LANSING SCHOOL DISTRICT

ADDITIONAL REPORTS REQUIRED BY OMB CIRCULAR A-133

YEAR ENDED JUNE 30, 2011

CONTENTS

	<u>Page</u>
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	1 - 2
Report on compliance with requirements that could have a direct and material effect on each major program and on internal control over compliance in accordance with OMB Circular A-133	3 - 5
Schedule of expenditures of federal awards	6 - 11
Notes to schedule of expenditures of federal awards	12
Schedule of findings and questioned costs	13 - 17
Schedule of prior audit findings	18 - 19
Corrective action plan	20 - 21



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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 Board of Education Lansing School District

We have audited the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of Lansing School District as of and for the year ended June 30, 2011, which collectively comprise Lansing School District's basic financial statements and have issued our report thereon dated October 11, 2011. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States.

Internal Control Over Financial Reporting

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

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over financial reporting that might be significant deficiencies, or material weaknesses and therefore, there can be no assurance that all deficiencies, significant deficiencies, or material weaknesses have been identified. However, as described in the accompanying schedule of findings and questioned costs, we identified certain deficiencies in internal control over financial reporting that we consider to be material weaknesses and other deficiencies that we consider to be significant deficiencies.

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. We identified a certain deficiency in internal control over financial reporting, described in the accompanying schedule of findings and questioned costs, that we consider to be material weakness in internal control over financial reporting, 2011-1

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. We identified a certain deficiency in internal control over financial reporting, described in the accompanying schedule of findings and questioned costs, that we consider to be significant deficiency in internal control over financial reporting, 2011-2.

Compliance and Other Matters

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

We noted certain matters that we reported to management of Lansing School District in a separate letter dated October 11, 2011.

Lansing School District's response to the finding identified in our audit is described in the accompanying corrective action plan. We did not audit Lansing School District's response and, accordingly, we express no opinion on it.

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

Manes Costerian PC

October 11, 2011



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

INDEPENDENT AUDITORS' REPORT

To the Board of Education Lansing School District

Compliance

We have audited Lansing School District's compliance with the types of compliance requirements described in the OMB *Circular A-133 Compliance Supplement* that could have a direct and material effect on each of Lansing School District's major federal programs for the year ended June 30, 2011. Lansing School District's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts and grants applicable to each of its major federal programs is the responsibility of Lansing School District's management. Our responsibility is to express an opinion on Lansing School District's compliance based on our audit.

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

In our opinion, Lansing 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, 2011. However, the results of our auditing procedures disclosed instances of noncompliance with those requirements which is required to be reported in accordance with OMB Circular A-133 and which is described in the accompanying schedule of findings and questioned costs as item 2011-3 and 2011-4.

Internal Control Over Compliance

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

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 2011-3 and 2011-4 to be material weaknesses.

Schedule of Expenditures of Federal Awards

We have audited the financial statements of the governmental activities, each major fund and the aggregate remaining fund information of Lansing School District as of and for the year ended June 30, 2011, and have issued our report thereon dated October 11, 2011. Our audit was performed for the purpose of forming opinions on the financial statements that collectively comprise Lansing School District's basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements, and, in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

Lansing School District's responses to the findings identified in our audit are described in the accompanying schedule of findings and questioned costs. We did not audit Lansing School District's responses and, accordingly, we express no opinion on the responses.

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

Manes Costerisan PC

October 11, 2011

Federal grantor/pass-through grantor/program title	District ID <u>Number</u>	Federal CFDA <u>Number</u>	Pass-through Grantor's <u>Number</u>	Approved Award <u>Amount</u>	(Memo only) Prior Year Expenditures	Accrued (Deferred) Revenue 6/30/2010	<u>Adjustments</u>	Current Year <u>Expenditures</u>	Current Year Receipts (Cash Basis)	Accrued (Deferred) Revenue 6/30/2011
U.S. Department of Agriculture:										
Passed through Michigan Department of Education:										
Child Nutrition Cluster										
Non-Cash Assistance (donated foods):										
National School Lunch - Entitlement	N/A	10.555		\$ 248,084	\$ 253,307	\$ -	\$ -	\$ 248,084	\$ 248,084	\$ -
National School Lunch - Bonus	N/A	10.555		32,005	87,804	-	-	32,005	32,005	-
				280,089	341,111		-	280,089	280,089	-
Summer Food Service	N/A	10.559		171,260	61,579			171,260	171,260	
Total non-cash assistance				451,349	402,690			451,349	451,349	
Cash Assistance:										
National School Lunch - Section 4	N/A	10.555	101950	384,950	384,950	66,483	-	-	66,483	-
National School Lunch - Section 11	N/A	10.555	101960	2,992,838	2,992,838	523,330	-	-	523,330	-
National School Lunch - Snack	N/A	10.555	101980	43,427	43,427	3,578	-	-	3,578	-
National School Lunch - Section 4	N/A	10.555	111950	363,814	-	-	-	363,814	356,136	7,678
National School Lunch - Section 11	N/A	10.555	111960	3,340,745				3,340,745	2,750,175	590,570
				7,125,774	3,421,215	593,391		3,704,559	3,699,702	598,248
Summer Food Service	5992	10.559	111900	39,620	-	-	-	39,620	-	39,620
Summer Food Service	5991	10.559	101900	143,483	33,903	33,903	-	109,580	143,483	-
				183,103	33,903	33,903	-	149,200	143,483	39,620
National School Lunch - Breakfast	N/A	10.553	101970	1,762,265	1,762,265	288,580		-	288,580	
National School Lunch - Breakfast	N/A	10.553	111970	1,762,262	-	-	-	1,931,614	1,604,571	327,043
				3,524,527	1,762,265	288,580	-	1,931,614	1,893,151	327,043
Total cash assistance				10,833,404	5,217,383	915,874		5,785,373	5,736,336	964,911
Total child nutrition cluster				11,284,753	5,620,073	915,874		6,236,722	6,187,685	964,911
Fruit and Vegetable Program - North	5790	10.582	100950/06662	31,671	31,671	2,187	-	-	2,187	_
Fruit and Vegetable Program - North	5791	10.582	110950/06662	19,700	- ,	-	-	19,045	17,412	1,633
5 5				51,371	31,671	2,187	-	19,045	19,599	1,633
North School Gardens Grant	1230	10.574	0919-F1	2,500	1,704	1,704		795	2,163	336
Supper Program	5780	10.558	101920	21,476	25,291	3,815			3,815	
TOTAL U.S. DEPARTMENT OF AGRICULTU	JRE			11,360,100	5,678,739	923,580	-	6,256,562	6,213,262	966,880

