

ZION SCHOOL DISTRICT C-28

INDEPENDENT AUDITOR'S REPORT

STILWELL, ADAIR COUNTY, OKLAHOMA

JUNE 30, 2025



ZION PUBLIC SCHOOL, C-28
ADAIR COUNTY, OKLAHOMA
JUNE 30, 2025
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INDEPENDENT AUDITOR'S REPORT

To the Board of Education
Zion School District No. C28
Stilwell, Oklahoma

Report on the Audit of the Financial Statements

Opinions

I have audited the accompanying combined fund type and account group financial statements – regulatory basis of the Zion School District No. C28 (the District), Adair County, Oklahoma, as of and for the year ended June 30, 2025, as listed in the table of contents.

Qualified Opinion on Regulatory Basis of Accounting

In my opinion, except for the effects of the matter discussed in the "Basis for Qualified Opinion on Regulatory Basis of Accounting" section of my report, the combined financial statements referred to above present fairly, in all material respects, the assets, liabilities and fund balances arising from regulatory basis transactions of each fund type and account group of the District, as of June 30, 2025, and the revenues it received and expenditures it paid and encumbered for the year then ended, in accordance with the financial reporting provisions of the Oklahoma State Department of Education as described in Note 1.

Adverse Opinion on U.S. Generally Accepted Accounting Principles

In my opinion, because of the significance of the matter discussed in the "Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles" section of my report, the financial statements referred to in the first paragraph do not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of the District, as of June 30, 2025, or the revenues, expenses, and changes in net position for the year then ended.

Basis for Opinions

I conducted my audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. My responsibilities under those standards are further described in the "Auditor's Responsibilities for the Audit of the Financial Statements" section of my report. I am required to be independent of the District and to meet my other ethical responsibilities, in accordance with the relevant ethical requirements relating to my audit. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my adverse and qualified audit opinions.

Basis for Qualified Opinion on Regulatory Basis of Accounting

As discussed in Note I, the financial statements referred to above do not include the General Fixed Asset Account Group, which is a departure from the regulatory basis of accounting prescribed or permitted by the Oklahoma State Department of Education. The amount that should be recorded in the General Fixed Asset Account Group is not known.

Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles

As described in Note I to the financial statements, to meet the financial reporting requirements of the Oklahoma State Department of Education, the financial statements are prepared by the District, on the basis of the financial reporting regulations prescribed or permitted by the Oklahoma State Department of Education, which is a basis of accounting other than accounting principles generally accepted in the United States of America. The effects on the financial statements of the variances between the regulatory basis of accounting described in Note I and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material and pervasive.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with the financial reporting regulations prescribed or permitted by the Oklahoma State Department of Education as described in Note I, to meet the financial reporting requirements of the State of Oklahoma; this includes determining that the regulatory basis of accounting is an acceptable basis for the preparation of the financial statements in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the District's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

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

In performing an audit in accordance with generally accepted auditing standards and *Government Auditing Standards*, I:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in my judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the District's ability to continue as a going concern for a reasonable period of time.

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

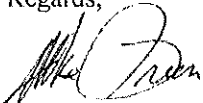
Supplementary Information

My audit was conducted for the purpose of forming opinions on the fund type and account group financial statements-regulatory basis that collectively comprise the District's basic financial statements. The accompanying combining financial statements-regulatory basis and other supplementary information and schedule of expenditures of federal awards, as required by Title 2 *U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*, are presented for purposes of additional analysis and are not a required part of the combined financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the combined financial statements-regulatory basis. The information has been subjected to the auditing procedures applied in the audit of the fund type and account group financial statements within the combined financial statements-regulatory basis and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In my opinion, except for the financial statements being prepared in compliance with the regulatory basis as prescribed by the Oklahoma State Department of Education as discussed in Note 1, the combining financial statements-regulatory basis and other supplementary information and the schedule of expenditures of federal awards are fairly stated, in all material respects, in relation to the combined financial statements-regulatory basis as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, I have also issued my report dated February 10, 2026, on my consideration of the District's internal control over financial reporting and on my tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of my testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the District's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the District's internal control over financial reporting and compliance.

