# School District of Philadelphia Pennsylvania 

## Schedule of Financial Assistance



Fiscal Year Ended June 30, 2022

# School District of Philadelphia Pennsylvania 

Schedule of Financial Assistance

Fiscal Year Ended June 30, 2022

Prepared By:
Office of General Accounting

## SCHOOL DISTRICT OF PHILADELPHIA <br> SCHEDULE OF FINANCIAL ASSISTANCE FOR THE FISCAL YEAR ENDED JUNE 30, 2022

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## Section I.

## Introductory Section

Tony Watlington
Superintendent

March 28, 2023

Board of Education
School District of Philadelphia
440 North Broad Street, Suite 101
Philadelphia, PA 19130

## Re: $\quad$ Schedule of Financial Assistance and Schedule of Expenditures of Federal Awards

Dear Members of the Board of Education:

The Schedule of Financial Assistance ("SFA") of The School District of Philadelphia ("School District") for the Fiscal Year ended June 30, 2022, which includes the Schedule of Expenditures of Federal Awards ("SEFA"), is submitted herewith. We believe the data, as presented, is accurate in all material aspects; that it is presented in a manner designed to fairly set forth the Federal financial activity of the School District as measured by the financial activity of its various funds; and that all disclosures necessary to enable the reader to gain the maximum understanding of the School District's financial assistance have been included.

## THE FEDERAL SINGLE AUDIT REQUIREMENT

The United States Congress enacted the Single Audit Act Amendments of 1996 (the "Act"), and the President signed the Act into law on July 5, 1996. The Office of Management and Budget ("OMB") issued Title 2 U. S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (Uniform Guidance), in accordance with the Act, to clarify and establish audit requirements for States, Local Governments and Non-Profit Organizations. The Act requires the School District to have an annual audit performed on its entire operations, including separate reporting on its federal financial activity or the SEFA.

The School District's Annual Comprehensive Financial Report ("ACFR") for the Fiscal Year ended June 30, 2022, presents the entire operations of the School District. The ACFR was issued under separate cover on February 14, 2023. The SFA is issued in conjunction with the ACFR in order to comply with the reporting provisions of the Act. The report of the independent auditor on the SEFA, dated March 28, 2023, is reported in conjunction with the Independent Auditor's Reports on Compliance for Each Major Program, and Report on Internal Control over Compliance, as required by the Uniform Guidance. The financial presentations in each report are derived from the same financial activity in the School District's various funds.

Copies of the reporting package (ACFR and SFA) and Data Collection Form must be forwarded to the Federal Audit Clearinghouse or otherwise to the U.S. Bureau of the Census. In addition, a reporting package must be issued to each federal agency providing direct funding and affected by an audit finding on the March 28, 2023

Schedule of Findings and Questioned Costs or the Summary Schedule of Prior Year Findings, and to required state or other governments. The report must be forwarded within the earlier 30 days after receipt of the auditor's report(s), or nine months after our fiscal year-end of June 30, 2022, unless extended. In accordance with the Act, the SFA will be made available for public inspection.

The SEFA of the School District is presented in Section II of the SFA.

## STATE OF PENNSYLVANIA SINGLE AUDIT REQUIREMENT

In June 2019, the Department of Health and Human Services (DHS) reissued the Single Audit Supplement as an aid to local government entities and their independent auditors in the specific auditing and performance of the Single Audit. This supplement provides program-specific auditing and reporting requirements which are applied in conjunction with the Single Audit Act's required standards and guidelines for programs funded through the DHS.

## COGNIZANT AGENCY

The OMB, in accordance with the Act, assigned the U.S. Department of Health and Human Services, National External Audit Review Center as the Cognizant Agency for the School District.

## INDEPENDENT AUDITOR

The Philadelphia Home Rule Charter establishes the City Controller, a separately elected official, as the independent auditor of The School District of Philadelphia. Our Cognizant Agency has recognized the independence of the City Controller and the Single Audit was conducted through her appointed Certified Public Accountant in charge of auditing, in accordance with the provisions of The Philadelphia Home Rule Charter.

