SMOKY HILL CENTRAL KANSAS EDUCATION SERVICE CENTER INTERLOCAL SCHOOL DISTRICT NO. 629 SALINA, KANSAS

FINANCIAL STATEMENT JUNE 30, 2022



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INDEPENDENT AUDITORS' REPORT

Board of Directors Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629 Salina, Kansas

We have audited the accompanying fund summary statement of regulatory basis receipts, expenditures, and unencumbered cash balances of **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas**, as of and for the year ended **June 30, 2022**, and the related notes to the financial statement.

Adverse and Unmodified Opinions

Basis for Adverse Opinion on Accounting Principles Generally Accepted in the United States of America

In our opinion, because of the significance of the matter discussed in the Basis for Adverse and Unmodified Opinions section of our report, the accompanying financial statement referred to above does not present fairly, in conformity with accounting principles generally accepted in the United States of America, the financial position of **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas**, or changes in financial position and cash flows thereof for the year then ended.

Unmodified Opinion on Regulatory Basis of Accounting

In our opinion, the accompanying financial statement referred to above presents fairly, in all material respects, the aggregate cash and unencumbered cash balance of **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas**, as of **June 30, 2022**, and the aggregate receipts and expenditures for the year then ended in accordance with the financial reporting provisions of the *Kansas Municipal Audit and Accounting Guide* described in Note 1.

Basis for Adverse and Unmodified Opinions

We conducted our audit 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 the *Kansas Municipal Audit and Accounting Guide*. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Financial Statement section of the report. We are required to be independent of **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas** and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our adverse and unmodified audit opinions.

Matter Giving Rise to Adverse Opinion on Accounting Principles Generally Accepted in the United State of America

As discussed in Note 1 of the financial statement, the financial statement is prepared by **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas**, on the basis of the financial reporting provisions of the *Kansas Municipal Audit and Accounting Guide*, which is a basis of accounting other than accounting principles generally accepted in the United States of America. The effects on the financial statement of the variances between the regulatory basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material.

Responsibilities of Management for the Financial Statement

Management is responsible for the preparation and fair presentation of the financial statement in accordance with the *Kansas Municipal Audit and Accounting Guide* as described in Note 1; this includes determining that the regulatory basis of accounting is an acceptable basis for the preparation of the financial statement in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the financial statement that is free from material misstatement, whether due to fraud or error.

In preparing the financial statement, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas'** ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditors' Responsibilities for the Audit of the Financial Statement

Our objectives are to obtain reasonable assurance about whether the financial statement as a whole is free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with auditing standards generally accepted in the United States of America and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statement.

In performing an audit in accordance with auditing standards generally accepted in the United States of America and *Government Auditing Standards*, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statement, whether
 due to fraud or error, and design and perform audit procedures responsive to those risks.
 Such procedures include examining, on a test basis, evidence regarding the amounts and
 disclosures in the financial statement.
- Obtain an understanding of internal control relevant to the audit in order to design audit
 procedures that are appropriate in the circumstances, but not for the purpose of expressing
 an opinion on the effectiveness of the Smoky Hill Central Kansas Education Service
 Center Interlocal School District No. 629, Salina, Kansas' internal control. Accordingly,
 no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statement.
- Conclude whether, in our judgment, there are conditions or events, considered in the
 aggregate, that raise substantial doubt the Smoky Hill Central Kansas Education Service
 Center Interlocal School District No. 629, Salina, Kansas' ability to continue as a going
 concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Supplementary Information

Our audit was conducted for the purpose of forming an opinion on the fund summary statement of regulatory basis receipts, expenditures, and unencumbered cash balances (basic financial statement) as a whole. The summary of regulatory basis expenditures-actual and budget, individual fund schedules of regulatory basis receipts and expenditures-actual and budget, individual fund schedules of regulatory basis receipts and expenditures-actual, agency funds schedules of regulatory basis cash receipts and disbursements, district activity funds schedules of regulatory basis cash receipts, expenditures and unencumbered cash (Regulatory-Required Supplementary Information as listed in the table of contents) are presented for purposes of additional analysis and are not a required part of the basic financial statement, however are required to be presented under the provisions of the Kansas Municipal Audit and Accounting Guide. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by Title 2 U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, and is not a required part of the basic financial statement. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statement. The information has been subjected to the auditing procedures applied in the audit of the basic financial statement and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statement or to the basic financial statement itself, and other additional procedures in accordance with

auditing standards generally accepted in the United States of America. In our opinion, the accompanying supplementary information is fairly stated, in all material respects, in relation to the basic financial statement as a whole, on the basis of accounting described in Note 1.

We also previously audited, in accordance with auditing standards generally accepted in the United States of America, the basic financial statement of the **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas**, as of and for the year ended June 30, 2021, and have issued our report thereon dated November 2, 2021, which contained an unmodified opinion on the basic financial statement.