Regards,



Michael Green, CPA
Stilwell, Oklahoma
February 10, 2026

ZION SCHOOL DISTRICT NO. C-28
COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCE
ALL FUND TYPES AND ACCOUNT GROUPS-REGULATORY BASIS
JUNE 30, 2025

	Governmental Fund Types		Fiduciary Fund Types	Account Group	Total (Memorandum Only)
	General Fund	Special Revenue	Trust and Agency	General Long-Term Debt	
ASSETS					
Cash and cash equivalents (Note 2)	\$ 1,808,612.91	\$ 320,690.97	\$ 59,732.51	\$ -	\$ 2,189,036.39
Investments	-	-	-	-	-
Amount to be provided for capitalized lease agreements	-	-	-	-	-
Amounts available in debt service fund	-	-	-	-	-
Amounts to be provided for retirement of general long-term debt	-	-	-	-	-
Total assets	<u>\$ 1,808,612.91</u>	<u>\$ 320,690.97</u>	<u>\$ 59,732.51</u>	<u>\$ -</u>	<u>\$ 2,189,036.39</u>
LIABILITIES AND FUND EQUITY					
Liabilities:					
Outstanding warrants	\$ 168,608.59	\$ 5,299.40	\$ -	\$ -	\$ 173,907.99
Encumbrances	-	-	-	-	-
Long-term debt					
Bonds payable	-	-	-	-	-
Interest payable	-	-	-	-	-
Capital leases	-	-	-	-	-
Due to student activities	-	-	59,732.51	-	59,732.51
Total liabilities	<u>168,608.59</u>	<u>5,299.40</u>	<u>59,732.51</u>	<u>-</u>	<u>233,640.50</u>
Fund equity:					
Restricted for:					
Plant improvement & operation	-	271,290.01	-	-	271,290.01
Child nutrition	-	44,101.56	-	-	44,101.56
Unassigned	1,640,004.32	-	-	-	1,640,004.32
Total fund balances	<u>1,640,004.32</u>	<u>315,391.57</u>	<u>-</u>	<u>-</u>	<u>1,955,395.89</u>
Total liabilities and fund equity	<u>\$ 1,808,612.91</u>	<u>\$ 320,690.97</u>	<u>\$ 59,732.51</u>	<u>\$ -</u>	<u>\$ 2,189,036.39</u>

The accompanying notes and auditor's reports are an integral part of these financial statements.

ZION SCHOOL DISTRICT NO. C-28
COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES,
AND CHANGES IN FUND BALANCE
ALL GOVERNMENTAL FUND TYPES - REGULATORY BASIS
JUNE 30, 2025

	Governmental Fund Types		Fiduciary Fund Types	Total (Memorandum only)
	General Fund	Special Revenue	Trust and Agency	
Revenues collected:				
Local sources	\$ 278,861.47	\$ 33,883.63	\$ 141,896.70	\$ 454,641.80
Intermediate sources	41,544.43	-	-	41,544.43
State sources	2,395,118.13	137,373.23	-	2,532,491.36
Federal sources	703,115.67	394,037.00	-	1,097,152.67
Total revenues collected	<u>3,418,639.70</u>	<u>565,293.86</u>	<u>141,896.70</u>	<u>4,125,830.26</u>
Expenditures paid:				
Instruction	2,224,202.79	-	143,909.45	2,368,112.24
Support Services	1,152,480.51	209,722.03	-	1,362,202.54
Non-Instructional services	-	257,304.37	-	257,304.37
Capital outlay	-	-	-	-
Other outlays	-	-	-	-
Debt services:				
Principal retirement	-	-	-	-
Interest	-	-	-	-
Total expenditures paid	<u>3,376,683.30</u>	<u>467,026.40</u>	<u>143,909.45</u>	<u>3,987,619.15</u>
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances	<u>41,956.40</u>	<u>98,267.46</u>	<u>(2,012.75)</u>	<u>138,211.11</u>
Adjustments to prior year encumbrances	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Other financing sources (uses):				
Bond sale proceeds	-	-	-	-
Operating transfers in & estopped warrants	-	-	-	-
Operating transfers out	-	-	-	-
Total other financing sources (uses)	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Excess (deficiency) of revenues and other resources over expenditures and other financing sources (uses)	<u>41,956.40</u>	<u>98,267.46</u>	<u>(2,012.75)</u>	<u>138,211.11</u>
Fund balances, beginning of year	<u>1,598,047.92</u>	<u>217,124.11</u>	<u>61,745.26</u>	<u>1,876,917.29</u>
Fund balances, end of year	<u>\$ 1,640,004.32</u>	<u>\$ 315,391.57</u>	<u>\$ 59,732.51</u>	<u>\$ 2,015,128.40</u>

*Building
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C/F*

The accompanying notes and auditor's reports are an integral part of these financial statements.