## AUDITOR REPORTS

The Single Audit Act, in conjunction with the American Institute of Certified Public Accountants, requires that the auditor issue four reports in connection with its examination of the SEFA: 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, the Report on Compliance for Each Major Program, Report on Internal Control over Compliance, and Report on the Schedule of Expenditures of Federal Awards Required by the Uniform Guidance. These federal and state requirements have been met and the reports are included herein.

## Board of Education

March 28, 2023
Page 3

## PLAN FOR CORRECTIVE ACTION

The Act requires that the School District submit its plan for corrective action to address each audit finding included in the current year's auditor's reports.

## ACKNOWLEDGEMENTS

The preparation of this report was made possible by the dedicated service of the entire staff of the Chief Financial Officer, especially the Office of General Accounting and the Office of Grant Compliance and Fiscal Services. We express our sincere appreciation to all the members of these departments who assisted in and contributed to the preparation of this report. We also thank the Office of the City Controller for their cooperation and assistance.

## Respectfully,



Chief Executive Officer and Superintendent

## Section II.

## Schedule of Expenditures of Federal Awards


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## SCHOOL DISTRICT OF PHILADELPHIA

NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE FISCAL YEAR ENDED JUNE 30, 2022

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## SCHOOL DISTRICT OF PHILADELPHIA NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE FISCAL YEAR ENDED JUNE 30, 2022

1. Government of the School District

The School District of Philadelphia (the "School District") is a separate and independent home rule school district of the first class established by the Education Supplement to the Philadelphia Home Rule Charter (the "Charter") in December 1965. It is the largest school district in the Commonwealth of Pennsylvania (the "Commonwealth"), serving over 197,500 students, including Charter Schools. The School District is the tenth largest in the United States in enrollment and employs more than 20,400 full-time professional and nonprofessional persons. The boundaries of the School District are coterminous with the boundaries of the City of Philadelphia (the "City").

The School District is a political subdivision of the Commonwealth created to assist in the administration of the General Assembly's duties under the Constitution of the Commonwealth to "provide for the maintenance and support of a thorough and efficient system of public education to serve the needs of the Commonwealth". Although the School District is an independent legal entity, it is considered to be a component unit of the City of Philadelphia for reporting purposes and is included in the City's Annual Comprehensive Financial Report.

Local governance by a Board of Education (Board) consisting of nine members appointed by the Mayor of the City of Philadelphia began on July 1, 2018 to coincide with the dissolution of the School Reform Commission at the end of the reporting period of Fiscal Year 2018. As prescribed, the Board is responsible for the School District's overall operation, management, and educational programs, including all budgetary and financial matters presented herein. The duties of the Board generally include, but are not limited to, the formulation of educational policy, the adoption of an annual budget, the development of a comprehensive capital improvement budget and program, and the incurrence of indebtedness. The Superintendent of Schools beginning on July 1, 2018 reports to the local Board. During the Fiscal Year 2022 reporting period, the Superintendent was Dr. William R. Hite, Jr. and the Chief Financial Officer was Uri Z. Monson. The Superintendent retired after a decade-long tenure at the end of the 2021-2022 School Year and a new Superintendent, Dr. Tony B. Watlington, Sr. assumed leadership of the District for the Fiscal Year 2023 reporting period.

The School District also serves as the agent for the Intermediate Unit No. 26, an entity established by the Commonwealth to provide special education, special education transportation, and related management services.
2. Organization and Scope

For the fiscal year ended June 30, 2022, the School District of Philadelphia is presenting a Single Audit Report on expenditures of federal awards. This report is issued 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). The U.S. Department of Health and Human Services, National External Audit Review Center has been designated the organization-wide cognizant agency for the School District of Philadelphia's single audit.

## 3. Major Programs

Major federal programs are identified in the Summary of Auditor's Results section of the Schedule of Findings and Questioned Costs.

