## Management Report

for

Independent School District No. 283 St. Louis Park, Minnesota

June 30, 2019



#### **PRINCIPALS**



Thomas A. Karnowski, CPA Paul A. Radosevich, CPA William J. Lauer, CPA James H. Eichten, CPA Aaron J. Nielsen, CPA Victoria L. Holinka, CPA/CMA Jaclyn M. Huegel, CPA Kalen T. Karnowski, CPA

To the School Board and Management of Independent School District No. 283 St. Louis Park, Minnesota

We have prepared this management report in conjunction with our audit of Independent School District No. 283, St. Louis Park, Minnesota's (the District) financial statements for the year ended June 30, 2019. We have organized this report into the following sections:

- Audit Summary
- Funding Public Education in Minnesota
- Financial Trends of Your District
- Legislative Summary
- Accounting and Auditing Updates

We would be pleased to further discuss any of the information contained in this report or any other concerns that you would like us to address. We would also like to express our thanks for the courtesy and assistance extended to us during the course of our audit.

The purpose of this report is solely to provide those charged with governance of the District, management, and those who have responsibility for oversight of the financial reporting process comments resulting from our audit process and information relevant to school district financing in Minnesota. Accordingly, this report is not suitable for any other purpose.

Malloy, Montague, Karnowski, Radasenich & Co., P. A. Minneapolis, Minnesota

November 20, 2019



#### **AUDIT SUMMARY**

The following is a summary of our audit work, key conclusions, and other information that we consider important or that is required to be communicated to the School Board, administration, or those charged with governance of the District.

OUR RESPONSIBILITY UNDER AUDITING STANDARDS GENERALLY ACCEPTED IN THE UNITED STATES OF AMERICA, GOVERNMENT AUDITING STANDARDS, AND TITLE 2 U.S. CODE OF FEDERAL REGULATIONS PART 200, UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS (UNIFORM GUIDANCE)

We have audited the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of the District as of and for the year ended June 30, 2019. Professional standards require that we provide you with information about our responsibilities under auditing standards generally accepted in the United States of America, *Government Auditing Standards*, and the Uniform Guidance, as well as certain information related to the planned scope and timing of our audit. We have communicated such information to you verbally and in our audit engagement letter. Professional standards also require that we communicate to you the following information related to our audit.

## PLANNED SCOPE AND TIMING OF THE AUDIT

We performed the audit according to the planned scope and timing previously discussed and coordinated in order to obtain sufficient audit evidence and complete an effective audit.

### **AUDIT OPINION AND FINDINGS**

Based on our audit of the District's financial statements for the year ended June 30, 2019:

- We have issued an unmodified opinion on the District's basic financial statements.
- We reported one deficiency in the District's internal control over financial reporting that we considered to be a material weakness.
  - O During the audit of the year ended June 30, 2019 financial statements, the District recorded journal entries as part of the audit process, including prior period adjustments. The prior period adjustments are being reported in fiscal 2019 to adjust capital assets, flexible benefit plan activities, interest receivable, single-employer pension plan, and other post-employment benefits (OPEB) plan balances previously reported. Journal entries made during the audit process were made to keep the financial statements from being misstated by a material amount. Auditing standards consider the identification of a material misstatement that was not initially identified by the District to be a material weakness in the related internal control.
- The results of our testing disclosed no instances of noncompliance required to be reported under *Government Auditing Standards*.
- We reported that the Schedule of Expenditures of Federal Awards is fairly stated, in all material respects, in relation to the basic financial statements.
- The results of our tests indicate that the District has complied, in all material respects, with the
  types of compliance requirements that could have a direct and material effect on each of its major
  federal programs.
- We reported no deficiencies in the District's internal controls over compliance that we considered
  to be material weaknesses with the types of compliance requirements that could have a direct and
  material effect on each of its major federal programs.

- We reported two findings based on our testing of the District's compliance with Minnesota laws and regulations.
  - 1. Minnesota Statutes require prompt payment of local government bills within a standard payment period of 35 days from receipt for governing boards that meet at least once a month. We noted 5 of 25 disbursements we tested were not paid within the statutory timeline.
  - 2. Minnesota Statutes § 270C.66 requires that the District must obtain a certificate by the Commissioner of Revenue that the contractor or subcontractor has complied with the withholding requirements of Minnesota Statutes § 290.92 (either a Commissioner of Revenue Form IC134 or a Contractor's Withholding Affidavit) before making final settlement with any contractor under a contract requiring the employment of employees for wages by said contractor or subcontractors. During fiscal 2019, the District did not obtain the required certificate for two of the two contracts we tested until after the final payment for service had been made to the contractor.

#### EXTRACURRICULAR STUDENT ACTIVITY ACCOUNTS

In accordance with Minnesota Statutes, the District's School Board has elected not to exercise control over the transactions of the extracurricular student activity accounts maintained at various district sites. Consequently, the cash receipts and disbursements of the District's extracurricular student activity accounts are reported in a separate set of financial statements, rather than being reported within the District's General Fund. We have issued an opinion on these separate financial statements, stating that they fairly present the cash balances and cash receipts and disbursements of these accounts as of and for the year ended June 30, 2019, in accordance with the financial reporting provisions of the Minnesota Department of Education (MDE) (regulatory basis of accounting). Our opinion was qualified for a limitation related to the completeness of cash receipts reported.

We reported one deficiency involving internal control over financial reporting for the District's extracurricular student activities that we consider to be a material weakness. The District reports student activities on a cash basis, and has not established procedures to assure that all cash collections are recorded in the accounting records. Procedures such as the use and reconciliation of prenumbered receipts, prenumbered admission tickets for events, and inventory controls over items sold for fundraisers would help strengthen the controls in this area. This finding was reported in the Schedule of Findings and Corrective Action as finding 2019-001.

We also issued a report on compliance with the MDE's *Manual for Activity Fund Accounting* (MAFA), in which we reported the findings listed below as a result of that testing as further detailed in the Schedule of Findings and Corrective Action:

- 2019-002 Receipt Procedures Signatures on Receipts
- 2019-003 Inactive Accounts
- 2019-004 Disbursement Procedures Signatures on Checks
- 2019-005 Untimely Deposits
- 2019-006 Activity Purpose Forms

We recommend the District review the recommendations provided in the separate report on student activities with individuals responsible for overseeing these accounts in order to comply with requirements detailed in the MAFA.

#### OTHER COMMENTS AND RECOMMENDATIONS

### **School Board Approval of Claims**

During our audit, we noted that accounts payable disbursement details are not being included in the board packet for School Board members to review to ensure each claim is appropriate based on state statutes and internal district policies. We recommend an itemized list of monthly claims be included in the board packet for approval in the future.