Federal grantor/pass-through grantor/program title	District ID <u>Number</u>	Federal CFDA <u>Number</u>	Pass-through Grantor's <u>Number</u>	Approved Award <u>Amount</u>	(Memo only) Prior Year <u>Expenditures</u>	Accrued (Deferred) Revenue 6/30/2010	<u>Adjustments</u>	Current Year <u>Expenditures</u>	Current Year Receipts (Cash Basis)	Accrued (Deferred) Revenue <u>6/30/2011</u>
U.S. Department of Education:										
Direct programs:										
Impact Aid	1361	84.041		\$ 5,895	\$ -	\$ -	\$ -	\$ 5,894	\$ 5,894	\$ -
Indian Education	1300	84.060A	S060A090962	36,011	36,011	2,545	-	-	2,545	-
Indian Education	1301	84.060A	S060A090962	31,505	-	-	-	27,738	24,976	2,762
				67,516	36,011	2,545		27,738	27,521	2,762
Magnet Schools - SMART	1500	84.165A	U165A070064-09	2,408,436	2,243,179	356,899	-	165,258	522,157	_
Magnet Schools - SMART - Carryover	1501	84.165A	U165A070064-09	482,049	-	-	-	476,930	321,337	155,593
Magnet Schools - SMART - Carryover	1508	84.165A	U165A070064	1,481,297	53,874	2,864	-	-	2,864	_
Magnet Schools - SMART	1509	84.165A	U165A070064	2,370,156	461,535	3,457	-	-	3,457	-
-				6,741,938	2,758,588	363,220		642,188	849,815	155,593
LINK - Local Intervention Network for Kids	1280	84.184A	Q184A070052	291,135	291,135	41,478	-	-	41,478	_
LINK - Local Intervention Network for Kids	1290	84.184A	Q184A070052	125,585	125,585	14,010	-	-	14,010	_
LINK - Local Intervention Network for Kids - Carryover	1291	84.184A	Q184A070052	157,450	-	· <u>-</u>	-	141,750	141,750	_
•				574,170	416,720	55,488		141,750	197,238	
Teaching American History	1570	84.215X	U215X090579	326,621	221,496	31,036	-	86,057	116,966	127
Teaching American History	1571	84.215X	U215X090579	335,070	-	· -	-	236,644	171,427	65,217
				661,691	221,496	31,036		322,701	288,393	65,344
Foreign Language Assistance Program	1520	84.293B		233,281	214,356	22,784	_	18,925	41,709	_
Foreign Language Assistance Program	1521	84.293B		299,402		,	_	191,905	169,071	22,834
				532,683	214,356	22,784		210,830	210,780	22,834
PAINTS	1590	84.351D	U351D060071-09	274,903	135,613	42,683		_	42,683	_
PAINTS	1591	84.351D	U351D060071-09	267,178	155,015	72,003	-	267,177	233,201	33,976
PAINTS	1598	84.351D	U351D060071-09	274,974	57,901	24,650	-	207,177	24,650	-
PAINTS	1599	84.351D	U351D060071-09	274,976	99,036	3,790	_	_	3,790	_
	,	J.1.001D	222220000,107	1,092,031	292,550	71,123		267,177	304,324	33,976
				-,-,-,-,-		,120				