## SCHOOL DISTRICT OF PHILADELPHIA NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE FISCAL YEAR ENDED JUNE 30, 2022

4. Schedule of Expenditures of Federal Awards

Information contained in the Schedule of Expenditures of Federal Awards (SEFA) is derived from the School District's accounting systems. For reporting purposes, the School District adheres to the significant accounting policies which are in conformance with generally accepted accounting principles (GAAP) for local governmental units as prescribed by the Governmental Accounting Standards Board. Program expenditures recorded in the SEFA are presented on the modified accrual basis of accounting. The accompanying SEFA includes the federal grant activity of the School District under federal financial assistance programs for the year ended June 30, 2022. The information in this schedule is presented in accordance with the requirements of the Uniform Guidance. Because the schedule presents only a selected portion of operations of the School District, it is not intended to present the financial position or changes in net position. Federal programs considered active during the year ended June 30, 2022, are reflected in the SEFA. An active federal program is defined as a federal program that incurred expenditures (adjustments) of funds or accrued (deferred) grant revenue adjustments during the fiscal year or a federal program considered as not completed or closed out at the beginning of the fiscal year.

Accrued and Unearned Grant Revenue - various worksheet schedules are used for the federal awards received by the School District. Consequently, timing differences between the recognition of revenues and related cash receipts can exist at the beginning and end of the fiscal year. Accrued grant revenue balances represent the excess of revenue recognized over cash received to date. Unearned grant revenue balances represent the excess of cash received over revenue recognized to date.
5. Schedule of Expenditures of Federal Awards - National School Lunch Program - AL \#10.555 Information contained in the Schedule of Expenditures of Federal Awards (SEFA) for AL \#10.555 - National School Lunch Program - includes Non-Cash Assistance pertaining to food commodities distributed by the United States Department of Agriculture (USDA). Commodities are identified with the programs under which USDA donated the commodities.
6. Indirect Cost Rate

The amount expended includes amounts claimed as indirect cost recovery using an approved indirect cost rate percent calculated by the Pennsylvania Department of Education or as per the funding agency's approved budget. The School District has not elected to use the 10-percent de minimis indirect cost rate allowed under the Uniform Guidance.
7. COVID 19 FEMA Grant - AL \# 97.036

Expenditures related to the COVID 19 FEMA Grant (AL 97.036) that occurred in Fiscal Year 2021 are being reported in the current year's SEFA because the grant was not approved until Fiscal Year 2022. In accordance with the uniform guidance, the grant expenditures were not reported in the Fiscal Year 2021 SEFA. The grant amount approved in Fiscal Year 2022 was $\$ 2,670,334.08$. The prior year expenditures of $\$ 2,670,334.08$, are included in this SEFA.

## Section III.

## Independent Auditor's Reports on Compliance and Internal Control



O F
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# P H I L A D E L P H I A 

CHARLES EDACHERIL
Acting City Controller

# INDEPENDENT AUDITOR'S 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 

To the President and Members of The Board of Education of the School District of Philadelphia

We have audited, in accordance with the 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 statements of the governmental activities, the businesstype activities, each major fund, and the aggregate remaining fund information of the School District of Philadelphia, Pennsylvania (School District), a component unit of the City of Philadelphia, Pennsylvania, as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise the School District's basic financial statements, and have issued our report thereon dated February 14, 2023.

## Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the School District's 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 opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the School District's internal control. Accordingly, we do not express an opinion on the effectiveness of the School District's 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 a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or a 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.

## $\begin{array}{llllllllllllllllll}\text { C } & \text { I } & \text { T } & Y & \text { O } & \text { F } & \text { P } & \text { H I } & \text { I } & \text { A } & \text { D } & \text { E } & L & \text { P } & H & I & A\end{array}$ OFFICE OF THE CONTROLLER

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 and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. We identified certain deficiencies in internal control, described in the accompanying schedule of findings and questioned costs as item 2022-001 that we consider to be a significant deficiency.

## Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the School District's financial statements are 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 statements. 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.