#### **Accrued Vacation**

The District records accrued vacation time for their employees in excess of allowable amounts in the Districts financial statements. Only a few contracts state that there is a limit to how much vacation an employee can accrue. For the other contracts that do not state a limit for accrued vacation, the contract states "vacation accrued as of June 30 of each year must be used by January 31 of the next contract/fiscal year or it will be forfeited." During our audit, we noted there are multiple employees that have accrued large vacation balances that are potentially in excess of limits provided in the District's policies and employment contracts. We recommend the District review these balances for each individual to determine if balances are being accounted for consistently with the District's policies and terms of employment contracts.

#### FOLLOW-UP ON PRIOR YEAR FINDINGS AND RECOMMENDATIONS

As a part of our audit of the District's financial statements for the year ended June 30, 2019, we performed procedures to follow-up on any findings and recommendations that resulted from the prior year audit. We reported the following findings that were corrected by the District in the current year:

- 2018-002 Internal Control Over Eligibility Compliance Control Finding Significant Deficiency
  - An application in which the final determination of free, reduced, or paid meals was incorrect.
- 2018-003 Internal Control Over Reporting Compliance Control Finding Material Weakness

The District did not have controls in place to ensure the claim for reimbursement matched the District's records for meals served.

#### SIGNIFICANT ACCOUNTING POLICIES

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by the District are described in Note 1 of the notes to basic financial statements.

No new accounting policies were adopted and the application of existing policies was not changed during the fiscal year ended June 30, 2019. However, the District implemented the following governmental accounting standard during the fiscal year ended June 30, 2019:

• Governmental Accounting Standards Board (GASB) Statement No. 88, Certain Disclosures Related to Debt, Including Direct Borrowings and Direct Placements, which improved the information disclosed in notes to government financial statements related to debt, including direct borrowings and direct placements. It also clarified which liabilities governments should include when disclosing information related to debt.

We noted no transactions entered into by the District during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the financial statements in the proper period.

#### ACCOUNTING ESTIMATES AND MANAGEMENT JUDGMENTS

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimates affecting the financial statements were:

General education revenue and certain other revenues are computed by applying an allowance per student to the number of students served by the District. Student attendance is accumulated in a state-wide database—MARSS. Because of the complexity of student accounting and because of certain enrollment options, student information is input by other school districts and the MARSS data for the current fiscal year is not finalized until after the District has closed its financial records. General education revenue and certain other revenues are computed using preliminary information on the number of students served in the resident district and also utilizing some estimates, particularly in the area of enrollment options.

Special education state aid includes an adjustment related to tuition billings to and from other school districts for special education services, which are computed using formulas derived by the MDE. Because of the timing of the calculations, this adjustment for the current fiscal year is not finalized until after the District has closed its financial records. The impact of this adjustment on the receivable and revenue recorded for state special education aid is calculated using preliminary information available to the District.

The District has recorded a liability in the Statement of Net Position for severance benefits payable for which it is probable employees will be compensated. The "vesting method" used by the District to calculate this liability is based on assumptions involving the probability of employees becoming eligible to receive the benefits (vesting), the potential use of accumulated sick leave prior to termination, and the age at which such employees are likely to retire.

The District has recorded activity for OPEB and pension benefits. These obligations are calculated using actuarial methodologies primarily described in GASB Statement Nos. 68, 73, and 75. These actuarial calculations include significant assumptions, including projected changes, healthcare insurance costs, investment returns, retirement ages, proportionate share, and employee turnover.

The depreciation of capital assets involves estimates pertaining to useful lives.

The District's self-insured activities require recording a liability for claims incurred, but not yet reported, which are based on estimates.

We evaluated the key factors and assumptions used by management to develop the estimates discussed above in determining that they are reasonable in relation to the financial statements taken as a whole.

Certain financial statement disclosures are particularly sensitive because of their significance to financial statement users. The disclosures included in the notes to the basic financial statements related to OPEB and pension benefits are particularly sensitive due to the materiality of the liabilities, and the large and complex estimates involved in determining the disclosures.

The financial statement disclosures are neutral, consistent, and clear.

### DIFFICULTIES ENCOUNTERED IN PERFORMING THE AUDIT

We encountered no significant difficulties in dealing with management in performing and completing our audit.

### CORRECTED AND UNCORRECTED MISSTATEMENTS

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. There were no misstatements detected as a result of audit procedures that were material, either individually or in the aggregate, to each opinion unit's financial statements taken as a whole.

#### **DISAGREEMENTS WITH MANAGEMENT**

For purposes of this letter, a disagreement with management is a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditor's report. We are pleased to report that no such disagreements arose during the course of our audit.

#### MANAGEMENT REPRESENTATIONS

We have requested certain representations from management that are included in the management representation letter dated November 20, 2019.

#### MANAGEMENT CONSULTATIONS WITH OTHER INDEPENDENT ACCOUNTANTS

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the District's financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

### OTHER AUDIT FINDINGS OR ISSUES

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the District's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

#### **OTHER MATTERS**

We applied certain limited procedures to the management's discussion and analysis and the pension and OPEB-related required supplementary information (RSI) that supplement the basic financial statements. Our procedures consisted of inquiries of management regarding the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We did not audit the RSI and do not express an opinion or provide any assurance on the RSI.

We were engaged to report on the supplemental information, which accompanies the financial statements, and the separately issued Schedule of Expenditures of Federal Awards and the Uniform Financial Accounting and Reporting Standards (UFARS) Compliance Table, but are not RSI. With respect to this supplementary information, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with accounting principles generally accepted in the United States of America, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

We were not engaged to report on the introductory section, which accompanies the financial statements but is not RSI. Such information has not been subjected to the auditing procedures applied in the audit of the basic financial statements and, accordingly, we do not express an opinion or provide any assurance on it.



#### FUNDING PUBLIC EDUCATION IN MINNESOTA

Due to its complexity, it would be impossible to fully explain the funding of public education in Minnesota within this report. A summary of legislative changes affecting school districts included later in this report gives an indication of how complicated the funding system is. This section provides some state-wide funding and financial trend information.

## **BASIC GENERAL EDUCATION REVENUE**

The largest single funding source for Minnesota school districts is basic general education aid. Each year, the Legislature sets a basic formula allowance. Total basic general education revenue is calculated by multiplying the formula allowance by the number of pupil units for which a district is entitled to aid. Pupil units are calculated using a legislatively determined weighting system applied to average daily membership (ADM). Over the years, various modifications have been made to this calculation, including changes in weighting and special consideration for declining enrollment districts.

The table below presents a summary of the formula allowance for the past decade and as approved for the next two fiscal years. The amount of the formula allowance and the percentage change from year-to-year excludes temporary funding changes, the "roll-in" of aids that were previously funded separately, and changes that may vary dependent on actions taken by individual districts. The \$529 increase in 2015 was offset by changes to pupil weightings and the general education aid formula that resulted in an increase equivalent to approximately \$105, or 2.0 percent, state-wide.