									Accrued			(Current	Accrued
	District	Federal	Pass-through		Approved		1emo only)	,	Deferred)		Current		Year	(Deferred)
	ID	CFDA	Grantor's		Award		rior Year		Revenue		Year		Receipts	Revenue
Federal grantor/pass-through grantor/program title	Number	Number	Number		<u>Amount</u>	Ex	<u>rpenditures</u>	6	<u>5/30/2010</u>	<u>Adjustments</u>	Expenditures	(C	ash Basis)	6/30/2011
U.S. Department of Education:														
Passed through Michigan Department of Education:														
Federal Adult Ed English	1080	84.002A	101120/105057	\$	15,518	\$	15,518	\$	3,373	\$ -	\$ -	\$	3,373	\$ -
Federal Adult Ed English	4060	84.002A	101130/101057		120,000		120,000		21,180	-	-		21,180	-
Federal Adult Ed English	4090	84.002A	101190/101057		70,000		70,000		14,795	-	-		14,795	-
Federal Adult Ed English	1081	84.002A	111120/115057		13,500		-		-	-	12,812		10,224	2,588
Federal Adult Ed English	4061	84.002A	111130/111057		72,000		-		-	-	71,402		56,931	14,471
Federal Adult Ed English	4091	84.002A	111190/111057		58,500		-		-	-	56,310		45,262	11,048
				_	349,518		205,518		39,348		140,524		151,765	28,107
ECIA Title 1 - School Improvement	1010	84.010	101550/0910		151,920		6,617		6,617	_	51,864		58,481	_
ECIA Title 1 - School Improvement	1011	84.010	111550/1011		75,000				-	_	21,895		19,617	2,278
ECIA Title I - Regular	1000	84.010	101530/0910		9,671,479		7,829,770		1,393,805	_	499,133		1,892,938	=,==
ECIA Title I - Regular	1001	84.010	111530/1011		10,708,642		-,025,770		-	_	6,926,994		6,379,972	547,022
ZOLI IMO I ROGUM	1001	0010	111000,1011	_	20,607,041		7,836,387		1,400,422		7,499,886		8,351,008	549,300
				_	20,007,011		7,030,307		1,100,122		1,155,000		0,551,000	21,,500
ARRA Title I, Part A	1330	84.389	101535/0910		3,378,121		1,476,477		422,564	-	531,041		953,605	-
ARRA Title I, Part A	1331	84.389	11535/1011		2,333,977		-		-	-	2,333,977		888,306	1,445,671
ARRA Title I, School Improvement	1311	84.389A	101555/0910		179,221		_		-	-	26,585		1,374	25,211
ARRA Title I, Part D	1030	84.389	101705/0910		163,245		44,036		14,003	-	2,648		16,651	-
ARRA Title I, Part D	1031	84.389	111705/1011		119,957		_		-	-	111,913		34,258	77,655
					6,174,521		1,520,513		436,567	_	3,006,164		1,894,194	1,548,537
Total Title 1 Cluster					26,781,562		9,356,900		1,836,989		10,506,050		10,245,202	2,097,837
ECHA TELL I N. O. D.	1020	84.013	101700/0010		212 200		112 620		24.675		20.050		44.725	
ECIA Title I - N & D			101700/0910		313,398		112,620		24,675	-	20,060		44,735	(22.742)
ECIA Title I - N & D	1021	84.013	091700/0809		348,963		112,620		24,675		49,863 69,923		83,605 128,340	(33,742)
				_	662,361		112,620		24,675		09,923		128,340	(33,742)
Drug Free Schools	4000	84.186	102860/0910		132,513		95,161		12,523	-	17,914		30,437	-
Drug Free Schools	4001	84.186	112860/1011		19,438		_		-	-	17,696		14,039	3,657
					151,951		95,161		12,523		35,610		44,476	3,657
CSHP Grant	1551	84.186A			1,328		-		-	-	1,326		1,303	23
24/7 Tobacco Free Schools	4011	84.186A	112861/1101B		5,000		-				2,752		262	2,490
					6,328		-				4,078		1,565	2,513
Education for Homeless Children and Youth	4400	84.196A	102320/0910		17,031		14,292		1,636		2,739		4,375	
Education for Homeless Children and Youth	4400	84.196A	112320/1011		45,291		14,292		1,030	-	30,605		25,832	4,773
Education for Homeless Children and Youth - Carryover	4411	84.196A	102320/1011		27,040		-		-	-	27,040		15,703	11,337
Education for Homeless Children and Touth - Carryover	4411	04.170A	102320/1011		89,362		14,292		1,636		60,384		45,910	16,110
					07,302		14,292		1,030		00,384		43,710	10,110