## School District's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the School District's response to the findings identified in our audit and described in the accompanying schedule of findings and questioned costs. The School District's response was not subjected to the other auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on the response.

## 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 results 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.

## Chorles Edachamil

CHARLES EDACHERIL, CPA

Acting City Controller
Philadelphia, Pennsylvania
February 14, 2023


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## INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE; AND REPORT ON SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY THE UNIFORM GUIDANCE

To the President and Members of The Board of Education of the
School District of Philadelphia

Report on Compliance for Each Major Federal Program

## Opinion on Each Major Federal Program

We have audited the School District of Philadelphia, Pennsylvania's (School District) 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 the School District's major federal programs for the year ended June 30, 2022. The School District's major federal programs are identified in the summary of auditor's results section of the accompanying Schedule of Findings and Questioned Costs.

In our opinion, the School District complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 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 (GAAS); 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 Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

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We are required to be independent of the School District and to meet our other ethical responsibilities, in accordance with 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 the School District's 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 the School District's federal programs.

## Auditor's 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 the School District's 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 GAAS, Government Auditing Standards, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting 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 the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the School District's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with GAAS, 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 the School District's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of the School District's 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 the School District's internal control over compliance. Accordingly, no such opinion is expressed.


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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.

## Other Matters

The results of our auditing procedures disclosed an instance of noncompliance which is required to be reported in accordance with the Uniform Guidance and which is described in the accompanying Schedule of Findings and Questioned Costs as item 2022-002. Our opinion on each major federal program is not modified with respect to this matter.

Government Auditing Standards requires the auditor to perform limited procedures on the School District's response to the noncompliance findings identified in our compliance audit described in the accompanying Schedule of Findings and Questioned Costs. The School District's response was not subjected to the other auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

## Report on Internal Control over Compliance

Our consideration of internal control over compliance was for the limited purpose described in the Auditor's 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 and therefore, material weaknesses or significant deficiencies may exist that were not identified. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, as discussed below, we did identify certain deficiencies in internal control over compliance that we consider to be significant deficiencies.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. 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 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. We consider the deficiencies in internal control over compliance described in the accompanying Schedule of Findings and Questioned Costs as item 2022-002 to be a significant deficiency.

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.

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Government Auditing Standards requires the auditor to perform limited procedures on the School District's response to the internal control over compliance findings identified in our compliance audit described in the accompanying Schedule of Findings and Questioned Costs. The School District's response was not subjected to the other auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

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 results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

## Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

We have audited the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the School District, a component unit of the City of Philadelphia, Pennsylvania, as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise the School District's basic financial statements. We have issued our report thereon dated February 14, 2023, which contained unmodified opinions on those financial statements. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. The accompanying Schedule of Expenditures of Federal Awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the basic financial statements. 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 statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the Schedule of Expenditures of Federal Awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

## Chorles Zeluchemil

CHARLES EDACHERIL, CPA

Acting City Controller
Philadelphia, Pennsylvania
March 28, 2023

## Section IV.

## Schedule of Findings and Questioned Costs

## Section I - Summary of Auditor's Results:

## Financial Statements:

Type of auditor's report issued: Unmodified

Internal control over financial reporting:
Material weakness(es) identified? yes X no
Significant deficiency(ies) identified? X yes ___none reported
Noncompliance material to financial statements noted?__yes $\quad$ X no

## Federal Awards:

Internal control over major federal programs:

Material weakness(es) identified?___yes X__no
Significant deficiency(ies) identified? X yes __none reported

Type of auditor's report issued on compliance for major federal programs: Unmodified

Any audit findings disclosed that are required to be reported in accordance with 2 CFR Section 200.516(a)
$\qquad$

Identification of major federal programs:

| Name of Federal Program or Cluster | Assistance Listing Number(s) |
| :--- | :--- |
| Child and Adult Care Food Program | 10.558 |
| Special Education Cluster |  |
| Special Education Grants to States | 84.027 |
| Special Education Preschool Grants | 84.173 |
| Supporting Effective Instruction State Grants | 84.367 |
| Education Stabilization fund | 84.425 |
| Epidemiology and Laboratory Capacity for Infectious Diseases | 93.323 |
| Temporary Assistance for Needy Families | 93.558 |
| Head Start | 93.600 |
| Disaster Grants - Public Assistance | 97.036 |