		Formula Allowance				
Fiscal Year			Percent			
Ended June 30,	A	mount	Increase			
2010	\$	5,124	- %			
2010	\$ \$	5,124	- % - %			
2011		,				
	\$	5,174	1.0 %			
2013	\$	5,224	1.0 %			
2014	\$	5,302	1.5 %			
2015	\$	5,831	2.0 %			
2016	\$	5,948	2.0 %			
2017	\$	6,067	2.0 %			
2018	\$	6,188	2.0 %			
2019	\$	6,312	2.0 %			
2020	\$	6,438	2.0 %			
2021	\$	6,567	2.0 %			

#### STATE-WIDE SCHOOL DISTRICT FINANCIAL HEALTH

One of the most common and comparable statistics used to evaluate school district financial health is the unrestricted operating fund balance as a percentage of operating expenditures.

30% 28% 26% 24% 22% 20% 18% 16% 14% 12% 10% 8% 6% 4% 2% 2010 2012 2013 2014 2015 2019 2011 2016 2017 2018 □ State-Wide 17.7% 20.8% 22.9% 22.1% 21.2% 20.6% 20.7% 20.3% 20.0% ■ISD No. 283 11.7% 6.7% 17.8% 19.2% 23.4% 25.3% 28.1% 27.6% 26.2% 25.9%

State-Wide Unrestricted Operating Fund Balance as a Percentage of Operating Expenditures

Note: State-wide information is not available for fiscal 2019.

The calculation above reflects only the unrestricted fund balance of the General Fund, and the corresponding expenditures, which is the same method the state uses for the calculation of statutory operating debt. We have also included the comparable percentages for your district.

During the economic downturn that began in 2008, the average unrestricted fund balance as a percentage of operating expenditures maintained by Minnesota school districts increased, peaking at 22.9 percent at the end of fiscal 2012. This trend reflected districts' efforts to limit budget cuts, retain educational programs, and maintain adequate operating cash flow during a period of uncertain funding. As the state's economic condition improved in subsequent years, this ratio has gradually decreased to 20.0 percent at the end of fiscal 2018.

The District's unrestricted operating fund balance as a percentage of operating expenditures was 25.9 percent at the end of the current year, as compared to 26.2 percent at June 30, 2018.

The table below shows a comparison of governmental fund revenue per ADM received by Minnesota school districts and your district. Revenues for all governmental funds are included, except for the Capital Projects – Building Construction and Post-Employment Benefits Debt Service Funds. Other financing sources, such as proceeds from sales of capital assets, insurance recoveries, bond sales, loans, and interfund transfers, are also excluded.

Governmental Funds Revenue per Student (ADM) Served							
State-Wide Metro Area			ISD No. 283 – St. Louis Park				
2017	2018	2017	2018	2017	2018	2019	
\$ 1,933	\$ 2,024	\$ 2,516	\$ 2,638	\$ 3,578	\$ 3,853	\$ 4,483	
515	520	423	433	428	420	496	
9,386	9,614	9,387	9,625	8,809	9,015	9,232	
450	450	480	474	517	468	483	
12,284	12,608	12,806	13,170	13,332	13,756	14,694	
561	559	557	554	425	443	449	
628	642	733	752	1,529	1,492	1,654	
1,119	1,128	1,118	1,120	1,373	1,308	2,113	
\$ 14,592	\$ 14,937	\$ 15,214	\$ 15,596	\$ 16,659	\$ 16,999	\$ 18,910	
ol District Prof	iles Report (c	urrent vear e	stimated)	4 710	4,709	4,662	
	State- 2017  \$ 1,933 515 9,386 450 12,284  561 628 1,119 \$ 14,592	State-Wide         2017       2018         \$ 1,933       \$ 2,024         515       520         9,386       9,614         450       450         12,284       12,608         561       559         628       642         1,119       1,128         \$ 14,592       \$ 14,937	State-Wide       Metro         2017       2018         \$ 1,933       \$ 2,024         515       520         9,386       9,614         450       450         12,284       12,608         561       559         628       642         1,119       1,128         \$ 14,592       \$ 14,937         \$ 15,214	State-Wide         Metro Area           2017         2018           \$ 1,933         \$ 2,024           \$ 515         \$ 520           \$ 423         433           \$ 9,386         9,614           \$ 450         450           \$ 450         480           \$ 12,284         12,608           \$ 557         554           \$ 628         642           \$ 1,119         1,128           \$ 1,118         1,120           \$ 14,592         \$ 14,937           \$ 15,214         \$ 15,596	State-Wide         Metro Area         ISD No.           2017         2018         2017         2018         2017           \$ 1,933         \$ 2,024         \$ 2,516         \$ 2,638         \$ 3,578           515         520         423         433         428           9,386         9,614         9,387         9,625         8,809           450         450         480         474         517           12,284         12,608         12,806         13,170         13,332           561         559         557         554         425           628         642         733         752         1,529           1,119         1,128         1,118         1,120         1,373	State-Wide         Metro Area         ISD No. 283 – St. Location           2017         2018         2017         2018           \$ 1,933         \$ 2,024         \$ 2,516         \$ 2,638         \$ 3,578         \$ 3,853           \$ 515         \$ 520         423         433         428         420           9,386         9,614         9,387         9,625         8,809         9,015           450         450         480         474         517         468           12,284         12,608         12,806         13,170         13,332         13,756           561         559         557         554         425         443           628         642         733         752         1,529         1,492           1,119         1,128         1,118         1,120         1,373         1,308           \$ 14,592         \$ 14,937         \$ 15,214         \$ 15,596         \$ 16,659         \$ 16,999	

Note: Excludes the Capital Projects - Building Construction and Post-Employment Benefits Debt Service Funds.

Source of state-wide and metro area data: School District Profiles Report published by the MDE

ADM used in the table above is based on enrollments consistent with those used in the MDE School District Profiles Report, which include extended time ADM, and may differ from ADM reported in other tables.

The mix of local and state revenues vary from year to year primarily based on funding formulas and the state's financial condition. The mix of revenue components from district to district varies, due to factors such as the strength of property values, mix of property types, operating and bond referendums, enrollment trends, density of population, types of programs offered, and countless other criteria.

Changes in enrollment also impact comparisons in the table above and on the next page when revenue and expenditures are based on fixed costs, such as debt levies and principal and interest on outstanding indebtedness.

The District earned approximately \$88 million in the governmental funds reflected above in fiscal 2019, an increase of approximately \$8 million (10.1 percent) from the prior year. Total revenue per ADM served increased by \$1,911 per student. General Fund property tax revenue increased \$630 per student, due to an increase in taxes levied for the General Fund (mainly operating referendum and long-term facilities maintenance levy). General Fund state aid revenues were \$217 per student higher than last year, mainly due to the per pupil unit increase in the general education formula allowance. Revenue from General Fund federal sources was \$15 per pupil more than last year. Revenues for debt service increased \$805 per student, as the District's levy increased from the bond referendum passed in calendar 2017.

