

2022-2023 Agreed Upon Procedures



CPA Version

The Basics

- The Agreed Upon Procedures encompasses funds private schools received from the Florida Tax Credit (FTC), the Hope Scholarship, Family Empowerment Education Opportunities (FES-EO), and Family Empowerment-Unique Abilities (FES-UA) (*formerly the Gardiner & John McKay Programs*). One of the changes this year was the John McKay program became part of the FES-UA program and the funds are no longer distributed through the DOE. This means no reports will be submitted directly to the DOE.
- The AUP Program was created by the Scholarship Funding Organizations (SFO), Step Up For Students (SUFS) and AAA Scholarship Foundation (AAA), CPAs and input from schools to meet the requirement. The procedures are reviewed and approved by Florida Association of Academic Non-Public School member groups and the Department of Education (DOE). New guidelines are developed every two years.
- The AUP is mandated by Florida Statute (1002.421(1)(q.) The procedures will guide the CPA as they complete the report on behalf of the private school.
- The CPA performing the procedures must be a currently licensed <u>Florida Certified Public Accountant</u> with a firm licensed to perform attestations in the state and must have both an AC & AD license number. The SFO is required to verify licenses & peer reviews prior to accepting any AUP reports.

- The purpose of these procedures is to ensure funds are managed appropriately and to provide proof that scholarship funds are safeguarded and spent on education-related expenditures.
- Private schools receiving \$250,000 or more in <u>combined</u> funds distributed from the SFOs, Step Up For Students (SUFS) and AAA Scholarship Foundation (AAA), during 2022-2023 school year must submit a financial report through their contracted CPA by <u>September 15, 2023</u>.
- The template to complete these procedures will be provided to all CPAs and will be available on our website at <u>https://www.stepupforstudents.org/for-schools-providers/agreed-upon-procedures</u>.
- Currently, there are 3,063 private schools receiving more than \$1.5 billion dollars in combined scholarship funds from the FTC, FES, FES-UA, and Hope scholarship programs for the 2022-23 school year. We estimate over 1,600 of these schools will be required to submit an AUP reports this year.

Important Reminders

All Reports must be submitted by the CPA/Firm, not the school.

All reports to Step Up must be submitted by <u>email</u>. No hardcopies will be accepted.

The report should be a PDF file attached to your email. We cannot open files from a link or secured site.

Remember to put a read receipt on your email when submitting for confirmation.

All reports are due by September 15th 2023.

The Agreed-Upon Procedures is comprised of six sections:

- DOE Compliance (School Eligibility)
- Adequate Accounting System
- Adequate System of Financial Controls
- Adequate Process for Deposit and Classification of Scholarship Funds
- Properly Expended Scholarship Funds for Education-Related Expenses
- Tuition, Operating Term, Attendance Records & Physical Verification

Section I - DOE Compliance

* Include either one and attached to the report

DOE Compliance Letter

State Board of Education	EDUCATION	Richard Corcoran Commissioner of Education
Marva Johnson, Chair Andy Tuck, Vice Chair	-	Commissioner of Education
Members		
Ben Gibson Tom Grady		
Michael Olenick		
Joe York		
RE:		
Dear Private School Admin	istrator:	
The Office of Independent	Education and Parental Choice has received yo	ur compliance paperwork for
the <mark>2019 – 2020</mark> school yea	ar.	
The documentation has be	en reviewed, and the paperwork attests to the	fact that you are maintaining
compliance with the requir	rements governing the state scholarship progra	ms (McKay, Florida Tax Credit,
and/or Gardiner) and s. 10	02.42, Florida Statutes, related to private schoo	ols.
	appreciated, and we look forward to working	
increase the quantity and i	mprove the quality of educational options for I	Florida's students.
Sincerely,		
Q 701		
Laure Mayor	ck-	
- (01		
Laura Mazyck		
Scholarship Director		
Office of Independent Ec	ducation and Parental Choice	

www.fldoe.org 325 W. Gaines Street | Tallahassee, FL 32399-0400 | 850-245-0505

DOE Compliance Sample from the DOE Site

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General Information			
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Lunch Program:			
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Section II - Adequate Accounting System



- A. Enter the name of the accounting systems used by the school.
- B. Enter Yes or No by checking the box. Enter any additional comments if needed in the box below.
- C. Enter NA if student accounts are maintained in accounting software. Enter Yes if reconciled regularly or No if student accounts are not reconciled regularly.