The 2021 basic financial statement and our accompanying report are not presented herein, but are available in electronic form from the web site of the Kansas Department of Administration at the following link: https://admin.ks.gov/offices/oar/municipal-services. The 2021 actual column (2021 comparative information) presented in the individual fund schedules of regulatory basis receipts and expenditures-actual and budget for the year ended June 30, 2021 (as listed in the table of contents) is presented for purposes of additional analysis and is not a required part of the basic financial statement. Such 2021 comparative information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the 2021 basic financial statement. The 2021 comparative information was subjected to the auditing procedures applied in the audit of the 2021 basic financial statement and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the 2021 basic financial statement or to the 2021 basic financial statement itself, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the 2021 comparative information is fairly stated in all material respects in relation to the basic financial statement as a whole for the year ended June 30, 2021, on the basis of accounting described in Note 1.

Other Reporting Required by Government Auditing Standards
In accordance with Government Auditing Standards, we have also issued our report dated January
12, 2023, on our consideration of Smoky Hill Central Kansas Education Service Center
Interlocal School District No. 629, Salina, Kansas' 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 solely to describe the scope of our
testing of internal control over financial reporting and compliance and the results of that testing,
and not to provide an opinion on the effectiveness of Smoky Hill Central Kansas Education
Service Center Interlocal School District No. 629, Salina, Kansas' internal control over financial
reporting or on compliance. That report is an integral part of an audit performed in accordance with
Government Auditing Standards in considering Smoky Hill Central Kansas Education Service
Center Interlocal School District No. 629, Salina, Kansas' internal control over financial
reporting and compliance.

BFR CPA, LLC January 12, 2023

SMOKY HILL CENTRAL KANSAS EDUCATION SERVICE CENTER INTERLOCAL SCHOOL DISTRICT NO. 629 SUMMARY OF CASH RECEIPTS, EXPENDITURES, AND UNENCUMBERED CASH REGULATORY BASIS FOR THE YEAR ENDED JUNE 30, 2022

												Add		
	В	eginning		Prior Year						Ending	Encu	umbrances		
	Une	ncumbered		Canceled					Une	ncumbered	and	Accounts	Er	nding Cash
Fund	Fund Cast		Encumbrances		Cash Receipts		E	Expenditures		sh Balance	Payable		Balance	
General Fund	\$	248,854	\$	0	\$	4,296,128	\$	3,999,293	\$	545,689	\$	45,276	\$	590,965
Special Purpose Funds														
Capital Outlay		448,118		0		0		4,600		443,518		0		443,518
Career and Postsecondary Education		(26,037)		0		190,496		190,496		(26,037)		12,504		(13,533)
Federal Funds		360,355		0		526,731		574,847		312,239		0		312,239
Domestic Violence Assoc. Grant		(3,388)		0		0		0		(3,388)		0		(3,388)
KJCC/LHGS Dept. of Corrections		13,378		0		2,320,585		2,320,585		13,378		0		13,378
LGHS Miscellaneous		(7,425)		0		5,972		4,819		(6,272)		0		(6,272)
KS Professional Learning Team		88,354		0		. 0		0		88,354		0		88,354
Senate Bill 155 Program		18,018		0		0		0		18,018		0		18,018
Fast ForWord		(1,300))	0		10,432		11,732		(2,600)		0		(2,600)
TLC @ Smoky Hill Ed Service Center		15,694		0		172,388		176,591		11,491		0		11,491
St. Francis Academy-Juvenile		1,284		0		456,392		441,179		16,497		0		16,497
St. Francis Academy-Title I		14,413		0		139,655		138,950		15,118		0		15,118
Tipton Community School		19,583		0		513,896		529,934		3,545		0		3,545
Rosetta Stone		(1,265)		0		33,465		34,500		(2,300)		0		(2,300)
	\$	1,188,636	\$	0	\$	8,666,140	\$	8,427,526	\$	1,427,250	\$	57,780	\$	1,485,030
					Com	position of	Cas	sh:		ecking Acco			\$	(173,154)
									Mo	ney Market A	ccou	nt	-	1,658,184
													\$	1,485,030

The notes to the financial statement are an integral part of this statement.

Note 1 - Summary of Significant Accounting Policies:

Financial Reporting Entity

Smoky Hill Central Kansas Education Service Center, Interlocal School District No. 629 (the primary government), is an interlocal unified school district established as an interlocal to provide special education services to participating unified school districts. The Interlocal cannot levy taxes but receives its revenue from federal and state aid and contracted participating unified school districts for special education services.

KMAAG Regulatory Basis of Presentation Fund Definitions:

General Fund-the chief operating fund. Used to account for all resources except those required to be accounted for in another fund.

Special Purpose Funds-used to account for the proceeds of specific tax levies and other specific regulatory receipt sources (other than Capital Project and tax levies for long-term debt) that are intended for specified purposes.