The following table reflects similar comparative data available from the MDE for all governmental fund expenditures, excluding the Capital Projects – Building Construction and Post-Employment Benefits Debt Service Funds. Other financing uses, such as bond refundings and transfers, are also excluded.

Governm	ental Funds	Expenditur	es per Stude	ent (ADM) S	Served		
	State-Wide		Metro Area		ISD No. 283 – St. Louis Park		
	2017	2018	2017	2018	2017	2018	2019
General Fund							
Administration and district support	\$ 991	\$ 1,031	\$ 996	\$ 1,045	\$ 1,033	\$ 1,334	\$ 1,336
Elementary and secondary							
regular instruction	5,539	5,646	5,887	5,976	6,310	6,308	6,741
Career and technical instruction	166	170	153	154	95	109	124
Special education instruction	2,225	2,298	2,334	2,418	2,264	2,252	2,340
Instructional support services	660	658	765	748	1,008	985	940
Pupil support services	1,074	1,118	1,165	1,209	1,053	1,083	1,196
Sites, buildings, and other	906	936	870	896	1,239	1,227	1,457
Total General Fund – noncapital	11,561	11,857	12,170	12,446	13,002	13,298	14,134
General Fund capital expenditures	627	658	592	636	412	576	252
Total General Fund	12,188	12,515	12,762	13,082	13,414	13,874	14,386
Special revenue funds							
Food Service	550	553	545	545	423	432	419
Community Service	611	640	713	750	1,521	1,562	1,649
Debt Service Fund	1,359	1,308	1,323	1,230	2,315	1,275	2,062
Total expenditures	\$ 14,708	\$ 15,016	\$ 15,343	\$15,607	\$17,673	\$17,143	\$ 18,516
ADM served per MDE School District F	Profiles Repo	ort (current ve	ear estimated	)	4,710	4,709	4,662

Note: Excludes the Capital Projects - Building Construction and Post-Employment Benefits Debt Service Funds.

Source of state-wide and metro area data: School District Profiles Report published by the MDE

Expenditure patterns also vary from district to district for various reasons. Factors affecting the comparison include the growth cycle or maturity of the District, average employee experience, availability of funding, population density, and even methods of allocating costs.

The District's expenditures per ADM have been above the metro area average in recent years, mainly in Debt Service Fund.

The District spent \$86,324,619 million in the governmental funds reflected above in fiscal 2019, an increase of \$5,606,832 million (7.0 percent) from the prior year. On a per student basis, this represents an increase of \$1,373. General Fund operating expenditures (excluding capital) increased \$836 per student, mainly in elementary and secondary regular instruction (\$433 per pupil) and sites, buildings, and other (\$230 per pupil). General Fund capital expenditures decreased \$324 per pupil. Debt Service Fund expenditures also increased \$787 per pupil, mainly due to increased payments from the bonds issued related to the referendum passed in calendar 2017.

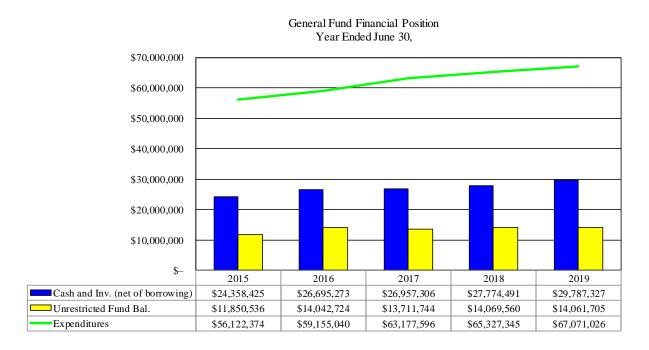
#### **SUMMARY**

Funding for Minnesota school districts generally has not kept pace with inflation and an increasing need for services, despite recent enhancements to the basic general education state aid formula and other categorical aids. This has often increased districts reliance on local revenue sources like voter-approved operating referenda and user fees to maintain programs. Many districts are also beginning to experience delays in collecting property tax revenues due to higher abatements, as more commercial property taxpayers are appealing the assessed values of brick-and-mortar facilities, due to rapid expansion of e-commerce. School boards and district administrators continue to face many challenges in providing the best education within the limits of the resources available.

### FINANCIAL TRENDS OF YOUR DISTRICT

### GENERAL FUND FINANCIAL POSITION

The following graph displays the District's General Fund trends of financial position and changes in the volume of financial activity. Unrestricted fund balance and cash balance are two indicators of financial health, while annual expenditures are often used to measure the size of the operation.



The District ended fiscal year 2019 with a General Fund cash balance of \$29,787,327 (net of borrowing and interfund receivables and payables), an increase of \$2,012,836 from the previous year. Unrestricted fund balance (consisting of any committed, assigned, or unassigned fund balances) at year-end totaled \$14,061,705, an increase of \$879,034.

The following table presents the components of the General Fund balance for the past five years:

	June 30,					
	2015	2016	2017	2018	2019	
Nonspendable fund balances Restricted fund balances (1) Unrestricted fund balances	\$ 224,189 5,542,970	\$ 178,420 4,850,662	\$ 249,200 4,727,208	\$ 203,888 4,636,922	\$ 160,802 5,979,060	
Assigned Unassigned	3,620,267 8,230,269	6,271,813 7,770,911	6,268,705 7,443,039	3,489,241 10,580,319	3,422,803 10,638,902	
Total fund balance	\$ 17,617,695	\$ 19,071,806	\$ 18,688,152	\$ 18,910,370	\$ 20,201,567	
Unrestricted fund balances as a percentage of expenditures	21.1%	23.7%	21.7%	21.5%	21.0%	
Unassigned fund balances as a percentage of expenditures	14.7%	13.1%	11.8%	16.2%	15.9%	

<sup>(1)</sup> Includes deficits in restricted fund balance accounts allowed to accumulate deficits under UFARS, which are part of unassigned fund balance on the accounting principles generally accepted in the United States of America-based financial statements.

The table above reflects the total General Fund unrestricted fund balance and percentages, which differs from those used in the previous discussion of state-wide fund balances, which are based on a state formula. The resources represented by this fund balance are critical to a district's ability to maintain adequate cash flow throughout the year, to retain its programs, and to cushion against the impact of unexpected costs or funding shortfalls.

