apposchooldistrict.com
313 South Fifth Street, PO Box 4010, Odessa, DE 19730-4010 | 302.376.4128

April 28, 2026

Belfint Lyons & Shuman, P.A.
1011 Centre Road
Suite 31
Wilmington, DE 19805

Re: ASD Response to Audit Finding for Fiscal Year 2024

This letter provides Belfint Lyons & Shuman, P.A. with a response to the audit finding noted in the Fiscal Year 2023 Audit.

Finding #1: Purchases Did Not Comply with State Purchasing and Procurement Requirements.

Appoquinimink School District (ASD) Response:

The District acknowledges the finding and is undertaking a comprehensive review of applicable State of Delaware purchasing and procurement requirements. ASD is in the process of evaluating and strengthening its internal controls, procedures, and oversight mechanisms to ensure full compliance with state regulations.

This review includes, but is not limited to, an analysis of vendor utilization, purchasing history, approval processes, and documentation practices. The District is implementing corrective actions designed to enhance compliance, including updated procedures, increased administrative oversight, and staff guidance regarding procurement requirements.

ASD recognizes the importance of strict adherence to state procurement laws and is committed to implementing all necessary corrective measures in a timely and effective manner.

Matt Burrows, Ed.D.
Superintendent

BOARD

Norman Abrams
Nichelle DeWitt
Richard Forsten, Esq.
Dr. Tashiba Graham
Tim Higgins

ADMINISTRATION

Tony J. Marchio Building
Marion E. Proffitt Training Center

PRESCHOOL

Age 3-4

Appoquinimink Preschool Center
Brick Mill ECC

ELEMENTARY

Early Childhood Centers /
Kindergarten

Brick Mill ECC
Cedar Lane ECC
Spring Meadow ECC
Townsend ECC

Grade 1-5 Schools

Brick Mill Elementary
Bunker Hill Elementary
Cedar Lane Elementary
Crystal Run Elementary
Lorewood Grove Elementary
Old State Elementary
Olive B. Loss Elementary
Silver Lake Elementary
Townsend Elementary

SECONDARY

Grade 6-8 Schools

Alfred G. Waters Middle
Cantwell's Bridge Middle
Everett Meredith Middle
Louis L. Redding Middle

Grade 9-12 Schools

Appoquinimink High
Middletown High
Odessa High

ADULT EDUCATION CENTER

ESL/ABE
GED/James Groves High School



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Finding #2: Local Financial Resources at June 30, 2024 Did Not Comply with State Requirements.

Appoquinimink School District (ASD) Response:

The District respectfully disagrees with this finding. ASD maintains that it had adequate local financial resources and met all required financial obligations. Specifically, the District successfully satisfied all local payroll obligations in Fiscal Year 2025.

ASD will continue to engage with the State of Delaware and the auditors to review the basis of this determination, clarify applicable requirements, and ensure alignment in the interpretation and application of relevant financial compliance standards.

Finding #3: Lack of Proper Review and Approval of Payroll Changes to Employee Payroll.

Appoquinimink School District (ASD) Response:

The District has implemented enhanced internal controls to address this finding. Effective immediately, payroll reports are subject to formal review and approval on a bi-weekly basis by the Director of Finance. This review is documented through both electronic and manual approval processes.

These procedures establish an additional layer of oversight to ensure the accuracy, authorization, and proper documentation of all payroll changes. ASD will continue to monitor and evaluate these controls to ensure sustained compliance and effectiveness.

Signature – Alleesa Stewart, MBA, Director of Finance – 04/28/2026

Matt Burrows, Ed.D.
Superintendent

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GED/James Groves High School

CC: Dr. Matthew Burrows, Superintendent

APPOQUINIMINK SCHOOL DISTRICT
LOCAL FUNDS PERFORMANCE AUDIT
JUNE 30, 2024

AUDITOR'S RESPONSE TO DISTRICT RESPONSE AND CORRECTIVE ACTION PLAN

Finding 2024-002 - Local Financial Resources at June 30, 2024 Did Not Comply with State Requirements

We reviewed the District's response asserting respectful disagreement with Finding 2024-002. The sufficiency of year-end local financial resources, as required by the State of Delaware Code, is not determined only by the District's ability to pay local payroll obligations in the subsequent fiscal year but with all of the requirements of 14 Del. C. §1507. The District's response does not provide adequate additional information necessary for us to change the condition identified in Finding 2024-002.