Regulatory Basis of Accounting and Departure from Accounting Principles Generally accepted in the United States of America

The KMAAG regulatory basis of accounting involves the recognition of cash, cash equivalents, marketable investments, and certain accounts payable and encumbrance obligations to arrive at a net unencumbered cash and investments balance on a regulatory basis for each fund, and the reporting of changes in unencumbered cash and investments of a fund resulting from the difference in regulatory basis receipts and regulatory basis expenditures for the fiscal year. All recognized assets and liabilities are measured and reported at cost, unless they have been permanently impaired and have no future cash value or represent no future obligation against cash. The KMAAG regulatory basis does not recognize capital assets, long-term debt, accrued receivables and payables, or any other assets, liabilities or deferred inflows or outflows, other than those mentioned above.

The Interlocal has approved a resolution that is in compliance with K.S.A. 75-1120a(c), waiving the requirement for application of accounting principles generally accepted in the United States of America and allowing the Interlocal to use the regulatory basis of accounting.

Budget and Assessment Cycle

The Interlocal prepares a budget under the Kansas cash basis and budget laws to determine assessments to member districts and other financial planning purposes.

The statutes permit transferring budgeted amounts between line items within an individual fund. However, such statutes prohibit expenditures in excess of the total amount of the adopted budget of expenditures of individual funds. Budget comparison schedules are presented for each fund showing actual receipts and expenditures compared to legally budgeted receipts and expenditures.

All operating budgets are prepared using the regulatory basis of accounting, in which regulatory receipts are recognized when cash is received and expenditures include disbursements, accounts payable, and encumbrances, with disbursements being adjusted for the prior year's accounts payable and encumbrances. Encumbrances are commitments by the Interlocal for future payments and are supported by a document evidencing the commitment, such as a purchase order or contract. Any unused budgeted expenditure authority lapses at year end.

An operating budget is not required for capital projects funds, trust funds, and the following special purpose funds:

Career & Postsecondary Education Fund Domestic Violence Assoc. Grant Fund LGHS Miscellaneous Fund Senate Bill 155 Program Fund TLC @ Smoky Hill Ed Serv Center Fund St. Francis Academy-Title I Fund Rosetta Stone Fund Federal Funds KJCC/LHGS Dept. of Corrections Fund KS Professional Learning Team Fund Fast ForWord Fund St. Francis Academy-Juvenile Fund Tipton Community School Fund

Spending in funds which are not subject to the annual operating budget requirement is controlled by federal regulations, other statutes, or by the use of internal spending limits established by the governing body.

Note 2 - Postemployment Benefits:

As provided by K.S.A. 12-5040, the Interlocal allows retirees to participate in the group health insurance plan. While each retiree pays the full amount of the applicable premium, conceptually, the Interlocal is subsidizing the retirees because each participant is charged a level of premium regardless of age. However, the cost of this subsidy has not been quantified in the financial statement.

Under the Consolidated Omnibus Budget Reconciliation Act (COBRA), the Interlocal makes health care benefits available to eligible former employees and eligible dependents. Certain requirements are outlined by the federal government for this coverage. The premium is paid in full by the insured.

Note 3 - Reimbursed Expenditures:

The Interlocal records reimbursable expenditures in the fund that makes the disbursement and records reimbursements as a receipt to the fund that receives the reimbursement. For purposes of budgetary comparisons, the expenditures are properly offset by the reimbursements under the KMAAG regulatory basis of accounting.

Note 4 - Defined Benefit Pension Plan:

Plan description

The Interlocal participates in the Kansas Public Employees Retirement System (KPERS), a cost-sharing, multiple-employer defined benefit pension plan as provided by K.S.A. 74-4901, et seq. Kansas law establishes and amends benefit provisions. KPERS issues a publicly available financial report that includes financial statements and required supplementary information. KPERS' financial statements are included in its Comprehensive Annual Financial Report which can be found on the KPERS website at www.kpers.org or by writing to KPERS (611 South Kansas, Suite 100, Topeka, KS 66603) or by calling 1-888-275-5737.

Contributions

K.S.A. 74-4919 and K.S.A. 74-49,210 establish the KPERS member-employee contribution rates. KPERS has multiple benefit structures and contribution rates depending on whether the employee is a KPERS 1, KPERS 2 or KPERS 3 member. KPERS 1 members are active and contributing members hired before July 1, 2009. KPERS 2 members were first employed in a covered position on or after July 1, 2009 and KPERS 3 members were first employed in a covered position on or after January 1, 2015. Effective January 1, 2015, Kansas law established the KPERS member-employee contribution rate of 6% of covered salary for KPERS 1, KPERS 2 and KPERS 3 members. Member contributions are withheld by their employer and paid to KPERS according to the provisions of Section 414(h) of the Internal Revenue Code.

State law provides that the employer contribution rates for KPERS 1, KPERS 2 and KPERS 3 be determined based on the results of each annual actuarial valuation. Kansas law sets a limitation on annual increases in the employer contribution rates. The actuarially determined employer contribution rate and the statutory contribution rate (not including the 1% contribution rate for the Death and Disability Program) was 15.59% and 14.23%, respectively, for the fiscal year ended June 30, 2021. The actuarially determined employer contribution rate and the statutory contribution rate was 14.83% and 13.33% for the fiscal year ended June 30, 2022.