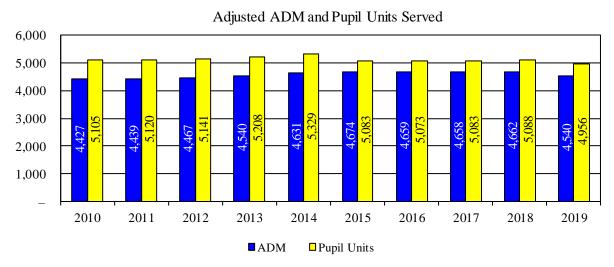
At June 30, 2019, unrestricted fund balances in the General Fund represented 21.0 percent of annual expenditures, or over 10 weeks of operations assuming level spending throughout the year.

The School Board has a formally adopted a fund balance policy that establishes a desired unassigned General Fund balance. The policy states the District establishes a year-end minimum unassigned fund balance of 6.0 percent of subsequent year's General Fund expenditures.

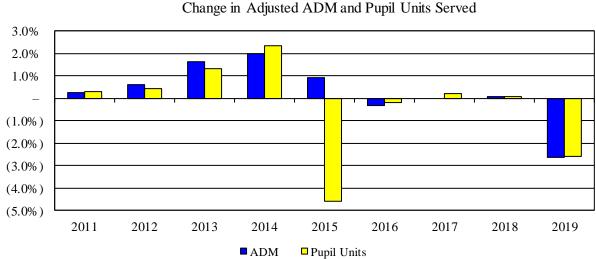
At June 30, 2019, the unassigned fund balance of the General Fund was 18.3 percent based on an unassigned fund balance of \$10,638,902, total General Fund expenditures of \$67,071,026, plus transfers out of \$329,985, less expenditures for restricted categories, including Alternative Teacher Professional Pay System, operating capital, long-term facilities maintenance, capital projects, basic skills, staff development, and capital leases totaling \$9,306,618, leaving net expenditures for purposes of this calculation of \$58,094,393.

#### AVERAGE DAILY MEMBERSHIP AND PUPIL UNITS

The following graph presents the District's adjusted ADM and pupil units served for the past 10 years:



The following graph shows the rate of change in ADM served by the District from year-to-year, along with the change in the resulting pupil units:



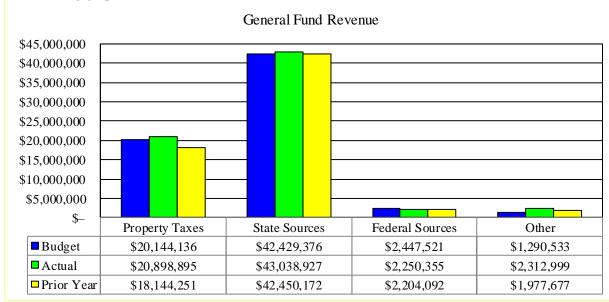
The change in pupil units for 2015 includes the effect of legislative reductions to pupil units.

ADM is a measure of students attending class, which is then converted to pupil units (the base for determining revenue) using a statutory formula. Not only is the original budget based on ADM estimates, the final audited financial statements are based on updated, but still estimated, ADM since the counts are not finalized until around January of the following year. When viewing revenue budget variances, one needs to consider these ADM changes, the impact of the prior year final adjustments which affect this year's revenue, and also the final adjustments caused by open enrollment gains and losses.

The District served an estimated adjusted ADM of 4,540 in 2019, a decrease of 122 from the previous year. The number of pupil units served by the District for fiscal 2019 was 4,956, a decrease of 132 (2.6 percent) from the prior year.

#### **GENERAL FUND REVENUES**

The following graph summarizes the District's General Fund revenue for 2019:



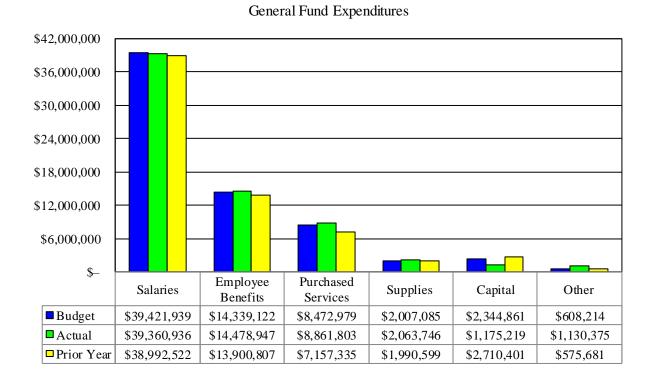
Total General Fund revenues were \$68,501,176 for the year ended June 30, 2019, which was \$2,189,610 (3.3 percent) over the final budget. Property tax revenue was over budget by \$754,759, due to the fiscal 2019 recognition of property tax revenue that had been deferred in previous fiscal years. State revenues were over budget by \$609,551. The majority of this variance is due to increases in special education state aid resulting from reduced proration of the state-wide funding.

Revenues from other local sources (including gifts, bequests, tuition, rental, and investment income) were \$1,022,466 over budget. Investment earnings exceeded the budget by about \$375,000, due to conservative budgeting. Local revenue exceeded the budget by around \$380,000, due to conservative budgeting for fees and admissions and due to a one-time refund, resulting from the dissolution of West Metro Education Program for about \$230,000. Also, rentals and gifts exceeded the budget by nearly \$200,000, due to conservative budgeting in these areas.

General Fund total revenues were \$3,724,984 higher than the previous year. Property tax revenue was higher than last year by \$2,754,644, mainly due to the increased levy, in the referendum and long-term facilities maintenance categories.

#### GENERAL FUND EXPENDITURES

The following graph presents the District's General Fund expenditures for 2019:



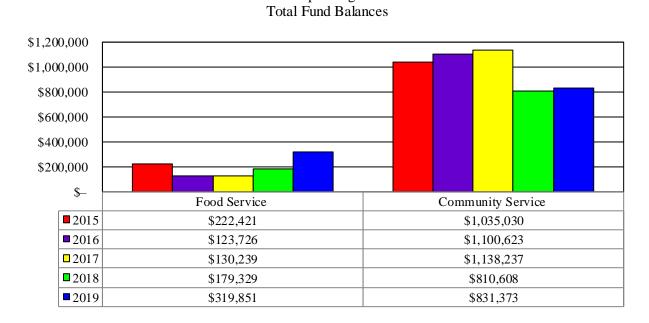
Total General Fund expenditures were \$67,071,026 for the year ended June 30, 2019, which was \$123,174 (0.2 percent) under the final budget. Salaries were \$61,003 under budget, with the variance spread across a number of programs. Capital expenditures were \$1,169,642 under budget, mainly for projects budgeted for in the current year that will be carried forward to future years. This was offset by expenditures in excess of budgeted amounts in purchased services (\$388,824), mostly for special education, and other (\$522,161), mainly in the sites and buildings category.