ZION SCHOOL DISTRICT NO. C-28
COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES,
AND CHANGES IN FUND BALANCE - BUDGET AND ACTUAL-
GENERAL AND SPECIAL REVENUE FUNDS-REGULATORY BASIS
JUNE 30, 2025

	General Fund			Special Revenue Funds (Building and Child Nutrition only)		
	Original Budget	Final Budget	Actual	Original Budget	Final Budget	Actual
Revenues collected:						
Local sources	\$ 283,252.64	\$ 283,252.64	\$ 278,861.47	\$ 27,649.99	\$ 27,649.99	\$ 33,883.63
Intermediate sources	12,741.11	12,741.11	41,544.43	-	-	-
State sources	2,356,152.77	2,356,152.77	2,395,118.13	17,203.79	17,203.79	137,373.23
Federal sources	564,322.52	564,322.52	703,115.67	265,000.00	265,000.00	394,037.00
Supplemental revenue adjustments	-	-	-	-	-	-
Total revenues collected	<u>3,216,469.04</u>	<u>3,216,469.04</u>	<u>3,418,639.70</u>	<u>309,853.78</u>	<u>309,853.78</u>	<u>565,293.86</u>
Expenditures paid:						
Instruction	3,658,986.90	3,658,986.90	2,224,202.79	-	-	-
Support services	1,152,480.51	1,152,480.51	1,152,480.51	232,510.96	232,510.96	467,026.40
Non-instructional services	-	-	-	294,466.93	294,466.93	-
Capital outlays	-	-	-	-	-	-
Other outlays	3,049.55	3,049.55	-	-	-	-
Total expenditures paid	<u>4,814,516.96</u>	<u>4,814,516.96</u>	<u>3,376,683.30</u>	<u>526,977.89</u>	<u>526,977.89</u>	<u>467,026.40</u>
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances	<u>(1,598,047.92)</u>	<u>(1,598,047.92)</u>	<u>41,956.40</u>	<u>(217,124.11)</u>	<u>(217,124.11)</u>	<u>98,267.46</u>
Adjustments to prior year encumbrances	-	-	-	-	-	-
Other financing sources (uses):						
Operating transfers in & stopped warr.	-	-	-	-	-	-
Operating transfers out	-	-	-	-	-	-
Total other financing sources (uses)	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Excess (deficiency) of revenues and other resources over expenditures and other financing sources (uses)	<u>(1,598,047.92)</u>	<u>(1,598,047.92)</u>	<u>41,956.40</u>	<u>(217,124.11)</u>	<u>(217,124.11)</u>	<u>98,267.46</u>
Fund balances, beginning of year	<u>1,598,047.92</u>	<u>1,598,047.92</u>	<u>1,598,047.92</u>	<u>217,124.11</u>	<u>217,124.11</u>	<u>217,124.11</u>
Fund balances, end of year	<u>\$ -</u>	<u>\$ -</u>	<u>\$1,640,004.32</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 315,391.57</u>

The accompanying notes and auditor's reports are an integral part of these financial statements.

ZION SCHOOL DISTRICT No. C-28
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2025

1. Summary of Significant Accounting Policies

The financial statements of the Zion Public School District No. C-28 (the "District") have been prepared in conformity with the accounting and financial reporting regulations prescribed or permitted by the Oklahoma State Department of Education, which is an other comprehensive basis of accounting other than generally accepted accounting principles. Accordingly, the accompanying financial statements are not intended to present financial position and results of operations in conformity with accounting principles generally accepted in the United States of America. The district's accounting policies are described in the following notes that are an integral part of the District's financial statements.

A. Reporting Entity

The District is a corporate body for public purposes created under Title 70 of the Oklahoma Statutes and accordingly is a separate entity for operating and financial reporting purposes. The District is part of the public-school system of Oklahoma under the general direction and control of the State Board of Education and is financially dependent on State of Oklahoma support. The general operating authority for the public-school system is the Oklahoma School Code contained in Title 70, Oklahoma Statutes.

The governing body of the District is the Board of Education composed of elected members. The appointed superintendent is the executive officer of the District. The Board, constituting an on-going entity, is the level of government which has governance responsibilities over all activities related to public elementary and secondary school education within the jurisdiction of the Local Independent School District. The District receives funding from local, state and federal government sources and must comply with the requirements of these funding source entities. The District is not included in any other governmental "reporting entity" as defined in Section 2100, Codification of Governmental Accounting and Financial Reporting Standards, since Board members are elected by the public and have decision making authority, the power to designate management, the responsibility to significantly influence operations and primary accountability for fiscal matters.

In evaluating how to define the district, for financial reporting purposes, management has considered all potential component units. The decision to include a potential component unit in the reporting entity was made by applying the criteria established by the Governmental Accounting Standards Board (GASB). The basic -- but not the only -- criterion for including a potential component unit within the reporting entity is the governing body's ability to exercise oversight responsibility. The most significant manifestation of this ability is financial interdependency. Other manifestations of the ability to exercise oversight responsibility include, but are not limited to, the selection of governing authority, the designation of management, the ability to significantly influence operations, and accountability for fiscal matters. A second criterion used in evaluating potential component units is the scope of public service. Application of this criterion involves considering whether the activity benefits the District and/or its citizens, or whether the activity is conducted within the geographic boundaries of the District and is generally available to its patrons. A third criterion used to evaluate potential component units for inclusion or exclusion from the reporting entity is the existence of special financing relationships, regardless of whether the District is able to exercise oversight responsibilities. Based upon the application of these criteria, there are no potential component units included in the District's reporting entity.