Senate Substitute for House Bill 2052 authorized the delay of \$64.1 million in fiscal year 2017 contributions. These contributions were set up as a long-term receivable. Payment is scheduled to be made in a series of twenty annual payments of \$6.4 million dollars per year beginning in fiscal year 2018. Senate Substitute for House Bill 2002 authorized the delay of \$194.0 million in fiscal year 2019 contributions. Payment is scheduled to be made in a series of twenty annual payments of \$19.4 million starting in fiscal year 2020.

House Substitute for Senate Bill 109 from the 2018 Legislative session provided for additional funding for the KPERS School Group. A payment of \$56 million was paid in fiscal year 2018. This bill also authorized a payment of \$82 million in fiscal year 2019. The 2019 legislative session authorized an additional fiscal year payment for the KPERS School Group. 2019 Senate Bill 9 authorized a payment of \$115 million for the KPERS School Group. House Substitute for Senate Bill 25 from the 2019 Legislative session authorized additional funding for the KPERS School Group in fiscal year 2020 of \$51 million.

The State of Kansas is required to contribute the statutory required employer's share. Since the Interlocal is considered a special funding situation, the Interlocal was not required to contribute amounts equal to the statutory contribution rate for the year ended June 30, 2022.

Net Pension Liability

The Interlocal is considered a special funding situation. The state contributes 100% of the contractually required employer contributions. However, they do make contributions directly to KPERS for KPERS retirees filling KPERS covered positions per K.S.A. 74-4937, "working after retirement" employees. The resulting proportional share of the "working after retirement" contributions and resulting net pension liability are attributable to the employer.

At June 30, 2022, the Interlocal's proportionate share of the collective net pension liability reported by KPERS was \$221,248. The net pension liability was measured as of June 30, 2021, and the total pension liability used to calculate the net pension liability was determined by an actuarial valuation as of December 31, 2020, which was rolled forward to June 30, 2021. The Interlocal's proportion of the net pension liability was based on the ratio of the Interlocal's contributions to KPERS, relative to the total employer and non-employer contributions of the State/School subgroup within KPERS for the fiscal year ended June 30, 2021. Since the KMAAG regulatory basis of accounting does not recognize long-term debt, this liability is not reported in this financial statement.

The complete actuarial valuation report including all actuarial assumptions and methods, and the report on the allocation of the KPERS collective net pension liability to all participating employers are publicly available on the website at www.kpers.org or can be obtained as described above.

Note 5 - Subsequent Events:

The Interlocal has evaluated subsequent events through January 12, 2023, the date which the financial statement was available to be issued.

Note 6 - Compensated Absences:

The Interlocal's policy is to recognize the costs of compensated absences when actually paid. The Interlocal grants annual paid vacations to its full-time, regular employees. Annual vacation is granted based on length of service from ten to fifteen days.

Vacation days cannot be accumulated and payments are not made in lieu of vacation except for unused days at the time of termination of employment.

Note 7 - Deposits:

K.S.A. 9-1401 establishes the depositories which may be used by the Interlocal. The statute requires banks eligible to hold the Interlocal's funds have a main or branch bank in the county in which the Interlocal is located or in an adjoining county if such institution has been designated as an official depository, and the banks provide an acceptable rate of return on funds. In addition, K.S.A. 9-1402 requires the banks to pledge securities for deposits in excess of FDIC coverage. The Interlocal has no other policies that would further limit interest rate risk.

K.S.A. 12-1675 limits the Interlocal's investment of idle funds to time deposits, open accounts, and certificates of deposit with allowable financial institutions; U.S. government securities; temporary notes; no-fund warrants; repurchase agreements; and the Kansas Municipal Investment Pool. The Interlocal has no investment policy that would further limit its investment choices.

Concentration of credit risk. State statutes place no limit on the amount the Interlocal may invest in any one issuer as long as the investments are adequately secured under K.S.A. 9-1402 and 9-1405.

Custodial credit risk – deposits. Custodial credit risk is the risk that in the event of a bank failure, the Interlocal's deposits may be returned to it. State statutes require the Interlocal's deposits in financial institutions to be entirely covered by federal depository insurance or by collateral held under a joint custody receipt issued by a bank within the State of Kansas, the Federal Reserve Bank of Kansas City, or the Federal Home Loan Bank of Topeka, except during designated "peak periods" when required coverage is 50%. All deposits were legally secured at June 30, 2022.

At June 30, 2022, the Interlocal's carrying amount of deposits was \$1,485,030 and the bank balance was \$1,752,261. The bank balance was held by one bank resulting in a concentration of credit risk. Of the bank balance, \$344,077 was covered by federal depository insurance and the remaining \$1,408,184 was collateralized with securities held by the pledging financial institutions' agents in the Interlocal's name.