Total General Fund expenditures were \$1,743,681 (2.7 percent) more than the prior year. The largest increase was in purchased services, which were \$1,704,468 higher than the previous year, mainly for elementary and secondary regular instruction and sites and buildings. Capital expenditures were \$1,535,182 lower than last year, mainly for sites and buildings.

#### OTHER FUNDS OF THE DISTRICT

The following graph shows what is referred to as the other operating funds. The remaining nonoperating funds are only included in narrative form below, since their level of fund balance can fluctuate significantly, due to such things as issuing and spending the proceeds of refunding or building bonds and, therefore, the trend of fund balance levels is not necessarily a key indicator of financial health. It does not mean that these funds cannot experience financial trouble or that their fund balances are unimportant.

Other Operating Funds



## **Food Service Special Revenue Fund**

The District's Food Service Special Revenue Fund ended fiscal 2019 with a fund balance increase of \$140,522, compared to a budgeted decrease of \$190. Food service revenue was \$2,092,915, which was over budget by \$112,457, mainly in meal sales revenue. Expenditures were \$1,952,393, and under budget by \$28,255, mainly in purchased services. The ending fund balance of \$319,851 in this fund represents 16.4 percent of current year expenditures.

## **Community Service Special Revenue Fund**

The District's Community Service Special Revenue Fund ended fiscal 2019 with a fund balance increase of \$20,765, compared to a budgeted increase of \$10,238. Revenues were \$7,710,450, which exceeded budget by \$309,074, mainly in program fees. Expenditures were \$7,689,685, and over budget by \$298,547, mainly in salaries and benefits. The ending fund balance of \$831,373 in this fund represents 10.8 percent of current year expenditures.

Over the years, we have emphasized to our clients that food service and community service operations should be self-sustaining, and should not become an additional burden on general education funds. The District has been able to maintain healthy, stable fund balances in both funds.

## **Capital Projects – Building Construction Fund**

The Capital Projects – Building Construction Fund ended the year with a fund balance decrease of \$28,602,757, as the District spends down bond proceeds from the 2018 school building bonds issued in 2018. At June 30, 2019, the fund balance is \$67,631,248, restricted for capital projects.

### **Debt Service Fund**

The District's Debt Service Fund ended fiscal 2019 with a fund balance increase of \$246,229, compared to a budgeted increase of \$261,064. Revenues were \$10,653,231, which was less than budget by \$17,261. Expenditures were \$10,407,002, and under budget by \$2,426. The funding of debt service is controlled in accordance with each outstanding debt issue's financing plan.

### **Internal Service Funds**

Internal service funds are used to account for the financing of goods and services provided by one department or agency of a government to other departments or agencies on a cost-reimbursement basis. The District currently maintains two internal service funds. These funds are used to account for the District's self-insured dental insurance and OPEB revocable trust functions.

- a) **Dental Self-Insurance** The District started a Dental Self-Insurance Fund in the current year. This fund was funded by a transfer of assigned fund balances from the General Fund that had been set aside in prior years for this purpose. Revenues for fiscal 2019 totaled \$535,083, while expenses totaled \$636,990. The net position as of June 30, 2019 was \$228,078, which represents 35.8 percent of annual operating expenses of this fund.
- **b) OPEB Trust Fund** Revenues for fiscal 2019 totaled \$398,420, while expenses totaled \$427,661. After a prior period adjustment of \$228,019, the net position (deficit) as of June 30, 2019 was (\$2,521,986).

#### GOVERNMENT-WIDE FINANCIAL STATEMENTS

The District's financial statements include fund-based information that focuses on budgetary compliance, and the sufficiency of the District's current assets to finance its current liabilities. The governmental reporting model also requires the inclusion of two government-wide financial statements designed to present a clear picture of the District as a single, unified entity. These government-wide financial statements provide information on the total cost of delivering educational services, including capital assets and long-term liabilities.

Theoretically, net position represents district resources available for providing services after its debts are settled. However, those resources are not always in expendable form, or there may be restrictions on how some of those resources can be used. Therefore, this statement divides net position into three components: net investment in capital assets, restricted, and unrestricted. The following table presents a summarized reconciliation of the District's governmental fund balances to net position, and the separate components of net position for the last two years:

	Jun		
	2019	2018	Change
Net position – governmental activities			
Total fund balances – governmental funds	\$ 90,776,346	\$ 117,269,774	\$ (26,493,428)
Total capital assets, net of depreciation	92,239,885	66,274,961	25,964,924
Bonds and leases, net of premiums	(125,457,815)	(132,415,536)	6,957,721
Pensions, net of deferred outflows and inflows	(63,183,306)	(77,464,509)	14,281,203
Other adjustments	(7,691,273)	(8,078,236)	386,963
Total net position – governmental activities	\$(13,316,163)	\$ (34,413,546)	\$ 21,097,383
Net position			
Net investment in capital assets	\$ 35,130,733	\$ 33,279,920	\$ 1,850,813
Restricted	7,230,620	6,615,424	615,196
Unrestricted	(55,677,516)	(74,308,890)	18,631,374
Total net position	\$(13,316,163)	\$ (34,413,546)	\$ 21,097,383

Some of the District's fund balances translate into restricted net position by virtue of external restrictions (statutory restrictions) or by the nature of the fund they are in (e.g. Food Service Special Revenue Fund balance can only be spent for food service program costs). The unrestricted net position category consists mainly of the General Fund unrestricted fund balances, offset against noncapital long-term obligations, such as vacation payable, severance payable, net pension, and net OPEB liabilities.

Total net position increased \$21,097,383 in fiscal 2019. The change in the District's proportionate share of the Public Employees Retirement Association and the Teachers Retirement Association state-wide pension liabilities and related deferments was the primary cause of the \$18,631,374 increase in unrestricted net position.

The District's net investment in capital assets increased \$1,850,813. This change generally relates to the relationship between the rate capital assets are being added and depreciated, and the rate at which the District is repaying the debt issued to purchase or construct those assets. The increase in the current year was also impacted by capital additions financed with available resources and capital-related levies, which do not result in additional capital-related debt.

Restricted net position increased \$615,196, mainly in the restricted for long-term facilities maintenance program.

#### LEGISLATIVE SUMMARY

The 2019 Legislature passed education and tax bills that included appropriation increases of between \$563 million and \$593 million for K–12 education over the fiscal year (FY) 2020–2021 biennium, with the majority of the additional appropriations being added to the general education and special education funding formulas. The following is a brief summary of specific legislative changes from the 2019 session or previous legislative sessions impacting Minnesota school districts in future years.

General Education Revenue – The Legislature approved annual increases of 2 percent to the basic general education formula allowance for the FY 2020–2021 biennium. The per pupil allowance will increase \$126 to \$6,438 for FY 2020, and another \$129 to \$6,567 for FY 2021. Other small additions to general education funding were approved to: provide permanent funding for early middle college programs serving students under the age of 22; extend the opportunity to participate in post-secondary enrollment options – career and technical education programs to nonpublic students in the 10th grade; and provide transportation for pregnant teens and teen moms attending established programs that provide parent training and quality on-site child care.