Dollar threshold used to distinguish between Type A and Type B programs: $\$ 3,258,919$

Auditee qualified as low-risk auditee? $\underline{\mathrm{X}}$ yes $\qquad$ no

# Section II - Financial Audit Significant Deficiency: 

## 2022-001 Inadequate Review of Access Controls and Segregation of 23 Duties

Section III - Federal Awards Findings and Questioned Costs:
$\begin{array}{ll}\text { 2022-002 } & \text { Reporting - Significant Deficiency and Compliance Finding } \\ & \text { AL 93.600 Head Start }\end{array}$

## 2022-001 INADEQUATE REVIEW OF ACCESS CONTROLS AND SEGREGATION OF DUTIES

Condition: Prior year testing noted that a formally documented Segregation of Duties (SoD) policy, including identification of incompatible roles, responsibilities, and permissions, has not been established. Users have been assigned access based upon job function role and location, however the specific access permissions of the roles have not been reviewed by the School District of Philadelphia (School District). Due to this condition, identification of incompatible permissions within roles or across roles has not been performed. In addition, a periodic user access review has not been performed since the implementation of the system which went live July 1, 2020. Finally, a documented security program or policy, which includes the School District's responsibilities over the Oracle system, was not provided. Our current year follow up disclosed that as of June 30, 2022, corrective action to prevent the recurrence of this condition has not been implemented.

Criteria: Although the Oracle system is a vendor hosted system, there are aspects of the security and provisioning of access to the system, which is the responsibility of the School District. Incompatible roles, responsibilities, and permissions should be established to enforce SoD in both the provisioning and the periodic reviewing of user access.

Effect: There may be users with access not commensurate with their job responsibilities. In addition, users may have access across incompatible roles, responsibilities and permissions within the system, thereby potentially allowing a user to bypass system controls.

Cause: As part of the implementation of the system, there was not a required step to identify incompatible user access permissions. A periodic review of access has not been performed due to the current focus on the implementation of the Oracle HR system.

Recommendation: The School District should formally identify the areas of responsibility related to security and provisioning of access related to the Oracle system and include them in an overall security program or policy. As part of this security program or policy, a requirement for the performance of a periodic access review should be included. There should also be a comprehensive document that clearly identifies incompatible roles, responsibilities, and permissions. These SoD considerations should be included in the periodic access reviews.

## Views of Responsible Officials and Corrective Action Plan:

To address the audit finding of the security policy, The School District has taken the necessary steps to implement a formal plan. In order to do that with the components outlined in the finding, we have implemented a process for the security plan diagnosis which will lead to a formal policy to include: overall diagnosis, prescription and policy plan. This work began on $9 / 1 / 22$ and is scheduled to conclude $3 / 31 / 23$, as outlined in the below timeline. Most of the work has been completed as of the date of this response, $3 / 21 / 23$.

1. Security Plan analysis $9 / 1 / 22-9 / 30 / 2022$

- Identify current roles and profiles of Finance positions - Complete

2. Duty Policy $10 / 1 / 22-1 / 31 / 23$

- Create a segmentation of duty policy where we have identified the incompatible roles Complete

3. Security Plan Diagnosis $10 / 1 / 22-3 / 31 / 23$

- Identify risks in current security. All department reviews are complete. Of the 128 action items identified and documented, eight action items remain to be completed. The remaining eight action items will be completed by the end of March 2023

4. Annual Review

- Perform annual review every May and complete each review at the end of the Fiscal Year.

5. Security Policy - 9/1/22-3/31/23

- All steps above will be included in the overarching security policy for The School District. The policy was provided during the audit; however the policy will be updated to reflect the necessary changes including requiring an annual review.