Note 8 - Contingencies:

Grant Programs

The Interlocal participates in various federal and state grant programs. These grant programs are often subject to additional audits by agents of the granting agency, the purpose of which is to ensure compliance with the specific conditions of the grant. Any liability for reimbursement which may arise as a result of these audits cannot be reasonably determined at this time, although it is believed the amount, if any, would not be material.

Risk Management

The Interlocal is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; and natural disasters. The Interlocal carries commercial insurance for all risks of loss. Settled claims resulting from these risks have not exceeded commercial insurance coverage in any of the past three fiscal years.

REGULATORY REQUIRED SUPPLEMENTARY INFORMATION

SMOKY HILL CENTRAL KANSAS EDUCATION SERVICE CENTER INTERLOCAL SCHOOL DISTRICT NO. 629 SUMMARY OF EXPENDITURES - ACTUAL AND BUDGET REGULATORY BASIS FOR THE YEAR ENDED JUNE 30, 2022

			Adju	stment for			Ε	xpenditures		
		Certified	Qı	ualifying	Т	otal Budget	Ch	nargeable to	V	/ariance -
Fund		Budget	Budg	et Credits	for	Comparison	С	urrent Year	Ov	er (Under)
General Fund	\$	4,722,889	\$	0	\$	4,722,889	\$	3,999,293	\$	(723,596)
Special Purpose Funds										
Capital Outlay		0		0		0		4,600		4,600
Career and Postsecondary Education	X	XXXXXXXXX	XXX	XXXXXXX	X	XXXXXXXX		190,496	XXX	XXXXXXX
Federal Funds	X	XXXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		574,847	XX	XXXXXXXX
Domestic Violence Assoc. Grant	X	XXXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		0	XX	XXXXXXXX
KJCC/LHGS Dept. of Corrections	X	XXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		2,320,585	XX	XXXXXXXX
LGHS Miscellaneous	X	XXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		4,819	XX	XXXXXXXX
KS Professional Learning Team	X	XXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		0	XX	XXXXXXXX
Senate Bill 155 Program	X	XXXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		0	XX	XXXXXXXX
Fast ForWord	X	XXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		11,732	XX	XXXXXXXX
TLC @ Smoky Hill Ed Service Center	X	XXXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		176,591	XX	XXXXXXXX
St. Francis Academy-Juvenile	X	XXXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		441,179	XX	XXXXXXXX
St. Francis Academy-Title I	X	XXXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		138,950	XX	XXXXXXXX
Tipton Community School	X	XXXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		529,934	XX	XXXXXXXX
Rosetta Stone	X	XXXXXXXXX	XXX	XXXXXXX	X	XXXXXXXXX		34,500	XX	XXXXXXXX
	\$	4,722,889	\$	0	\$	4,722,889	\$	8,427,526	\$	(718,996)

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

General Fund		Curre		
	Prior Year			Variance -
	Actual	Actual	Budget	Over (Under)
Cash Receipts				
Local Sources	\$ 1,927,313	\$ 4,296,128	\$ 4,771,194	<u>\$ (475,066)</u>
	1,927,313	4,296,128	\$ 4,771,194	<u>\$ (475,066)</u>
Expenditures				
Instruction	1,267,178	1,337,542	\$ 2,688,013	\$ (1,350,471)
General Administration	721,885	2,661,751	2,034,876	626,875
	1,989,063	3,999,293	\$ 4,722,889	\$ (723,596)
Receipts Over (Under) Expenditures	(61,750)	296,835		
Unencumbered Cash, Beginning	310,604	248,854		
Prior Year Canceled Encumbrances	0	0		
Unencumbered Cash, Ending	\$ 248,854	\$ 545,689		

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

Capital Outlay Fund			_	Currer	t Y	ear		
	F	Prior Year					Va	ariance -
		Actual		Actual		Budget	Ove	r (Under)
Cash Receipts								
Local Sources	\$	0	\$	0	\$	0	\$	0
		0	_	0	\$	0	<u>\$</u>	0
Expenditures								
General Administration	_	127,325	_	4,600	\$	0	\$	4,600
	1	127,325	_	4,600	<u>\$</u>		<u>\$</u>	4,600
Receipts Over (Under) Expenditures		(127,325)		(4,600)				
Unencumbered Cash, Beginning		575,443		448,118				
Prior Year Canceled Encumbrances	_	0	_	0				
Unencumbered Cash, Ending	<u>\$</u>	448,118	\$	443,518				

FOR THE YEAR ENDED JUNE 30, 2022 (With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

Career and Postsecondary

Education Fund		
	Prior Year	Current Year
	Actual	Actual
Cash Receipts		
Federal Sources	\$ 204,391	\$ 190,496
	204,391	190,496
Expenditures		
General Administration	204,394	190,496
	204,394	190,496
Receipts Over (Under) Expenditures	(3)	0
Unencumbered Cash, Beginning	(26,034)	(26,037)
Prior Year Canceled Encumbrances	0	0
Unencumbered Cash, Ending	\$ (26,037)	\$ (26,037)