**Compensatory Revenue** – The portion of compensatory revenue required to be used for extended time activities increased from 1.7 percent of total compensatory revenue for FY 2018 to 3.5 percent in FY 2019, and will increase to 3.5 percent plus the annual percentage change in the basic general education thereafter.

**Early Learning** – The Legislature appropriated funding to maintain the 4,000 Voluntary Pre-Kindergarten (VPK) and School Readiness Plus program seats currently set to expire after FY 2019, through FY 2020 and FY 2021. Students in these programs will not be used in declining enrollment revenue calculations for FY 2022, and will not be used to drive FY 2022 compensatory revenue for sites where VPK funding is discontinued after FY 2021, due to the reduction in the number of funded seats.

**Special Education Revenue** – The 2019 education bill included a number of enhancements to special education funding designed to hold the state average cross subsidy per pupil constant at the FY 2019 level of \$820 per average daily membership (ADM) for FY 2020 and FY 2021. The changes included:

- Establishing a new component of the state special education funding formula, known as cross subsidy reduction aid, beginning in FY 2020. Cross subsidy reduction aid will equal a percentage of each district's "initial cross subsidy" for the prior fiscal year, with the percentages set at 2.60 percent for FY 2020 and 6.43 percent for FY 2021. Initial cross subsidy is defined as the district's nonfederal special education costs including transportation, less state special education aid after tuition adjustments and general education aid attributable to students receiving special education services outside of the regular classroom for at least 60.00 percent of the school day. Charter schools are not eligible for cross subsidy reduction aid.
- Updating the pupil-driven portion of the initial special education aid formula to use FY 2018 data beginning in FY 2021, rather than continuing to use 2011 data adjusted for inflation.
- Phasing out the special education aid cap over two years, with the cap eliminated for FY 2021 and beyond. For FY 2020, the cap increases to the greater of the FY 2019 cap, or the sum of 56 percent of FY 2019 program costs plus 100 percent of FY 2019 special education transportation costs and the tuition adjustment.
- Reducing the tuition rate paid by the resident school district for open enrolled special education students served by another district or charter school from 90 percent of unfunded costs to 85 percent for FY 2020, and 80 percent for FY 2021 and later. Charter schools will be eligible for additional special education aid from the state to fully offset the impact of the tuition rate change.

• Reducing the hold harmless guarantee by changing the formula to reduce reliance on the FY 2016 base year so that districts where special education expenditures have fallen or grown slowly since FY 2016 do not benefit disproportionately from the hold harmless guarantee compared to other districts. The hold harmless (minimum aid) guarantee for FY 2020 will be limited to 90.0 percent of FY 2019 regular program costs, plus 100.0 percent of special education transportation costs, plus the tuition adjustment. The percentage of FY 2019 regular program costs used to calculate the hold harmless will decrease to 85.0 percent for FY 2021, 80.0 percent for FY 2022, and 75.0 percent for FY 2023. In addition, the annual inflation adjustment used to calculate the hold harmless will be reduced by 0.2 percent annually from the 4.6 percent factor used in FY 2019 until the adjustment reaches 2.0 percent.

Safe Schools Supplemental Aid – A one-time appropriation of \$30 million was made for Safe Schools Supplemental Aid in FY 2020, contingent upon the closing balance of the state's General Fund for FY 2019 exceeding the balance projected at the end of the 2019 legislative session. If the balance exceeds the projection by \$63 million, the entire \$30 million will be appropriated. If the balance exceeds the projection by between \$33 and \$63 million, the amount over \$33 million will be appropriated. The aid would be allocated among school districts and charter schools based on their respective share of state-wide adjusted ADM for FY 2018. Districts would be required to restrict the use of the funding for the same purposes as the safe schools levy. Charter schools would be required to restrict the use for the same purposes as the safe schools levy or for building lease costs not covered by charter school lease aid.

**School Building Bond Agricultural Tax Credit** – Effective for taxes beginning with the payable 2018 levy (FY 2019), a tax credit on all property classified as agricultural (excluding the house, garage, and one acre of an agricultural homestead) was provided equal to 40 percent of the tax on the property attributable to school district building bond levies. The appropriation for this tax credit is \$34.8 million for FY 2019, \$45.2 million for FY 2020, and \$52.5 million for FY 2021. The 2019 Legislature increased the credit percentage to 50 percent for the levy payable in 2020, 55 percent for payable in 2021, 60 percent for payable in 2022, and 70 percent for payable in 2023 and thereafter.

**Forecast Adjustments** – Forecast article adjustments to FY 2019 appropriations (including final payments from FY 2018 and current payments for FY 2019) were approved to match the February 2019 forecast amount for each affected program. This eliminated the potential proration of forecasted program aids, including special education aid, for FY 2018 and FY 2019, due to the veto of the 2018 omnibus budget bill.

Operating Referendum / Local Optional Revenue – Effective for the tax levy payable in FY 2021, the operating referendum and local operational revenue (LOR) levies were simplified by transferring \$300 per pupil unit (PU) of referendum revenue to LOR, thereby eliminating the board-approved referendum levy and increasing the LOR levy authority to \$724 per PU. The referendum cap is reduced by the \$300 per PU transferred to LOR. The annual recalculation of referendum allowances approved prior to FY 2014 based on the amount of LOR a district opts to receive is also eliminated. Inflation adjusted referendum authority transferred to LOR will continue to be adjusted for the life of the referendum. This change is revenue neutral for all districts.

**Operating Referendum Equalization** – Effective for the tax levy payable in FY 2021, the equalizing factor for Tier 2 of the referendum (New Tier 1) is increased from \$510,000 to \$567,000. This is expected to provide \$9.4 million of property tax relief to taxpayers, and result in \$600,000 of additional referendum state aid for charter schools.

Pension Benefit Reforms – The 2018 pension bill included a number of reforms to the various defined benefit pension plans across the state, including the plans administered by the Teachers Retirement Association (TRA), St. Paul Teachers Retirement Fund Association (SPTRFA), and the Public Employees Retirement Association (PERA). Employer contribution rates were increased for the TRA plan (a total increase of 1.25 percent phased in over a 6-year period beginning in FY 2019) and the SPTRFA plan (a total increase of 2.50 percent phased in over a 6-year period beginning in FY 2019). Employee contribution rates were also increased by 0.25 percent beginning in FY 2024 for the TRA plan and beginning in FY 2023 for the SPTRFA plan. The pension adjustment component of the general education aid formula was increased by an amount equal to the product of the salaries paid to members of these two plans times the district's pension adjustment rate for the fiscal year to help offset the cost of the employer contribution increases.