Proper P	Federal grantor/pass-through grantor/program title	District ID <u>Number</u>	Federal CFDA <u>Number</u>	Pass-through Grantor's <u>Number</u>	Approved Award <u>Amount</u>	(Memo only) Prior Year Expenditures	Accrued (Deferred) Revenue 6/30/2010	<u>Adjustments</u>	Current Year <u>Expenditures</u>	Current Year Receipts (Cash Basis)	Accrued (Deferred) Revenue <u>6/30/2011</u>
March Homeless Child K Youth Cinart 44,0 43,0 43,0 1023250910 129,565 129,570 125,0 125,0 125,0 127,0 125,0 127,0 128,0	U.S. Department of Education:										
Part	Passed through Michigan Department of Education (continued	1):									
21st Century 1370 84.28°C 102110/D07043 600,000 490,115 82,410 536,523 41.555 94.958 21st Century 1371 84.28°C 12210/D07043 600,000	ARRA Homeless Child & Youth Grant	4420	84.387A	102325/0910	\$ 40,203	\$ 10,478		\$ -	\$ 29,249	\$ 29,146	\$ 1,051
Part	Total Education for Homeless Children & You	uth Cluster			129,565	24,770	2,584		89,633	75,056	17,161
Title III Technology	21st Century	1370	84.287C	102110/D07043	600,000	490,115	82,410	-	-	82,410	_
Title IID Technology (ARRA) 1271 84.386 114299/0910 36,034 56,034 26,951 . 109,055 139,220 29,335 Total Title IID Technology (ARRA) 1271 84.386A 114295/1011 179,819 169,055 139,220 29,335 Total Title IID Technology Cluster 215,353 36,034 26,951 169,055 166,171 29,835 Reading First 4369 84.357A 092930/8099 886,963 145,830 68,239	21st Century	1371	84.287C	112110/D07043	600,000	-	-	-	536,523	441,565	94,958
Title III Crehnology (ARRA) Total Title III D Technology (Cluster 1271 84.386A 114295/1011 179.819 169.055 139.220 29.835 166.171 29.835 176.171 169.181 169.181 169.835					1,200,000	490,115	82,410	-	536,523	523,975	94,958
Reading First 4369 84.357A 0929300809 886.963 145.830 68.239 - 225.251 293.490 -	Title IID Technology	1260	84.318	104290/0910	36,034	36,034	26,951			26,951	
Reading First 4369 84.357A 0929300809 886,963 145,830 68,239 - 225,251 293,490 - Title III Limited English 1120 84.365A 1005800910 179,196 53,308 7,667 - 182,252 105,703 76,549 Title III Limited English 1160 84.365A 1005700101 112,264 20,991 16,615 - 182,252 105,703 76,549 Title III Limited English 1161 84.365A 1005700101 112,2492 - - 86,950 66,923 20,027 Title III Limited English 1161 84.365A 10570/1011 274,992 - - - 86,950 66,923 20,027 Title III Limited English 1161 84.367 100520/910 2,443,062 1,222,585 177,451 - 60,791 238,242 - - 1,322,040 1,114,688 207,352 - - 1,322,040 1,114,688 207,352 - - 1,322,040 1,114,688	Title IID Technology (ARRA)	1271	84.386A	114295/1011	179,819	-	-	-	169,055	139,220	29,835
Title III Limited English 1120 84,365A 1005800910 179,196 53,308 7,667 - 182,252 105,703 76,549 Title III Limited English 1121 84,365A 1105801011 362,451 182,252 105,703 76,549 Title III Limited English 1160 84,365A 1005700910 111,264 20,891 16,615 - 16,615 - 16,615 - 16,615 Title III Limited English 1161 84,365A 1105701011 274,992 86,950 66,923 20,027 Title III Part A 1090 84,367 1005200910 2,443,062 1,222,585 177,451 - 60,791 238,242 - 20,002 196,908 96,576 Title II Part A 1090 84,367 1005200910 3,601,754 1,322,040 1,114,688 207,352 Title II Part A 1091 84,367 1105201011 3,601,754 1,322,040 1,114,688 207,352 ARRA Education Stabilization Fund 1320 84,394 102525/0910 4,102,636 4,102,636 990,813 990,813 990,813 ARRA Education Stabilization Fund 1321 84,394 112525/1011 1,637,219 1,637,219 1,637,219 1,637,219 1,637,219 1,637,219 2,2638,032 2,691,175 1,686,511 1,004,664 Total passed through Michigan Department of Education Cluster Passed through Ingham Intermediate School District: IDEA Flowthrough A 220 84,027 100455/0910 10,508,957 10,508,957 2,170,947 2,170,947 2,170,947 1,0321,869 8,032,193 2,289,676	Total Title IID Technology Cluster				215,853	36,034	26,951	-	169,055	166,171	29,835
Title III Limited English 1121 84.365A 110580/1011 362.451 - - 182.252 105,703 76,549 Title III Limited English 1160 84.365A 100570/0910 111,264 20,891 16,615 - - 86,950 66,923 20,027 Title III Limited English 1161 84,365A 100570/1011 274,992 - - - 86,950 66,923 20,027 Title II Part A 1090 84,367 100520/0910 2,443,062 1,222,585 177,451 - 60,791 238,242 - Title II Part A 1091 84,367 100520/0910 2,443,062 1,222,585 177,451 - 60,791 238,242 - Title II Part A 1091 84,367 100520/0910 3,601,754 - - 1,332,040 1,114,688 207,352 ARRA Education Stabilization Fund 132 84,394 102525/0910 4,102,636 990,813 - - 1,637,219 - 1,637	Reading First	4369	84.357A	092930/0809	886,963	145,830	68,239		225,251	293,490	
Title III Limited English 1121 84.365A 110580/1011 362.451 - - 182.252 105,703 76,549 Title III Limited English 1160 84.365A 100570/0910 111,264 20,891 16,615 - - 86,950 66,923 20,027 Title III Limited English 1161 84,365A 100570/1011 274,992 - - - 86,950 66,923 20,027 Title II Part A 1090 84,367 100520/0910 2,443,062 1,222,585 177,451 - 60,791 238,242 - Title II Part A 1091 84,367 100520/0910 2,443,062 1,222,585 177,451 - 60,791 238,242 - Title II Part A 1091 84,367 100520/0910 3,601,754 - - 1,332,040 1,114,688 207,352 ARRA Education Stabilization Fund 132 84,394 102525/0910 4,102,636 990,813 - - 1,637,219 - 1,637	Title III Limited English	1120	84.365A	100580/0910	179,196	53,308	7.667	_		7.667	_
Title III Limited English 1160 84.365A 100570/0910 111,264 20,891 16,615 - 16,615 20,027 Title III Limited English 1161 84.365A 110570/1011 274,992 - - - 86,950 66,923 20,027 927,903 74,199 24,282 - 269,202 196,908 96,576 Title II Part A 1090 84,367 100520/0910 2,443,062 1,222,585 177,451 - 60,791 238,242 - Title II Part A 1091 84,367 110520/1011 3,601,754 - - - 1,322,040 1,114,688 207,522 ARRA Education Stabilization Fund 1320 84,394 102525/0910 4,102,636 4,102,636 90,813 - - - 990,813 - ARRA Education Stabilization Fund 1321 84,394 112525/1011 1,637,219 - - - 1,637,219 1,637,219 - - - 1,637,219	<u> </u>	1121			,	-	-	_	182,252	,	76,549
Title II Part A 1090 84.367 100520/0910 2,443,062 1,222,585 177,451 - 60,791 238,242 - 1104 1 Part A 1091 84.367 110520/1011 3,601,754 1,322,040 1,114,688 207,352 1,114,681	Title III Limited English	1160	84.365A	100570/0910	111,264	20,891	16,615	-		16,615	· -
Title II Part A 1090 84.367 100520/0910 2.443,062 1.222,585 177,451 - 60,791 238,242 - 114,688 207,352 1091 Part A 1091 84.367 110520/1011 3.601,754 1,322,040 1.114,688 207,352 6,044,816 1.222,585 177,451 - 1,382,831 1.352,930 207,352 177,451 - 1,382,831 1.352,930 1	Title III Limited English	1161	84.365A	110570/1011	274,992	-	· -	-	86,950	66,923	20,027
Title II Part A					927,903	74,199	24,282		269,202	196,908	96,576
ARRA Education Stabilization Fund 1320 84.394 102525/0910 4,102,636 4,102,636 990,813 990,813 - ARRA Education Stabilization Fund 1321 84.394 112525/1011 1,637,219 1,637,21 1,637,219 1,637,219 1,637,219 1,637,219 1,637,219 1,637,219 1,637,219 1,637,219 1,637,219 1,637,219 1,637,219 1,637,219 1,637,2	Title II Part A	1090	84.367	100520/0910	2,443,062	1,222,585	177,451	-	60,791	238,242	_
ARRA Education Stabilization Fund 1320 84.394 102525/0910 4,102,636 4,102,636 990,813 990,813 - ARRA Education Stabilization Fund 1321 84.394 112525/1011 1,637,219 1,1637,219 1,637,219 1,637,219 - 5,739,855 4,102,636 990,813 - 1,637,219 1,637,219 2,628,032 - Education Jobs Fund 1341 84.410A 112545/1011 2,691,175 2,691,175 1,686,511 1,004,664 Total passed through Michigan Department of Education of Education Cluster Passed through Ingham Intermediate School District: IDEA Flowthrough A 2200 84.027 100455/0910 10,508,957 10,508,957 2,170,947 2,170,947 105,895,606,606 10,508,907 10,321,869 8,032,193 2,289,676	Title II Part A	1091	84.367	110520/1011	3,601,754	- · · · · · -	_	-	1,322,040	1,114,688	207,352
ARRA Education Stabilization Fund 1321 84.394 112525/1011 1,637,219 1,637,219 1,637,219 2,628,032 1,637,219 2,628,032					6,044,816	1,222,585	177,451		1,382,831	1,352,930	207,352
Education Jobs Fund 1341 84.410A 112545/1011 2,691,175 2,691,175 1,686,511 1,004,664 Total passed through Michigan Department of Education Special Education Cluster Passed through Ingham Intermediate School District: IDEA Flowthrough A 2200 84.027 100455/0910 10,508,957 10,508,957 2,170,947 2,170,947 - 10,321,869 8,032,193 2,289,676	ARRA Education Stabilization Fund	1320	84.394	102525/0910	4,102,636	4,102,636	990,813	-	-	990,813	-
Education Jobs Fund 1341 84.410A 112545/1011 2,691,175 2,691,175 1,686,511 1,004,664 Total passed through Michigan Department of Education	ARRA Education Stabilization Fund	1321	84.394	112525/1011	1,637,219	-	-	-	1,637,219	1,637,219	-
Total passed through Michigan Department of Education 45,787,850 15,866,368 3,286,265 - 17,757,074 17,494,421 3,548,918 Special Education Cluster Passed through Ingham Intermediate School District: IDEA Flowthrough A 2200 84.027 100455/0910 10,508,957 10,508,957 2,170,947 2,170,947 - 10EA Flowthrough A 2201 84.027 110450/1011 10,493,659 10,321,869 8,032,193 2,289,676					5,739,855	4,102,636	990,813		1,637,219	2,628,032	
Special Education Cluster 45,787,850 15,866,368 3,286,265 - 17,757,074 17,494,421 3,548,918 Special Education Cluster Passed through Ingham Intermediate School District: IDEA Flowthrough A 2200 84.027 100455/0910 10,508,957 10,508,957 2,170,947 - - - 2,170,947 - IDEA Flowthrough A 2201 84.027 110450/1011 10,493,659 - - - - 10,321,869 8,032,193 2,289,676	Education Jobs Fund	1341	84.410A	112545/1011	2,691,175				2,691,175	1,686,511	1,004,664
Special Education Cluster 45,787,850 15,866,368 3,286,265 - 17,757,074 17,494,421 3,548,918 Special Education Cluster Passed through Ingham Intermediate School District: IDEA Flowthrough A 2200 84.027 100455/0910 10,508,957 10,508,957 2,170,947 - - - 2,170,947 - IDEA Flowthrough A 2201 84.027 110450/1011 10,493,659 - - - - 10,321,869 8,032,193 2,289,676	Total passed through Michigan Department										
Passed through Ingham Intermediate School District: IDEA Flowthrough A 2200 84.027 100455/0910 10,508,957 10,508,957 2,170,947 - - - 2,170,947 - IDEA Flowthrough A 2201 84.027 110450/1011 10,493,659 - - - - 10,321,869 8,032,193 2,289,676					45,787,850	15,866,368	3,286,265		17,757,074	17,494,421	3,548,918
IDEA Flowthrough A 2201 84.027 110450/1011 10,493,659 10,321,869 8,032,193 2,289,676											
<u> </u>	IDEA Flowthrough A	2200	84.027	100455/0910	10,508,957	10,508,957	2,170,947	-	-	2,170,947	-
21,002,616 10,508,957 2,170,947 - 10,321,869 10,203,140 2,289,676	IDEA Flowthrough A	2201	84.027	110450/1011	10,493,659				10,321,869	8,032,193	2,289,676
					21,002,616	10,508,957	2,170,947		10,321,869	10,203,140	2,289,676