FOR THE YEAR ENDED JUNE 30, 2022 (With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

Federal Funds

	Prior Year Actual		Cu	ırrent Year Actual
Cash Receipts		, lotolai		7 totaai
Federal Sources	\$	564,633	\$	526,731
		564,633		526,731
Expenditures				
Instruction		237,475		216,049
General Administration		131,451		358,798
	_	368,926		574,847
Receipts Over (Under) Expenditures		195,707		(48,116)
Unencumbered Cash, Beginning		164,648		360,355
Prior Year Canceled Encumbrances		0	-	0
Unencumbered Cash, Ending	\$	360,355	\$	312,239

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

Domestic Violence Assoc. Grant Fund

	Prior Year Actual	Current Year Actual
Cash Receipts Local Sources	\$ 0	\$ <u>0</u>
Expenditures General Administration	0	0
Receipts Over (Under) Expenditures	0	0
Unencumbered Cash, Beginning	(3,388)	(3,388)
Prior Year Canceled Encumbrances	0	0
Unencumbered Cash, Ending	\$ (3,388)	\$ (3,388)

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

KJCC/LHGS Dept. of Corrections Fund

	Prior Year Actual	Current Year Actual
Cash Receipts		
Local Sources	\$ 2,362,239	\$ 2,320,585
	2,362,239	2,320,585
Expenditures		
Instruction	1,547,671	1,517,599
General Administration	769,537	802,986
	2,317,208	2,320,585
Receipts Over (Under) Expenditures	45,031	0
Unencumbered Cash, Beginning	(31,653)	13,378
Prior Year Canceled Encumbrances	0	0
Unencumbered Cash, Ending	\$ 13,378	\$ 13,378

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

LGHS Miscellaneous Fund

W 	Prior Year	Current Year
	Actual	Actual
Cash Receipts		
Local Sources	\$ 6,373	\$ 5,972
	6,373	5,972
Expenditures		
General Administration	5,742	4,819
	5,742	4,819
Receipts Over (Under) Expenditures	631	1,153
Unencumbered Cash, Beginning	(8,056) (7,425)
Prior Year Canceled Encumbrances	0	0
Unencumbered Cash, Ending	\$ (7,425) \$ (6,272)

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

KS Professional Learning Team Fund

The state of the s	Prior Year Actual	Current Year Actual
Cash Receipts Federal Sources	\$ 0	\$ O O
Expenditures General Administration	0	0
Receipts Over (Under) Expenditures	0	0
Unencumbered Cash, Beginning	88,354	88,354
Prior Year Canceled Encumbrances	0	0
Unencumbered Cash, Ending	\$ 88,354	\$ 88,354

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

Senate Bill 155 Program Fund

	Prior Year Actual	(Current Year Actual		
Cash Receipts Local Sources	·	0 9	0		
Expenditures General Administration	-	<u> </u>	0		
Receipts Over (Under) Expenditures		C	0		
Unencumbered Cash, Beginning	18,01	3	18,018		
Prior Year Canceled Encumbrances		2 _	0		
Unencumbered Cash, Ending	\$ 18,01	3 \$	18,018		

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

Fast ForWord Fund

	Prior Year Actual		Current Year Actual		
Cash Receipts Local Sources	\$	559 559	\$	10,432 10,432	
Expenditures General Administration	_	809 809	0	11,732 11,732	
Receipts Over (Under) Expenditures		(250)		(1,300)	
Unencumbered Cash, Beginning		(1,050)		(1,300)	
Prior Year Canceled Encumbrances		0	·	0	
Unencumbered Cash, Ending	\$	(1,300)	\$	(2,600)	

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

TLC @ Smoky Hill Ed Service Center Fund

TEO (CONTON) THE EAR CONTOC CONTON TANK	Prior Year	Current Veer		
Pric		Current Year		
	Actual	Actual		
Cash Receipts				
Local Sources	\$ 191,050	\$ 172,388		
	191,050	172,388		
Expenditures				
Instruction	101,341	110,254		
General Administration	112,482	66,337		
	213,823	176,591		
Receipts Over (Under) Expenditures	(22,773)	(4,203)		
Unencumbered Cash, Beginning	38,467	15,694		
Prior Year Canceled Encumbrances	0	0		
Unencumbered Cash, Ending	\$ 15,694	\$ 11,491		

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

St. Francis Academy-Juvenile Fund

	Prior Year Actual	Current Year Actual		
Cash Receipts				
Local Sources	\$ 411,165	\$ 456,392		
	411,165	456,392		
Expenditures				
Instruction	320,104	305,974		
General Administration	82,305	135,205		
	402,409	441,179		
Receipts Over (Under) Expenditures	8,756	15,213		
Unencumbered Cash, Beginning	(7,472)	1,284		
Prior Year Canceled Encumbrances	0	0		
Unencumbered Cash, Ending	\$ 1,284	\$ 16,497		