B. Measurement Focus

The District uses funds and account groups to report on its financial position and the results of its operations. Fund accounting is designed to demonstrate legal compliance and to aid financial management by segregating transactions related to certain district functions or activities.

A fund is a separate accounting entity with a self-balancing set of accounts. An account group, on the other hand, is a financial reporting device designed to provide accountability for certain assets and liabilities that are not recorded in the funds because they do not directly affect net expendable available financial resources.

Funds are classified into three categories: governmental, proprietary and fiduciary. Each category, in turn, is divided into separate "fund types."

Governmental Fund Types

Governmental funds are used to account for all or most of a government's general activities, including the collection and disbursement of earmarked monies (special revenue funds), the acquisition or construction of general fixed assets (capital projects funds), and the servicing of general long-term debt (debt service funds).

General Fund - The general fund is used to account for all financial transactions except those required to be accounted for in another fund. Major revenue sources include state and local property taxes and state funding under the Foundation and Incentive Aid Program. Expenditures include all costs associated with the daily operations of the schools except for programs funded for building repairs and maintenance, school construction and debt service on bonds and other long-term debt. The general fund includes federal and state restricted monies that must be expended for specific programs.

Special Revenue Fund - The first special revenue fund is the District's Building Fund. The building fund consists of monies derived from property taxes levied for the purpose of erecting, remodeling, or repairing buildings and for purchasing furniture and equipment.

The second special revenue fund is the Child Nutrition Fund, a special revenue fund used to account for monies derived from federal and state reimbursement and local food service collection.

Debt Service Fund - The debt service fund is the District's Sinking Fund and is used to account for the accumulation of financial resources for the payment of general long-term debt principal, interest and related costs. The primary revenue sources are local property taxes levied specifically for debt service and interest earnings from temporary investments.

Capital Projects Fund - The capital projects fund is the District's Bond Fund and is used to account for the proceeds of bond sales to be used exclusively for acquiring school sites, constructing and equipping new school facilities, renovating existing facilities, and acquiring transportation equipment.

Proprietary Fund Types

Any proprietary funds are used to account for activities similar to those found in the private sector, where the determination of net income is necessary or useful to sound financial administration. Goods or services from such activities can be provided either to outside parties (enterprise funds) or to other departments or agencies primarily within the District (internal service funds). The District does not have any proprietary funds.

Fiduciary Fund Types

Fiduciary funds are used to account for assets held on behalf of outside parties, including other governments, or on behalf of other funds within the District. When these assets are held under the terms of a formal trust agreement, either a nonexpendable trust fund or an expendable trust fund is used. The terms "nonexpendable" and "expendable" refer to whether or not the District is under an obligation to maintain the trust principal. Agency funds generally are used to account for assets that the District holds on behalf of others as their agent and do not involve measurement of results of operations.

Agency Fund - The Agency fund is the School Activities fund which is used to account for monies collected principally through fund-raising efforts of the students and District-sponsored groups. The administration is responsible, under the authority of the Board, of collecting, disbursing and accounting for these activity funds.

Account groups

Are not funds and consist of a self-balancing set of accounts used only to establish accounting control over long-term debt and general fixed assets not accounted for in proprietary funds.

General Long-Term Debt Account Group - This account group was established to account for all long-term debt of the District, which is offset by the amount available in the debt service fund and the amount to be provided in future years to complete retirement of the debt principal. It is also used to account for liabilities for compensated absences and early retirement incentives which are to be paid from funds provided in future years.

General Fixed Asset Account Group - This account group is used to account for property, plant and equipment of the school district. The district does not maintain a record of its general fixed assets, and accordingly, a statement of general fixed assets, required by the regulatory basis of accounting prescribed or permitted by the State Department of Education, is not included in the financial statements. Land, buildings, nonstructural improvements, and all other physical assets in all funds are considered expenditures in the year of acquisition and are not recorded as assets for financial statement purposes.

Memorandum Only - Total Column

The total column on the financial statements is captioned "memorandum only" to indicate that it is presented only to facilitate financial analysis. Data in this column does not present financial position, results of operations or cash flows in conformity with generally accepted accounting principles. Neither is such data comparable to a consolidation. Interfund eliminations have not been made in the aggregation of this data.

C. Basis of Accounting

The District prepares its financial statements in a presentation format that is prescribed by the Oklahoma State Department of Education. This format is essentially the generally accepted form of presentation used by state and local governments prior to the effective date of GASB Statement No. 34, *Basic Financial Statements – Management's Discussion and Analysis – for State and Local Governments*. This format significantly differs from that required by GASB 34.

The basic financial statements are essentially prepared on a basis of cash receipts and disbursements modified as required by the regulations of the Oklahoma State Department of Education (OSDE) as follows:

- a. Encumbrances represented by purchase orders, contracts, and other commitments for the expenditure of monies are recorded as expenditures when approved.
- b. Investments and inventories are recorded as assets when purchased.