Federal grantor/pass-through grantor/program title	District ID <u>Number</u>	Federal CFDA <u>Number</u>	Pass-through Grantor's <u>Number</u>	Approved Award <u>Amount</u>	(Memo only) Prior Year Expenditures	Accrued (Deferred) Revenue 6/30/2010	Adjustments	Current Year <u>Expenditures</u>	Current Year Receipts (Cash Basis)	Accrued (Deferred) Revenue <u>6/30/2011</u>
U.S. Department of Education:										
Passed through Ingham Intermediate School District (continued	l):									
Special Education Cluster (Concluded)										
IDEA Pre-school Development A	2100	84.173A	100460/0910	\$ 164,795	\$ 130,804	\$ 33,991	\$ -		\$ 33,991	\$ -
IDEA Pre-school Development A	2101	84.173A	110460/1011	161,848	-	-	-	161,848	122,946	38,902
IDEA Pre-school Development A	2111	84.173A	100460/0910	20,650				20,650	16,575	4,075
				347,293	130,804	33,991		182,498	173,512	42,977
ARRA IDEA Flowthrough	2220	84.391	100455/0910	1,486,695	973,199	186,514	-		186,514	-
ARRA IDEA Flowthrough	2221	84.391	100455/0910	1,696,725	-	-	-	1,379,995	955,180	424,815
				3,183,420	973,199	186,514		1,379,995	1,141,694	424,815
ARRA IDEA Preschool	2120	84.392	100465/0910	86,667	49,351	4,967	_	-	4,967	_
ARRA IDEA Preschool	2121	84.392	100465/0910	121,728	-	_	-	67,621	33,819	33,802
				208,395	49,351	4,967	-	67,621	38,786	33,802
Total Special Education Cluster				24,741,724	11,662,311	2,396,419		11,951,983	11,557,132	2,791,270
Passed through Central Michigan University										
CMU Science	6500	84.367B	090290-2991	22,000	6,228	2,951	-		2,951	-
CMU Excel	6510	84.367B	100290-9848	14,000	1,589	1,589	-	7,294	7,743	1,140
				36,000	7,817	4,540		7,294	10,694	1,140
Passed through Ferris State University:										
Freedom to Learn	4206	84.318X	064280-5A	14,312	-	(2,967)	-	-	-	(2,967)
Freedom to Learn	4217	84.318X		15,000	-	(1,515)	-	-	-	(1,515)
Freedom to Learn	4226	84.318X		8,647	-	(3,647)	-	-	-	(3,647)
Freedom to Learn	4227	84.318X		1,250		(1,250)				(1,250)
				39,209		(9,379)				(9,379)
Passed through Macomb ISD:										
MIBLSI - Gier Park	1560	84.027A		3,700	2,867	(833)		833		-
MIBLSI - Gier Park	1561	84.027A		1,000				978	1,000	(22)
				4,700	2,867	(833)		1,811	1,000	(22)