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

St. Francis Academy-Title I Fund

Prior Year Actual		Current Year Actual		
Cash Receipts Local Sources	\$ 96,435 96,435	\$ 139,655 139,655		
Expenditures Instruction General Administration	120,040 9,283 129,323	103,768 35,182 138,950		
Receipts Over (Under) Expenditures	(32,888)	705		
Unencumbered Cash, Beginning	47,301	14,413		
Prior Year Canceled Encumbrances	0	0		
Unencumbered Cash, Ending	\$ 14,413	\$ 15,118		

FOR THE YEAR ENDED JUNE 30, 2022

(With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

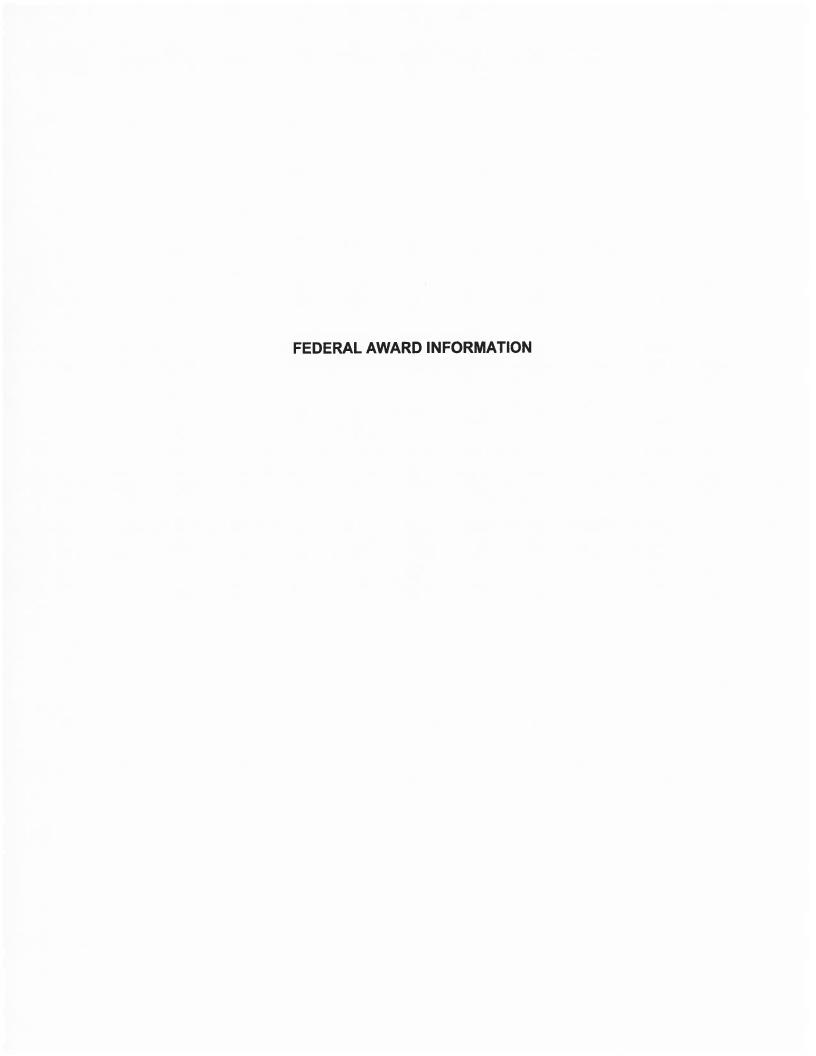
Tipton Community School Fund

The community control and	Prior Year Actual			
Cash Bassints	Actual	Actual		
Cash Receipts	4 400 740			
Local Sources	\$ 498,719	\$ 513,896		
	498,719	513,896		
Expenditures				
Instruction	464,759	518,121		
General Administration	95,641	11,813		
	560,400	529,934		
Receipts Over (Under) Expenditures	(61,681)	(16,038)		
Unencumbered Cash, Beginning	81,264	19,583		
Prior Year Canceled Encumbrances	0	0		
Unencumbered Cash, Ending	\$ 19,583	\$ 3,545		

FOR THE YEAR ENDED JUNE 30, 2022 (With Comparative Actual Totals for the Prior Year Ended June 30, 2021)

Rosetta Stone Fund

	Prior Year Actual	Current Year Actual	
Cash Receipts Local Sources	\$ 36,430 36,430	\$ 33,465 33,465	
Expenditures General Administration	<u>37,700</u> <u>37,700</u>	34,500 34,500	
Receipts Over (Under) Expenditures	(1,270)	(1,035)	
Unencumbered Cash, Beginning	5	(1,265)	
Prior Year Canceled Encumbrances	0	0	
Unencumbered Cash, Ending	\$ (1,265)	\$ (2,300)	





INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF THE FINANCIAL STATEMENT PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

Board of Directors Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629 Salina, Kansas

We have audited, 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, the financial statement of **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629**, **Salina, Kansas**, as of and for the year ended **June 30**, **2022**, and the related notes to the financial statement, which collectively comprise **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629**, **Salina, Kansas'** basic financial statement, and have issued our report thereon dated January 12, 2023. In our report, our opinion on the financial statement was unmodified based on the prescribed basis of accounting that demonstrates compliance with the *Kansas Municipal Audit and Accounting Guide* which is a comprehensive basis of accounting other than accounting principles generally accepted in the United States of America.