## 2022-002 REPORTING - SIGNIFICANT DEFICIENCY AND COMPLIANCE FINDING

## Assistance Listing 93.600 Head Start

Condition: During our test for compliance with the Federal Funding Accountability and Transparency Act (FFATA), we noted that the School District of Philadelphia (School District) did not have a process in place to report subawards made under the federal Head Start program in accordance with the FFATA and award agreement. Consequently, auditors could not test for FFATA reporting compliance for this grant program. Funding for this program is from the Department of Health and Human Services.

Criteria: Per the OMB's Uniform Guidance 2 CFR Part 170, the prime recipient of a federal award must report information regarding first-tier subawards of $\$ 30,000$ or more utilizing the FFATA Subaward Reporting System (FSRS), and states that the subaward reporting requirement applies to all types of firsttier subawards. The reporting is required by the end of the month following the month in which the award is made.

Effect: Federal grantors may not have complete and accurate information to make fiscal decisions on federal awards. Additionally, there could be a lack of transparency and accountability to the public on how federal dollars are spent.

Cause: School District management was not aware of the FFATA reporting requirement. Therefore, School District management did not have a systematic process in place to report subawards made under the federal Head Start program in accordance with FFATA.

Recommendation: School District's management should develop written policies and procedures which ensure that it complies with the FFATA requirement to file first-tier subaward reports.

## Views of Responsible Officials and Corrective Action Plan:

The District agrees with this finding. The District will ensure that all federal awards are reviewed for FFATA reporting and will codify the method by which that occurs in a formal procedure.

Marcy Blender, Comptroller, Office of Finance, School District of Philadelphia, 215-400-5435

## Section V.

## Summary Schedule of Prior Audit Findings

# THE SCHOOL DISTRICT OF PHILADELPHIA <br> COMPTROLLER'S OFFICE <br> 440 N. Broad Street, Ste. 322 <br> Philadelphia, Pennsylvania 19130 

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## Federal Findings and Questioned Costs - June 30, 2021

Status: Unresolved
Questioned cost: $\$ 0.00$

## 2021-001 INADEQUATE REVIEW OF ACCESS CONTROLS AND SEGREGATION OF DUTIES - SIGNIFICANT DEFICIENCY

Condition: As part of our audit of the School District's fiscal 2021 Annual Comprehensive Financial Report, we engaged an independent accounting firm to perform an assessment of the information technology application and general controls related to the School District's new Oracle system which replaced its legacy ADVANTAGE system for general ledger processing.

This review noted that the School District has not established a formally documented Segregation of Duties policy that includes the identification of incompatible roles, responsibilities, and permissions. System users have been assigned access based on job function role and location, however, the specific access permissions of the roles have not been reviewed by the District. Due to the lack of review, the identification of incompatible permissions within or across roles has not been performed. In addition, a periodic user access review has not been performed since the implementation of the system, which went live on July 1, 2020. Lastly, a documented security program or policy, including the District's responsibility over the Oracle system, was not provided.

## 2022 Update:

To address the audit finding of the security policy, The School District of Philadelphia has undertaken a thorough process to implement a formal security plan with the recommendations outlined in the audit finding. The School District is completing the security plan diagnosis phase which will lead to a formal policy to include: overall diagnosis, prescription, and policy plan. This work began on $9 / 1 / 22$ and will conclude $2 / 28 / 23$.

Steps 1 and 2 below are complete. Steps 3 and 5 are 50\% complete and will be finalized by February 28, 2023. Step 4 will begin in May of 2023 and annually thereafter.

1. Security Plan analysis 9/1/22-9/30/2022

- Identify current system roles and profiles of Finance and Operations administrative user's access to the ERP Finance System modules - Complete

2. Segregation of Duty Policy 10/1/22 - 1/31/23

- Create a segregation of duty policy where we have identified the incompatible roles - Complete

3. Security Plan Diagnosis 10/1/22-2/28/23

- Identify risks in current security - As part of this step; roles that are incompatible will be removed and where applicable custom roles will be created - Security Plan identification of risks is Complete. Custom Roles are in the process of being created.