Federal grantor/pass-through grantor/program title	District ID <u>Number</u>	Federal CFDA <u>Number</u>	Pass-through Grantor's <u>Number</u>	Approved Award <u>Amount</u>	(Memo only) Prior Year Expenditures	Accrued (Deferred) Revenue 6/30/2010	<u>Adjustments</u>	Current Year <u>Expenditures</u>	Current Year Receipts (Cash Basis)	Accrued (Deferred) Revenue 6/30/2011
U.S. Department of Education: Passed through Clinton County RESA: Voc Ed Special Needs	4070	84.048A		\$ 321,232	\$ 166,570	\$ 42,356			\$ 42,356	\$ -
Voc Ed Special Needs	4071	84.048A		249,936				201,978	136,313	65,665
				571,168	166,570	42,356		201,978	178,669	65,665
Passed through Lansing Community College Technical Preparation	4080	84.243A		3,628	3,628	2,493	- _	<u>-</u> _	2,493	- _
Passed through Western Michigan University WMU Aspiring Leaders	6521	84.363A		15,000				920		920
Passed through Michigan State University MSU Middle School	4190	93.837	R01HL09007505	45,017	43,122	18,630			18,630	
TOTAL U.S. DEPARTMENT OF EDUCATION				80,920,220	31,692,404	6,286,687		31,539,338	31,147,004	6,679,021
U.S. Department of Community and Mental Health: Passed through Eaton ISD										
SPLASH	4050	10.561		\$ 50,567	\$ 29,303	\$ 5,451	\$ -	\$ (56)	\$ 5,395	\$ -
SPLASH	4051	10.561		45,234				27,385	4,745	22,640
				95,801	29,303	5,451		27,329	10,140	22,640
U.S. Department of Labor: WIA Program Cluster Passed through Capital Area Michigan Works:										
WIA Youth	1420	17.259		577,430	574,505	103,045	-	-	103,045	-
WIA Youth	1421	17.259		526,162				526,162	451,618	74,544
				1,103,592	574,505	103,045		526,162	554,663	74,544
U.S. Department of Health & Human Services Passed through Ingham ISD										
Medicaid Outreach Reimbursement		93.778		19,970	275,758	19,970		66,260	86,230	
TOTAL FEDERAL FINANCIAL ASSISTANCE				\$ 93,499,683	\$ 38,250,709	\$ 7,338,733	\$ -	\$ 38,415,651	\$ 38,011,299	\$ 7,743,085

- 1. Basis of presentation The accompanying schedule of expenditures of federal awards includes the grant activity of Lansing School District and is presented on the modified accrual basis of accounting. The information in this schedule is presented in accordance with OMB Circular A-133 and reconciles with the amounts presented in the preparation of the financial statements.
- 2. Title I Cluster, CFDA #84.010 and #84.389, Title II, CFDA #84.367, Title II, Part D Cluster, CFDA #84.318 and #84.386, Education Jobs Fund, CFDA #84.410 and ARRA Stabilization, CFDA #84.394 were audited major programs, representing 42% of expenditures.
- 3. The threshold for distinguishing Type A and Type B programs was \$1,152,470.
- 4. Management has utilized the Grant Section Auditors Report (Form R7120) and the Grant Audit Report in preparing the Schedule of Expenditures of Federal Awards.
- 5. Federal expenditures are reported as revenue in the following funds in the financial statements:

General fund	\$ 32,159,825
Special revenue fund	6,255,826
	\$ 38,415,651

6. Program clusters contained within the schedule are as follows:

Child Nutrition Cluster consists of CFDA #10.553, #10.555 and #10.559

Title I Cluster consists of CFDA #84.010 and #84.389

Special Education Cluster consists of CFDA #84.027, #84.173A, #84.391 and #84.392

Education for homeless children and Youth Cluster consists of CFDA #84.196A and #84.387A

Section I - Summary of Auditors' Results

Financial Statements							
Type of auditors' report issued:	Unqualified						
Material weakness(es) identified:	X	Yes	No				
Significant deficiency(ies) identified?	X	Yes	None reported				
Noncompliance material to financial statements noted?		Yes	X No				
Federal Awards							
Internal control over major programs:							
➤ Material weakness(es) identified:	X	Yes	No				
Significant deficiency(ies) identified?		Yes	X No				
Type of auditors' report issued on compliance for major programs:	Unqua	Unqualified					
Any audit findings disclosed that are required to be reported with Section 510(a) of Circular A-133?	X	Yes	No				
Identification of major programs:							
CFDA Number(s)	Nam	e of Fede	eral Program or Cluster				
84.010 and 84.389 84.367 84.318 and 84.386 84.410 84.394	Title I Cluster Title II Title II, Part D Cluster Education Jobs Fund ARRA Stabilization						
Dollar threshold used to distinguish between type A and type B programs:	\$ 1,	177,174					
Auditee qualified as low-risk auditee?	X	Yes	No				

Section II - Findings - Financial Statement Audit

Finding 2011-1

Finding considered a material weakness

Criteria: There is a significant budget to actual variance at current year-end.