Report on Internal Control over Financial Reporting

In planning and performing our audit of the financial statement, we considered Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statement, but not for the purpose of expressing an opinion on the effectiveness of Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' internal control. Accordingly, we do not express an opinion on the effectiveness of Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' internal control.

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 combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statement will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or, significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses or significant deficiencies may exist that were not identified.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas'** financial statement is free from 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 financial statement. 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 no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of This Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the result of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

BTR CPA. LLC

BFR CPA, LLC January 12, 2023



INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE REQUIRED BY THE UNIFORM GUIDANCE

Board of Directors Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629 Salina, Kansas

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' compliance with the types of compliance requirements identified as subject to audit in the OMB Compliance Supplement that could have a direct and material effect on each of Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' major federal programs for the year ended June 30, 2022. Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

In our opinion, Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas complied, in all material respects, with the types of 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, 2022.

Basis for Opinion on Each Major Federal Program

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 the audit requirements of Title 2 U.S. *Code of Federal Regulations (CFR)* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), and the *Kansas Municipal Audit and Accounting Guide*. Our responsibilities under those standards and the Uniform Guidance are further described in the Auditors' Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' major federal programs.

Auditors' Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with auditing standards generally accepted in the United States of America, Government Auditing Standards, and the Uniform Guidance will always detect a material noncompliance when it exists. The risk of not detecting a material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in aggregate, it would influence the judgment made by a reasonable user of the report on compliance about Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with auditing standards generally accepted in the United States of America, *Government Auditing Standards*, and the Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design
 and perform audit procedures responsive to those risks. Such procedures include examining, on a
 test basis, evidence regarding Smoky Hill Central Kansas Education Service Center Interlocal
 School District No. 629, Salina, Kansas' compliance with the compliance requirements referred
 to above and performing such other procedures as we considered necessary in the circumstances.

Obtain an understanding of Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas' internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Report on 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 major federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or 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 major federal program will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a major federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the Auditors' Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weakness or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance, Accordingly, no such opinion is expressed.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the result of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

BFR CPA, LLC BFR CPA, LLC January 12, 2023

SMOKY HILL CENTRAL KANSAS EDUCATION SERVICE CENTER INTERLOCAL SCHOOL DISTRICT NO. 629 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE YEAR ENDED JUNE 30, 2022

	Assistance				
	Listing	P	Program		
Grant Title	Number	A	Amount	Ex	penditures
United States Department of Justice					
STOP School Violence	16.839	\$	279,998	\$	279,998
(Passes Through Kansas Department of Education)	_				
Department of Education					
Special Education Cluster (IDEA)-Cluster					
Special Education-Grants to States	84.027		137,392		137,392
Career and Technical Education-Basic Grants to States	84.048		249,315		249,315
English Language Acquisition State Grants	84.365	-	13,012		13,012
			399,719		399,719
(Passes Through Kansas Department of Corrections)					
Department of Education	_				
Title I Grants to Local Educational Agencies	84.010		82,186		82,186
			82,186		82,186
Total Federal Awards		\$	761,903	\$	761,903

The accompanying notes are an integral part of this schedule.

Note 1 - Basis of Presentation:

The accompanying schedule of expenditures of federal awards includes the federal grant activity of Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas, and is prepared on the basis of accounting as described in Note 1 of the notes to the financial statement. The information in this schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance).

Note 2 - Indirect Cost Rate:

The Interlocal has elected not to use the 10% de minimis cost rate allowed under Section 200.414(f) of the Uniform Guidance.

SUMMARY OF AUDIT RESULTS

- 1. The independent auditors' report expresses an unmodified opinion on the financial statement of Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas.
- 2. No significant deficiencies or material weaknesses were reported in the Report On Internal Control Over Financial Reporting And On Compliance And Other Matters Based On An Audit Of Financial Statements Performed In Accordance With Government Auditing Standards.
- 3. No instances of noncompliance material to the financial statement of **Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas**, were disclosed during the audit.
- 4. No significant deficiencies or material weakness were reported in the Report On Compliance For Each Major Program And On Internal Control Over Compliance Required By The Uniform Guidance.
- 5. The independent auditors' report on compliance for the major federal award programs for Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas, expresses an unmodified opinion on all major federal programs.
- 6. There were no audit findings relative to the major federal award programs for Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas.
- 7. The programs tested as major programs were:

STOP School Violence	16.839
Career and Technical Education-Basic Grants to States	84.048

- 8. The threshold for distinguishing Types A and B programs was \$750,000.
- 9. Smoky Hill Central Kansas Education Service Center Interlocal School District No. 629, Salina, Kansas, was determined not to be a low-risk auditee.

There are no prior audit findings.