Section III – Adequate System of Financial Controls

SECTION III: Adequate System of Financial Controls A.1 Cash Balances Determine if the scholarship funds are held at a bank or credit union that is insured by the Federal Deposit Insurance Corporation (FDIC) or the National Credit Union Association (NCUA)? If not, this is a Reportable Exception	Yes No - This is a Reportable Exception
SECTION III: cont.	List Months Reviewed:
A.2. Bank Balances Examine three months' statements (including the Fiscal year-end statement, June 2023) for all bank and investment accounts holding Scholarship Funds.	
Determine if the <u>average</u> daily account balance exceeded the FDIC / NCUA limit of \$250,000 during the month's statements being inspected. If the FDIC limit is exceeded, inspect and attach the documentation indicating that the school annually reviews the bank's rating by a reputable ratings provider, which may include, but is not limited to Bauer Financial, Fitch, Moody's, Standard and Poor's; a. If the rating is lower than the top two ratings on the scale, report as a Reportable Exception. b. If the school took no such action to protect the Scholarship Funds, report as a Reportable Exception.	No - FDIC limit was not exceeded Yes - FDIC limit exceeded Rating is in top two of the scale Rating is lower than the top two or school took no action-This is a Reportable Exception * Attach Bank Rating to the report if used
B.1 Bank Reconciliations Using the bank statements previously inspected, are reconciliations of all bank accounts holding scholarship funds completed within 60 days of each month end and are reconciling items resolved prior to the bank's deadline for reporting errors? If not, this is a Material Exception.	Yes No - This is a Material Exception
B.2 Bank Reconciliation Review Are the bank statements independently reviewed by the school's management? If not, this is a Material Exception.	Yes No - This is a Material Exception

- A.1 Verify all accounts holding scholarship funds.
- A.2 List the 2 months plus June 2023 bank statements reviewed.

If FDIC limits were exceeded and bank ratings were used, they should be dated and initialed by management when printed. Attach / include the bank ratings with the report.

- **B.1** Bank statements should be reconciled withing 60 days of the month's end.
- **B.2** A second review by management should be done and documented with a date and initials.

Section III – Adequate System of Financial Controls cont.

C. Non-Education Related Expenses Scan the school's general ledger and identify if non- education related expenses are accounted for separately from the school's education-related expenses. Select a sample of 5 non-education related expenses to review. Are they identified and reported separately from education-related expenses? If not, this is a Material Exception.	NA - There are no Non-Education Related Expenses Yes No - They are not identified or reported separately. This is a Material Exception	
D.1 Shared Expenses Inquire if the school shares expenses (i.e., administrative salaries, facilities costs) with another organization(s) (i.e., affiliated church, day care or other school).	Yes No – Proceed to E. Internal Controls	L
t. D.2 Shared Expenses If costs are shared, scan the general ledger to determine if they are properly allocated and tracked separately. List the organization(s) and expense types shared.	Yes – Include list No - This is a Material Exception NA - There are no shared expenses	C
D.3 Methodology Describe the methodology used to allocate shared expense.		

C. Non-Education Related expenses. (See Appendix for examples)

D.1 If no shared expenses, disregard D.2 & D.3,

- **D.2** List the types of expenses and the organizations they are shared with.
- **D.3** Describe how the school determines allocations including sq. footage, usage, etc.

Section III – Adequate System of Financial Controls cont.



- **E.** If the financial controls are not sufficient, describe the issue(s) in the box below.
- **F.1** The fiscal year begins on July 1st regardless of the school's declared fiscal year. All procedures should encompass the timeframe from July 1, 2022 through June 30, 2023.
- **F.2** The school should document any amendments and the approvals during the fiscal year.
- **F.3** There should be documentation of two budget reviews either in the meeting minutes or by management's dating and initialing the budget in cases were there are no board meetings or members.

Section IV - Funds Received



Scholarship funds are distributed in quarterly payments. Funds distributed by Step Up For Students are issued by ACH transfers.

AAA distributes both paper checks and ACH payments. Both forms of payment require a unique AAA Payment Received Form to be completed by the parent/guardian. The form is supplied by AAA at the time of payment.

Section IV – Deposit & Classification of Scholarship Funds

SECTION IV Adequate Process for Deposit and Classification of Scholarship Funds:	Program S	# of cholarships Amount
A. Scholarship Funds	FTC (ACH) FTC-AAA (Check)	
Document the total number of students participating in each of the Scholarship programs and the total amount of scholarship funds received from each of the Scholarship programs.	FES-EO (ACH)	
	FES-EO-AAA (Check)	
	FES-UA (ACH) (Includes Gardiner & McKay)	
	HOPE (ACH)	
	HOPE -AAA (Check)	
	Total	
ļ		

Payment information and student counts can be obtained from the Remittance Advice/Transmittals each school receives with the payments.