- c. Inventories of school supplies are recorded as expenditures and not as assets.
- d. Warrants payable are recorded as liabilities when issued.
- e. Long-term debt is recorded in the General Long-term Debt Account Group and not in the basic financial statements.
- f. Compensated absences are recorded as an expenditure when paid and not recorded as a liability.
- g. A General Fixed Asset Account Group is required or expected by the Department of Education and is presented in such an account group but is not depreciated.
- h. Management's Discussion and Analysis (MD&A) is not required to be present.

This regulatory basis of accounting differs from accounting principles generally accepted in the United States of America, which require revenues to be recognized when they become available and measurable, or when they are earned, and expenditures or expenses to be recognized when the related liabilities are incurred for governmental fund types; and, when revenues are earned.

Basis of accounting refers to when revenues and expenditures are recognized in the accounts and reported in the financial statements. Basis of accounting relates to the timing of measurements made, regardless of the measurement focus applied.

All governmental type funds are accounted for using the Regulatory (Statutory) basis of accounting. Revenues are recognized when they are received rather than earned. Under the Statutory basis of accounting, expenditures are generally recognized when encumbered/reserved rather than at the time the related fund liability is incurred. Fiduciary type funds are accounted for using the cash basis of accounting. These practices differ from generally accepted accounting principles.

D. Budgets and Budgetary Accounting

The District is required by state law to prepare an annual budget. A preliminary budget must be submitted to the Board of Education by December 31 for the fiscal year beginning the following July 1. If the preliminary budget requires an additional levy, the District must hold an election on the first Tuesday in February to approve the levy. If the preliminary budget does not require an additional levy, it becomes the legal budget. If an election is held and the taxes are approved, then the preliminary budget becomes the legal budget. If voters reject the additional taxes, the District must adopt a budget within the approved tax rate.

EON A budget is legally adopted by the Board of Education for the General Fund, Special Revenue Funds (Building Fund and Child Nutrition Fund) and the Debt Service Fund, that includes revenues and expenditures.

The 2024-25 Estimate of Needs was approved by the Board and subsequently filed with the County Clerk. The Estimate of Needs was approved by the excise board, and the requested levies were made.

E. Encumbrances

Encumbrances represent commitments related to unperformed contracts for goods or services. Encumbrance accounting -- under which purchase orders and other commitments of resources are recorded as expenditures of the applicable fund -- is utilized in all governmental funds of the District. Appropriations not used or encumbered lapse at the end of the year.

F. Assets, Liabilities and Fund Balance

Cash and Cash Equivalents - The District considers all cash on hand, demand deposits and highly liquid investments, with an original maturity of three months or less.

Investments - Investments consist of direct obligations of the United States Government and Agencies with maturities greater than three months when purchased. All investments are recorded at cost, which approximates market value.

Inventories - Purchases for inventory items are considered expenditures when the items are encumbered.

Fixed Assets and Property, Plant and Equipment - The General Fixed Asset Account Group is not presented. The amount that should be recorded in the General Fixed Asset Account Group is not known.

Compensated Absences - Vested or accumulated vacation leave that is expected to be liquidated with expendable available financial resources has not been reported as an expenditure or a fund liability of the governmental fund that will pay it since the combined financial statements have been prepared on the regulatory basis of accounting. Vested accumulated rights to receive sick pay benefits have not been reported in the general long-term debt account group since the combined financial statements have been prepared on the regulatory basis of accounting. These practices differ from generally accepted accounting principles in the United States of America.

Long-Term Debt - Long-term debt is recognized as a liability of a governmental fund when due, or when resources have been accumulated in the debt service fund for payment early in the following year. For other long-term obligations, only that portion expected to be financed from expendable available financial resources is reported as a fund liability of a governmental fund. The remaining portion of such obligations is reported in the general long-term debt account group.

Fund Balance - Fund balance represents the funds not encumbered by purchase order, legal contracts, and outstanding warrants.

In the fund financial statements, governmental funds report the hierarchy of fund balances. The hierarchy is based primarily on the degree of spending constraints placed upon use of resources for specific purposes versus availability of appropriation. An important distinction that is made in reporting fund balance is between amounts that are considered *nonspendable* (i.e., fund balance associated with assets that are *not in spendable form*, such as inventories or prepaid items, long-term portions of loans and notes receivable, or items that are legally required to be maintained intact (such as the corpus of a permanent fund) and those that are *spendable* (such as fund balance associated with cash, investments or receivables).

Amounts in the *spendable* fund balance category are further classified as *restricted*, *committed*, *assigned* or *unassigned*, as appropriate.