Condition: When final revenues and expenditures were compared to the budget during the audit process, there was a significant variance of approximately \$7,000,000.

Context: Failure to budget properly could result in the Board of Education and management not receiving accurate balances of expected revenues and expenditures. The District is aware of this issue and understands the implications of having significant budget to actual variances.

Effect: Financial decisions could be made based on inaccurate budget information.

Cause: Several reasons were the cause of the larger than expected budget variances. Unusually large unfilled positions, one time federal education jobs fund revenue and other reductions in expenditures greater than expected. Historically, this has not been an issue at the District.

Recommendation: We recommend that the budget process be improved to ensure that all factors affecting the financial status of the District are considered during the budgeting process. We also recommend reviewing year-to-date actual revenues and expenditures and amending the budget based on this information. It is our understanding that all these factors have been considered in the past prior to making final amendments, but due to time constraints, this process was unable to be followed in the current year.

Finding 2011-2

Finding considered a significant deficiency

Criteria: Pupil counts in the Single Record Student Database (SRSD) should be reconciled to the detail pupil rosters to ensure accuracy.

Condition: During the year, Ingham Intermediate School District's pupil membership auditors found significant errors in the reporting of pupil counts while performing their pupil audit.

Context: Failure to properly report student counts to the State of Michigan through the SRSD system could result in the District not receiving the appropriate amount of state aid. The District did correct this issue by year-end and did receive the correct amount of state aid. The independent pupil membership auditor noted some improvements, however numerous errors were still detected.

Effect: Inaccurate amount of state aid could be received by the District.

Cause: Lack of reconciliation process between SRSD and detail pupil rosters and other review of the final pupil membership counts.

Recommendation: Paper membership rosters should be reconciled to the SRSD system in a timely manner prior to submission to the State. In addition, improved oversight should be implemented to ensure this process is completed. Consideration should be given to have the business office review reporting in this area.

Section III - Findings - Federal Awards Audit

Finding 2011-3

Considered a material weakness

Federal Program: All federal programs requiring personnel activity reports

Specific Requirement: Federal timekeeping requirements OMB circular A-87

Criteria: Lansing School District is required to follow specific timekeeping requirements related to employee payroll charged to federal programs. OMB Circular A-87 11h4 states; where employees work on multiple activities or cost objectives, a distribution of their salaries or wages will be supported by personnel activity reports or equivalent documentation which meets the standards in the distribution of salaries and wages to awards must be supported by personnel activity reports (PAR). Reports reflecting the distribution of activity of each employee must be maintained for all staff members whose compensation is charged in whole or in part, directly to awards. Budget estimates or other distribution percentages determined before the services are performed do not qualify as support for charges to Federal awards but may be used for interim accounting purposes, provided that certain conditions are met.

Finding 2011-3 (Concluded)

Condition: We selected 40 individuals for PAR documentation. The results were while PAR reports were prepared they were not prepared for every time period. It was noted during our audit the district only required personal activity reports once a month and not for every pay period required by federal regulations. This was the first year the Michigan Department of Education did not allow lesson plans and other supporting documentation to fulfill this requirement.

Context: The District's compliance staff was aware of the new Personal Activity Report requirements and in fact redesigned the form. Subsequent to our initial review district personnel were able to supply supporting documentation to support the previously undocumented time periods.

Questioned Costs: \$0 – In accordance with the guidance provided by the Kansas City office of Inspector General, the District was able to substantiate federally funded activity with other supporting documentation and therefore able to avoid any questioned costs related to this finding.

Effect: Costs charged to the grants related to split-funded individuals were not documented in accordance with OMB Circular A-87. Because of the violation, the funding sources of the grants could request repayment of some of the grant funds charged for payroll-related charges not adequately documented.

Cause: The District's compliance staff misinterpreted the new requirements. During implementation the District required one pay period to be completed every month and not every pay period.

Recommendation: We recommend Lansing School District establish improved controls for reviewing the federal compliance supplements related to the grants, and verify that adequate timekeeping requirements are monitored and complied with. Personnel Activity Reports should be used weekly to document the actual time spent on each activity by individuals allocating time to more than one activity. These time reports should account for the total number of hours worked by the individual and should be used to allocate the actual costs to the individual activities. These reports should be reviewed and reconciled on a monthly basis. The District should also continue utilizing semi-annual certifications for employees fully charged to a federal program. It is our understanding District personnel are aware of the regulations and have changed procedures to comply with federal regulations in the area of time reporting.

Finding 2011-4

Considered a material weakness

Federal Program: Title I Cluster (CFDA #'s 84.010 and 84.389)

Specific Requirement: Federal timekeeping requirements OMB circular A-87

Criteria: Lansing School District is required to follow specific timekeeping requirements related to employee payroll charged to federal programs. OMB Circular A-87 11h4 states; at least quarterly, comparisons of actual costs to budgeted distributions based on the monthly activity reports are made. Costs charged to Federal awards to reflect adjustments made as a result of the activity actually performed may be recorded annually if the quarterly comparisons show the differences between budgeted and actual costs are less than ten percent; and the budget estimates or other distribution percentages are revised at least quarterly, if necessary, to reflect the changed circumstances.

Condition: We selected 40 individuals for PAR documentation. The results were while PAR reports were prepared they were not consistently compared to the budgeted allocations.

Context: The lack of comparison to the budgeted allocations led to some distribution percentages being allocated to a federal program when they should not have been.

Questioned Costs: \$73,874 - we extrapolated the differences noted during testing of Title I.

Effect: Costs charged to the grants related to split-funded individuals were compared to the personnel activity reports in accordance with OMB Circular A-87. Because of the violation, the funding sources of the grants could request repayment of some of the grant funds charged for payroll-related charges.

Cause: The District's compliance staff did not consistently review the distribution percentages being allocated to the federal programs.