Checks	ACH/ E	lectronic	
<u>AAA</u> FTC FES-EO Hope	<u>SUFS</u> FTC FES-EO FES-UA Hope	AAA FES-UA	



Checks

If the school received scholarship payments by check:

- 1. Obtain the check school's cashing policy and inquire if followed.
- 2. Transfer the total for number of scholarships and amount from Section IV. A.
- 3. Pull a sample of 10 or 5% *(whichever is greater)* including all programs in the sample.
- 4. Confirm the funds are classified in the GL and bank account as tuition & fees. Confirm that funds are posted to each student's tuition account.



ACH/Electronic

If the school received ACH payments:

- 1. Transfer the total for number of scholarships and amount from Section IV. A.
- 2. Pull a sample of 10 or 5% *(whichever is greater)* including all programs in the sample.
- 3. Confirm the funds are classified in the GL and bank account as tuition & fees.
- 4. Confirm the funds were posted to the student's account.
- 5. If any FES-UA from AAA, confirm the Payment Received Form was completed. This is a requirement of AAA.

Section V – Expenses

Before beginning current year's expenses determine if the school had excess funds from the previous year to be accounted for.

If funds were rolled over into the current year, indicate the amount and show in Section V.B box. This amount will be added to their total funds received then measured against the expenses reported to determine if there is excess funds for the current year.

Summarize expense categories. Either enter here or attach to report.

Use the Appendix to guide in determining the Education-related expenses.

SECTION V Education-Related Expenses

A. By scanning the general ledger, identify and prepare a list of <u>all</u> Education-Related Expenses for the entire school by category for the Fiscal Year (July 1 to June 30). Enter or attach a summarized list.

Previous years carried forward funds must be accounted for. Education-Related Expenses paid with previously "carried forward" funds may not be counted as Education-Related Expenses for the current Fiscal Year.

Education-Related Expense categories include but are not limited to school-related personnel expenses, curriculum, classroom technology, building expenses (rent, mortgage interest, property taxes, insurance and maintenance costs associated with the school facilities), administration expenses and classroom instructional resources. See Appendix 2.

B. Funds vs Expenses

Are the school's total education-related expenses greater than the total combined scholarship funds received?

If funds received exceed the total education-related expenses and are not returned, the school must prepare a detailed list of Education-Related Expenses that are (or will be) funded in the subsequent year with the expected date of use. Include the school prepared list with the AUP Report.

If previous year had excess funds, confirm how those funds were spent or are being held. Previous year excess funds must be accounted for.

Total	



C. Expense Sample Using the list developed in V.A. select a sample of Education-Related Expenditures incurred during the Fiscal Year using the table below to determine sample size. Value of Total Education-Related Expenditures Ercen To Sample Size \$ 250,000 \$ 500,000 30 \$ 500,001 \$ 750,000 45 \$ 750,001 \$ 750,001 + 60 * The sample should include capital expenditures, operating expenditures, and pouroll by at least 10% of the number of items selected. Combined Expenses; When multiple schools are managed by a sinale system and cannot be identified separately in the general ledget, a separate sample for each school should be taken based on the total combined education-related expenses.	Sample Size Taken:
C.1-3 Expense Samples	
For each item sampled, scan supporting documentation. Was each expenditure: 1. Education related	Yes
properly authorized in accordance with the policies identified	Yes No - This is a Material Exception
properly classified in the general ledger; and paid timely and accurately from the school's bank account(s)?	Yes
 For this purpose, paid timely means no more than 10% of the sample size was paid greater than 30 days after the due date. For payroll expenditures sampled, re-calculate pay based on corresponding time and attendance, pay rate and deductions records properly authorized in accordance with the policies identified. 	No – This is a Material Exception

Section V – Expenses cont.

Select the correct sample based on the total expenses reported for the school.

Multiple schools mixed in 1 accounting system will require additional samples to be taken.

Verify samples were:

1. Education Related

2. Properly authorized

3. Properly classified in the GL, paid timely and accurately for the bank account.

Section VI – Other Procedures

- A. Total Student Count: Document the total number of students, both scholarship and nonscholarship, at the time of review.
- B. Using a sample, compare the tuition and fees charged between scholarship and non scholarship students.
- C. Using the school's calendar, determine if the operating term is sufficient to meet State Rule 6A.
- D. Confirm if the school has an attendance policy and is maintaining attendance records.



Section VI –Other Procedures cont.



Review the attendance records of sampled students from Section VI. A to determine if they meet the school's Attendance Policy.

Select 10 students (from all programs combined) to verify their physical attendance and the attendance records are properly marked. Physical verification must be done prior to the end of the current school year. It must be done on site. Please call or email if you have any questions.

The 2022-2023 AUP instructions, template, reference materials and samples can be found at our website located at:

https://www.stepupforstudents.org/for-schools-providers/agreed-upon-procedures/ or by emailing us at aup@sufs.org.



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Thank you for taking the time to join us for this presentation.



Please send any questions to AUP@SUFS.ORG