- **Restricted** fund balance represents amounts that are constrained either externally by creditors (such as debt covenants), grantors, contributors or laws or regulations of other governments, or by law, through constitutional provisions or enabling legislation.

- **Committed** fund balance represents amounts that are useable only for specific purposes by formal action of the government's highest level of decision-making authority. Such amounts are not subject to legal enforceability (like restricted amounts) but cannot be used for any other purpose unless the government removes or changes the limitation by taking action similar to that which imposed the commitment. The School Board is the highest level of decision-making authority of the School District.

- **Assigned** fund balance represents amounts that are *intended* to be used for specific purposes but are neither restricted nor committed. Intent is expressed by the governing body itself, or a subordinated high-level body or official who the governing body has delegated the authority to assign amounts to be used for specific

purposes. Assigned fund balances include all remaining spendable amounts (except negative balances) that are reported in governmental funds *other than the general fund* that are neither restricted nor committed, and amounts in the general fund that are intended to be used for specific purpose in accordance with the provisions of the standard.

- **Unassigned** fund balance is the residual classification for the general fund. It represents the amounts that have not been assigned to other funds, and that have not been restricted, committed, or assigned to specific purposes within the general fund.

G. Revenue, Expenses and Expenditures

Property Tax Revenues and Other Local Revenues - The District is authorized by state law to levy property taxes which consist of ad valorem taxes on real and personal property within the District. The County Assessor, upon receipt of the certification of tax levies from the County Excise Board, extends the tax levies on the roll for submission to the County Treasurer prior to October 1. The County Treasurer must commence tax collection within fifteen days of receipt of the tax rolls. The first half of taxes is due prior to January 1. The second half is due prior to April 1. If the first payment is not made timely, the entire tax becomes due and payable on January 2. Second half taxes become delinquent on April 1 of the year following the year of assessment. If not paid by the following October 1, the property is offered for sale for the amount of taxes due. The owner has two years to redeem the property by paying the taxes and penalty owed. If at the end of two years the owner has not done so, the purchaser is issued a deed to the property. No provision has been made for uncollected taxes, as all taxes are deemed collectable. Other local sources of revenue include tuition, fees, rental, disposals, commissions, and reimbursements.

Intermediate Revenues -Revenue from intermediate source is the amount of money from funds collected by an intermediate administrative unit, or a political subdivision between the district and the state and distributed to districts in amounts that differ in proportion to those which were collected within such systems.

State Revenues - Revenues from state sources for current operations are primarily governed by the state aid formula under the provisions of Article XVIII, Title 70, Oklahoma Statutes. The State Board of Education administers the allocation of state aid funds to school districts based on information accumulated from the districts.

After reviewing and verification of reports and supporting documentation, the State Department of Education may adjust subsequent fiscal period allocations of money for prior year errors disclosed by review. Normally, such adjustments are treated as reductions or additions of revenue for the year when the adjustment is made.

The District receives revenue from the state to administer certain categorical educational programs. State Board of Education rules require that revenue earmarked for these programs be expended only for the program for which the money is provided and require that the money not expended as of the close of the fiscal year be carried forward into the following year to be expended for the same categorical programs. The State Department of Education requires that categorical educational program revenues be accounted for in the general fund.

Federal Revenues - Federal revenues consist of revenues from the federal government in the form of operating grants or entitlements. An operating grant is a contribution to be used for a specific purpose, activity or facility. A grant may be received either directly from the federal government or indirectly as a pass through

from another government, such as the state. Entitlement is the amount of payment to which the District is entitled pursuant to an allocation formula contained in applicable statutes. The majority of the federal revenues received by the District are apportioned to the general fund. The District maintains a separate child nutrition fund and the federal revenues received for the child nutrition programs are apportioned there.

Non-Monetary Transactions — The District receives commodities from the U.S. Department of Agriculture. The value of these commodities has been included in the Schedule of Expenditures of Federal wards; however, they have not been reflected in the combined financial statements as either revenue or expense since they are not reported under the regulatory basis of accounting.

Interfund Transactions - Quasi-external transactions are accounted for as revenues, expenditures or expenses. Transactions that constitute reimbursements to a fund or expenditures/expenses initially made from it that are properly applicable to another fund, are recorded as expenditures/expenses in the fund that is reimbursed.

All other interfund transactions, except quasi-external transactions and reimbursements, are reported as transfers. Nonrecurring or nonroutine permanent transfers of equity are reported as residual equity transfers. All other interfund transfers are reported as operating transfers. There were no operating transfers or residual equity transfers during fiscal year 2025.

Use of Estimates – The preparation of financial statements in conformity with the regulatory basis of accounting requires management to make estimates and assumptions that effect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Accordingly, actual results could differ from those estimates.