4. Annual Review

- Perform annual review every May and will be completed at the end of the Fiscal

Year - The first annual review will be May 2023 and then annually every May thereafter
5. Security Policy - 9/1/22-2/28/23

- All steps above will be included in the overarching security policy for The School

District. The policy was provided during the audit; however, the policy will be updated to reflect additional policies and an annual review.

# THE SCHOOL DISTRICT OF PHILADELPHIA <br> COMPTROLLER'S OFFICE <br> 440 N. Broad Street, Ste. 322 <br> Philadelphia, Pennsylvania 19130 

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Federal Findings and Questioned Costs - June 30, 2021
CFDA\# 84.425 Status: Unresolved Questioned Cost: \$0.00

2021-002 CASH MANAGEMENT - SIGNIFICANT DEFICIENCY AND COMPLIANCE FINDING

## Education Stabilization Funds - CFDA \#84.425

Condition: In our review of the School District's (District) interest calculations and remittances for grants that received advanced funds, we found that the District did not include $\$ 9,151$ of interest earned on advances received from the PA Department of Education (PDE). The interest calculation for the Education Stabilization Funds Program (ESF) was erroneously omitted from the District's annual interest calculation and remittance in February 2022. District management concurred with our finding and recalculated the interest due, and remitted the funds to the PDE. The funding for this grant is from the U.S. Department of Education.

## 2022 Update:

The District has ensured its policies and procedures regarding the periodic calculation of interest-earned on federal funds are consistent with OMB Uniform Guidance 200.305. After discussions with our auditors, in order to prevent omissions or errors in the calculation going forward, the District made an amendment to its calculation procedures effective July 1, 2022.

The procedures were updated to include additional reviews in the general accounting and grant fiscal services departments to ensure all eligible federal grant awards are included before the interest calculation is finalized and payment remitted.

## Section VI.

## Corrective Action Plan

# THE SCHOOL DISTRICT OF PHILADELPHIA 

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## Corrective Action Plan

Finding number 2022-001
Inadequate Review of Access Controls and Segregation of Duties
Contact Person - Marcy Blender - Comptroller - 215-400-5435
Anticipated completion date: - March 31, 2023

View of responsible officials and Planned Corrective Action

To address the audit finding of the security policy, The School District has taken the necessary steps to implement a formal plan. In order to do that with the components outlined in the finding, we have implemented a process for the security plan diagnosis which will lead to a formal policy to include: the overall diagnosis, prescription and policy plan. This work began on 9/1/22 and is scheduled to conclude $3 / 31 / 23$, as outlined in the below timeline. Most of the work has been completed as of the date of this response, 3/21/23.

1. Security Plan analysis 9/1/22-9/30/2022

- Identify current roles and profiles of Finance positions - Complete

2. Duty Policy $10 / 1 / 22-1 / 31 / 23$

- Create a segmentation of duty policy where we have identified the incompatible roles Complete

3. Security Plan Diagnosis $10 / 1 / 22-3 / 31 / 23$

- Identify risks in current security. All department reviews are complete. Of the 128 action items identified and documented, eight action items remain to be completed. The remaining eight action items will be completed by the end of March 2023

4. Annual Review

- Perform annual review every May and complete each review at the end of the Fiscal Year.

5. Security Policy -9/1/22-3/31/23

- All steps above will be included in the overarching security policy for The School District. The policy was provided during the audit; however, the policy will be updated to reflect the necessary changes including requiring an annual review.


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Comptroller

## Corrective Action Plan

Finding number 2022-002
Reporting - Significant Deficiency and Compliance Finding
Assistance Listing 93.600 Head Start
Contact Person - Marcy Blender - Comptroller - 215-400-5435

Anticipated completion date: Four months - July 31, 2023

View of responsible officials and Planned Corrective Action

The District agrees with this finding. The District will ensure that all federal awards are reviewed for FFATA reporting and will codify the method by which that occurs in a formal procedure.