Recommendation: The District's compliance staff should compare PAR documentation to how the employee is being allocated to the grant and notify the accounting staff of any necessary changes, at least quarterly.

LANSING SCHOOL DISTRICT SCHEDULE OF PRIOR YEAR FINDINGS YEAR ENDED JUNE 30, 2011

Section II – Findings – Financial Statement Audit

Finding 2010-1

Finding considered a significant deficiency

Criteria: Pupil counts in the Single Record Student Database (SRSD) should be reconciled to the detail pupil rosters to ensure accuracy.

Condition: During the year, Ingham Intermediate School District's pupil membership auditors found significant errors in the reporting of pupil counts while performing their pupil audit.

Context: Failure to properly report student counts to the State of Michigan through the SRSD system could result in the District not receiving the appropriate amount of state aid. The District did correct this issue by year-end and did receive the correct amount of state aid.

Effect: Inaccurate amount of state aid could be received by the District.

Cause: Lack of reconciliation process between SRSD and detail pupil rosters.

Recommendation: Paper membership rosters should be reconciled to the SRSD system in a timely manner prior to submission to the State. In addition, improved oversight should be implemented to ensure this process is completed. Consideration should be given to have the business office review reporting in this area.

Response: The District is aware of the deficiency and is currently investigating various ways to improve the pupil accounting process.

Status: The lack of reconciliation process between SRSD and detail pupil rosters continues for the year ended June 30, 2011. See finding 2011-2.

LANSING SCHOOL DISTRICT SCHEDULE OF PRIOR YEAR FINDINGS YEAR ENDED JUNE 30, 2011

Section III - Findings - Federal Awards Audit

Finding 2010-2

Finding - Noncompliance

Criteria: The District must spend at least 10% of its Title I budget allocated to the school identified for improvement on professional development.

Condition: The District did not spend 10% of its Title I budget allocated to the school identified for improvement on professional development.

Context: The District is required to follow specific requirements for schools identified for improvement. However, due to the timing of the approval process (the State issued what may be considered final approval the first week in June 2010 with several line item budgets continuing to require modifications); it was not feasible for the building to expend 10% of the budget on professional development during the school year.

Effect: The District is not in compliance with Title I requirements.

Cause: The original budget allocation included a designation of 10% to professional development for the school identified for improvement. Due to MDE required modifications made to the budget throughout the year, the final budget included an allocation of only 6% to professional development, which was not spent in its entirety.

Recommendation: We recommend the District review procedures to ensure the proper budget allocations are maintained for the school identified for improvement.

Response: The District is aware of the deficiency and believes this to be an isolated incident. The District will continuously monitor to assure that the school will maintain the 10% spending for professional development required by Title I.

Status: The District properly allocated at least 10% of its Title I budget to the schools identified for improvement on professional development.



LANSING SCHOOL DISTRICT CORRECTIVE ACTION PLAN FOR THE YEAR ENDING JUNE 30, 2011

U.S. Department of Education:

Lansing School District respectfully submits the following corrective action plan for the year ended June 30, 2011.

Name and address of independent public accounting firm:

Maner Costerisan

2425 East Grand River Avenue, Suite 1

Lansing, Michigan 48912

Audit Period: For the year ended June 30, 2011

The finding from the June 30, 2011 schedule of findings and questioned costs are discussed below. The findings are numbered consistently with the numbers assigned in the schedule.

Finding – Financial statement audit

Finding 2011-1: Considered a material weakness

Recommendation: We recommend that the budget process be improved to ensure that all factors affecting the financial status of the District are considered during the budgeting process. We also recommend reviewing year-to-date actual revenues and expenditures and amending the budget based on this information. It is our understanding that all these factors have been considered in the past prior to making final amendments, but due to time constraints, this process was unable to be followed in the current year.

Action to be taken: We are aware of the material weakness and have evaluated our budgeting processes. We will be taking a more in-depth review of the budget to actual variances while making budget amendments and will be assessing the expected expenditures and revenues on a much more detailed level to ensure that the budgets can be utilized as tools for financial planning and decision-making.

Finding 2011-2: Considered a significant deficiency

Recommendation: Pupil rosters should be reconciled to the SRSD system in a timely manner prior to submission to the State. In addition, improved oversight should be implemented to ensure this process is completed. Consideration should be given to have the business office review reporting in this area.

Action to be taken: We are aware of the deficiency and are currently investigating various ways to improve the pupil accounting process. This will be given much more scrutiny in the current year to ensure all paper counts are also getting reported in the electronic system. The business office will be overseeing reporting in this area for the year ended June 30, 2012.

Finding 2011-3: Considered a material weakness

Recommendation: We recommend Lansing School District establish improved controls and procedures for reviewing the federal compliance supplements related to the grants, and verify that adequate timekeeping requirements are monitored and complied with. Personnel Activity Reports should be used weekly to document the actual time spent on each activity by individuals allocating time to more than one activity. These time reports should account for the total number of hours worked by the individual and should be used to allocate the actual costs to the individual activities. These reports should be reviewed and reconciled on a monthly basis. The District should also continue utilizing semi-annual certifications for employees fully charged to a federal grant.

Action to be taken: The District will review the federal timekeeping requirements to ensure compliance. All of the District's staff whose salaries and fringe benefits are allocated among different grant activities will begin completing personnel activity report to document all activity. The district has changed procedures immediately upon the knowledge of this finding. All required employees now complete personal activity records for every time period. These PAR's are reviewed and approved on a timely basis.

Finding 2011-4: Considered a material weakness

Recommendation: The District's compliance staff should compare PAR documentation to how the employee is being allocated to the grant and notify the accounting staff of any necessary changes, at least quarterly.

Action to be taken: The District will review the federal timekeeping requirements to ensure compliance. The District has changed procedures immediately upon the knowledge of this finding. Any changes between the actual time spent and the amount recorded monthly is communicated to accounting to adjust the general ledger as needed on a quarterly basis. In addition all PAR's are filed in a secure area. These logs are summarized on a monthly basis to calculate the amounts to be charged to each grant.