2. Cash and Investments

The District's investment policies are governed by state statute. Permissible investments include direct obligations of the United States Government and Agencies; certificates of deposit of savings and loan associations, and bank and trust companies; and savings accounts or savings certificates of savings and loan associations, and trust companies; Collateral is required for demand deposits and certificates of deposit for all amounts not covered by federal deposit insurance. As of the current fiscal year end, the District's bank balance was \$2,196,231. This balance was covered by FDIC and collateral pledged by the bank.

Therefore, the District's cash deposits and investments at June 30, 2025, were not exposed to Custodial Credit Risk, Investment Credit Risk, Investment Interest Rate Risk, or Concentration of Investment Credit Risk. The District does not have a formal investment policy that limits investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates.

3. Interfund Receivables and Payables

There were no interfund receivables and payables at June 30, 2025.

4. General Long-term Debt

There was no general long-term debt at June 30, 2025.

5. Other Post Employment Benefits

The District does not offer any early retirement incentive plans.

6. Employee Retirement System

The District participates in the state-administered Oklahoma Teachers' Retirement System (the "System"), which is a cost-sharing, multiple-employer public employee retirement system (PERS). Under the system, contributions are made by the District, the State of Oklahoma, and the participating employees.

Participation is required for all teachers and other certified employees and is optional for all other regular employees of public educational institutions who work at least 20 hours per week. A participant's date of membership is the date the first contribution is made to the System. The System is administered by a Board of Trustees which acts as a fiduciary for investing the funds and governing the administration of the System. The District has no responsibility or authority for the operation and administration of the System nor has it any liability, except for the current contribution requirements.

A participant with five years of creditable service may retire with a normal retirement allowance at the age of sixty-two or with reduced benefits as early as age fifty-five. The normal retirement allowance paid monthly for life and then to beneficiaries, if certain options are exercised, equals two percent of the average of the highest three earning years on contributory service multiplied by the number of years of credited service. A participant leaving employment before attaining retirement age, but completing ten years of service, may elect to vest his accumulated contributions and defer receipt of a retirement annuity until a later date.

When a participant dies in active service and has completed ten years of credited service, the beneficiary is entitled to a death benefit of \$18,000.00 and the participant's contributions plus interest. If the beneficiary is a surviving spouse, the surviving spouse may, in lieu of the death benefit, elect to receive, subject to the surviving spousal options, the participant's retirement benefits accrued at the time of death.

The contribution rates for the District, which are not actuarially determined, and its employees are established by law. The District is required by statute to contribute 9.5% of applicable compensation for the year ended June 30, 2025. The District is allowed by the Oklahoma Teacher's Retirement System to make the required contributions on behalf of the participating members. The required contribution for participating members is 7%.

The District's contributions to the System for the years ending

June 30, 2025:	\$253,233
June 30, 2024:	\$267,537
June 30, 2023:	\$238,547

The pension benefit obligation is a standardized disclosure measure of the present value of pension benefits. This pension valuation method reflects the present value of estimated pension benefits that will be paid in future years as a result of employee services performed to date and is adjusted for the effect of projected salary increases. There are no actuarial valuations performed on individual school districts. The Oklahoma Teachers' Retirement System issues a publicly available financial report that includes financial statements and required supplementary information for the System.

The system issues an independent financial report, financial statements, and required supplementary information that may be obtained by writing to the Oklahoma Teachers' Retirement System, P.O. Box 53624, Oklahoma City, OK 73152 or by calling 405-521-2387.

7. Contingencies and Other Commitments

Amounts received or receivable from grantor agencies are subject to audit and adjustment by grantor agencies. Any disallowed claims, including amounts already collected, may constitute a liability of the

applicable funds. The amount, if any, of expenditures which may be disallowed by the grantor cannot be determined at this time although the District expects such amounts, if any, to be immaterial.

8. Risk Management

The District purchases commercial insurance policies covering property casualty loss, public liability, school board member and administrator liability, and workers compensation. The District also purchases surety bonds for employees in all positions required by state law to be bonded. Management believes such coverage is sufficient to preclude any significant uninsured losses to the District.

The District is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; or acts of God. The District purchases commercial insurance to cover these risks, including general and auto liability, property damage, and public officials liability. Settled claims resulting from these risks have not exceeded the commercial insurance coverage in any of the past three fiscal years.

The District also participates in a risk pool for Workers' Compensation coverage in which there is a transfer or pooling of risks among the participants of that pool. In accordance with professional standards, the School reports the required contribution to the pool, net of refunds, as insurance expense. The risk pool is the Oklahoma School Assurance group (OSAG), an organization formed for the purpose of providing workers' compensation coverage to participating schools in the State of Oklahoma. In that capacity, OSAG is responsible for providing loss control services and certain fiscal activities, including obtaining contract arrangements for the underwriting, excess insurance agreements, claims processing, and legal defense for any and all claims submitted to them during the plan year. As a member of OSAG, the District is required to pay fees set by OSAG according to an established payment schedule. A portion of the fees paid by the District goes into a loss fund for the District. The fee for the loss fund is calculated by projecting losses based on the school's losses for the last five years. OSAG provides coverage in excess of the Loss Fund so the District's liability for claim loss is limited to the balance of the loss fund. If the District does not use their loss fund in three years, it is returned to them with no interest.