**Board Control of Extracurricular Student Activities** — In order to align the Uniform Financial Accounting and Reporting Standards with the new requirements of Governmental Accounting Standards Board Statement No. 84, effective for FY 2020 school boards are required to take charge of and control the financial transactions related to all extracurricular student activity accounts. This eliminates the previously available alternative for school boards to allow these accounts to operate outside of board control, and thereby be accounted for and reported outside of the district's funds.

**Disposal of Surplus Computers** – Authorizes a school district to sell or give a surplus computer to a charitable organization for educational use, or to currently enrolled district students who intend to enroll the following year.



### ACCOUNTING AND AUDITING UPDATES

#### GASB STATEMENT NO. 84, FIDUCIARY ACTIVITIES

This statement is intended to enhance consistency and comparability of fiduciary activity reporting by state and local governments. It is also meant to improve the usefulness of fiduciary activity information primarily for assessing the accountability of governments in their roles as fiduciaries.

This statement establishes criteria for identifying fiduciary activities of all state and local governments. The focus of the criteria generally is on (1) whether a government is controlling the assets of the fiduciary activity and (2) the beneficiaries with whom a fiduciary relationship exists. An activity meeting the criteria should be reported in a fiduciary fund in the basic financial statements. This statement describes four fiduciary funds that should be reported, if applicable: (1) pension (and other employee benefit) trust funds, (2) investment trust funds, (3) private-purpose trust funds, and (4) custodial funds. Custodial funds generally should report fiduciary activities that are not held in a trust or equivalent arrangement that meets specific criteria. The Minnesota Department of Education has also issued guidance for implementing this standard, which will impact the reporting of extracurricular student activity accounts previously not under board control, and potentially other fiduciary funds, beginning in the 2019–2020 fiscal year.

## GASB STATEMENT NO. 87, LEASES

A lease is a contract that transfers control of the right to use another entity's nonfinancial asset as specified in the contract for a period of time in an exchange or exchange-like transaction. Examples of nonfinancial assets include buildings, land, vehicles, and equipment. Any contract that meets this definition should be accounted for under the leases guidance, unless specifically excluded in this statement.

Governments enter into leases for many types of assets. Under the previous guidance, leases were classified as either capital or operating depending on whether the lease met any of four tests. In many cases, the previous guidance resulted in reporting lease transactions differently than similar nonlease financing transactions.

The goal of this statement is to better meet the information needs of users by improving accounting and financial reporting for leases by governments. It establishes a single model for lease accounting based on the principle that leases are financings of the right to use an underlying asset. This statement increases the usefulness of financial statements by requiring recognition of certain lease assets and liabilities for leases that previously were classified as operating leases and recognized as inflows of resources or outflows of resources based on the payment provisions of the contract.

Under this statement, a lessee is required to recognize a lease liability and an intangible right-to-use lease asset, and a lessor is required to recognize a lease receivable and a deferred inflow of resources, thereby enhancing the relevance and consistency of information about governments' leasing activities.

To reduce the cost of implementation, this statement includes an exception for short-term leases, defined as a lease that, at the commencement of the lease term, has a maximum possible term under the lease contract of 12 months (or less), including any options to extend, regardless of their probability of being exercised. Lessees and lessors should recognize short-term lease payments as outflows of resources or inflows of resources, respectively, based on the payment provisions of the lease contract. The requirements of this statement are effective for reporting periods beginning after December 15, 2019.

# GASB STATEMENT No. 90, MAJORITY EQUITY INTEREST—AN AMENDMENT OF GASB STATEMENTS No. 14 and No. 61

The primary objectives of this statement are to improve the consistency and comparability of reporting a government's majority equity interest in a legally separate organization and to improve the relevance of financial statement information for certain component units.

It specifies that a majority equity interest in a legally separate organization should be reported as an investment if a government's holding of the equity interest meets the definition of an investment. It further specifies that such investments should generally be measured using the equity method, unless it is held by a special-purpose government engaged only in fiduciary activities, a fiduciary fund, or an endowment (including permanent and term endowments) or permanent fund, in which case the majority equity interest should be measured at fair value.

All other holdings of a majority equity interest in a legally separate organization that do not meet the definition of an investment result in the government being financially accountable for the legally separate organization and, therefore, the government should report that organization as a component unit, and should report an asset related to the majority equity interest using the equity method.

This statement also requires that a component unit in which a government has a 100 percent equity interest account for its assets, deferred outflows of resources, liabilities, and deferred inflows of resources at acquisition value at the date the government acquired a 100 percent equity interest in the component unit. Transactions presented in flows statements of the component unit in that circumstance should include only transactions that occurred subsequent to the acquisition.

The requirements of this statement are effective for reporting periods beginning after December 15, 2018. Earlier application is encouraged. The requirements should be applied retroactively, except for the provisions related to reporting a majority equity interest in a component unit and reporting a component unit if the government acquires a 100 percent equity interest, which should be applied prospectively.

## GASB STATEMENT NO. 91, CONDUIT DEBT OBLIGATIONS

The primary objectives of this statement are to provide a single method of reporting conduit debt obligations by issuers and eliminate diversity in practice associated with (1) commitments extended by issuers, (2) arrangements associated with conduit debt obligations, and (3) related note disclosures. This statement achieves those objectives by clarifying the existing definition of a conduit debt obligation; establishing that a conduit debt obligation is not a liability of the issuer; establishing standards for accounting and financial reporting of additional commitments and voluntary commitments extended by issuers and arrangements associated with conduit debt obligations; and improving required note disclosures.

A conduit debt obligation is defined as a debt instrument having all of the following characteristics:

- There are at least three parties involved: (1) an issuer, (2) a third party obligor, and (3) a debt holder or a debt trustee.
- The issuer and the third party obligor are not within the same financial reporting entity.
- The debt obligation is not a parity bond of the issuer, nor is it cross-collateralized with other debt of the issuer.
- The third party obligor or its agent, not the issuer, ultimately receives the proceeds from the debt issuance.
- The third party obligor, not the issuer, is primarily obligated for the payment of all amounts associated with the debt obligation (debt service payments).

This statement also addresses arrangements, often characterized as leases, that are associated with conduit debt obligations. In those arrangements, capital assets are constructed or acquired with the proceeds of a conduit debt obligation and used by third party obligors in the course of their activities.

This statement requires issuers to disclose general information about their conduit debt obligations, organized by type of commitment, including the aggregate outstanding principal amount of the issuers' conduit debt obligations and a description of each type of commitment. Issuers that recognize liabilities related to supporting the debt service of conduit debt obligations also should disclose information about the amount recognized and how the liabilities changed during the reporting period.

The requirements of this statement are effective for reporting periods beginning after December 15, 2020. Earlier application is encouraged.