The District is also a member of the Oklahoma Public Schools Unemployment Compensation Program. In this Program, the District is required to contribute 1.6% of their taxable payroll for unemployment. The funds for each District are kept Separate. The money contributed by each District does not earn interest and is fully insured. If the District has claims in excess of the amount their account, they would be liable for the excess.

9. Accumulated Unpaid Vacation, Sick Leave Benefits, and Health Care Coverage

The District provides sick leave benefits to the certified staff in accordance with Title 70, Article 6-104, of the Oklahoma Statutes, which provides for an annual accrual of sick leave of ten days and personal business days accrual of three days. Ten days are allowed to accumulate up to a total of sixty days per employee. None of the benefits are payable upon retirement or death.

10. Subsequent Events

Subsequent events have been evaluated through February 10, 2026, which is the date of the financial statements were available to be issued.

ZION SCHOOL DISTRICT C-28
COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES
ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2025

	Building Fund	Child Nutrition Fund	Total
	<u> </u>	<u> </u>	<u> </u>
ASSETS			
Cash	\$ 271,290.01	\$ 49,400.96	\$ 320,690.97
Investments	<u>-</u>	<u>-</u>	<u>-</u>
Total assets	<u>\$ 271,290.01</u>	<u>\$ 49,400.96</u>	<u>\$ 320,690.97</u>
LIABILITIES AND FUND BALANCE			
Liabilities:			
Outstanding warrants	\$ -	\$ 5,299.40	\$ 5,299.40
Encumbrances	<u>-</u>	<u>-</u>	<u>-</u>
Total liabilities	-	5,299.40	5,299.40
Fund balances: restricted	<u>271,290.01</u>	<u>44,101.56</u>	<u>315,391.57</u>
Total liabilities and fund balances	<u>\$ 271,290.01</u>	<u>\$ 49,400.96</u>	<u>\$ 320,690.97</u>

The accompanying notes and auditor's reports are an integral part of these financial statements.

ZION SCHOOL DISTRICT C-28
COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES,
AND CHANGES IN FUND BALANCES - ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS
JUNE 30, 2025

	Building Fund	Child Nutrition Fund	Total
Revenues Collected:			
District sources	\$ 26,918.22	\$ 6,965.41	\$ 33,883.63
Intermediate sources	-	-	-
State sources	122,746.17	14,627.06	137,373.23
Federal sources	122,650.00	271,387.00	394,037.00
Total revenues collected	<u>272,314.39</u>	<u>292,979.47</u>	<u>565,293.86</u>
Expenditures paid:			
Instruction	-	-	-
Support services	209,722.03	-	209,722.03
Non-instruction services	-	257,304.37	257,304.37
Capital outlay	-	-	-
Other outlays	-	-	-
Total expenditures paid	<u>209,722.03</u>	<u>257,304.37</u>	<u>467,026.40</u>
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances	<u>62,592.36</u>	<u>35,675.10</u>	<u>98,267.46</u>
Adjustments to prior year encumbrances	<u>-</u>	<u>-</u>	<u>-</u>
Other financing sources (uses)			
Operating transfers in & estopped warr.	-	-	-
Operating transfer out	<u>-</u>	<u>-</u>	<u>-</u>
Total other financing sources (uses)	<u>-</u>	<u>-</u>	<u>-</u>
Excess (deficiency) of revenues and other resources over expenditures and other uses	62,592.36	35,675.10	98,267.46
Fund balances, restricted, beginning of year	<u>208,697.65</u>	<u>8,426.46</u>	<u>217,124.11</u>
Fund balances, restricted, end of year	<u>\$ 271,290.01</u>	<u>\$ 44,101.56</u>	<u>\$ 315,391.57</u>

The accompanying notes and auditor's reports are an integral part of these financial statements.

ZION SCHOOL DISTRICT C028
COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES,
AND CHANGES IN FUND BALANCES - SPECIAL REVENUE (BUILDING AND CHILD NUTRITION ONLY) FUNDS-REGULATORY BASIS
JUNE 30, 2025

	Special Revenue Funds					
	Building Fund			Child Nutrition Fund		
	Orig budget	Final budget	Actual	Orig budget	Final budget	Actual
Revenues collected:						
Local sources	\$ 23,813.31	\$ 23,813.31	\$ 26,918.22	\$ 3,836.68	\$ 3,836.68	\$ 6,965.41
Intermediate sources	-	-	-	-	-	-
State sources	-	-	122,746.17	17,203.79	17,203.79	14,627.06
Federal sources	-	-	122,650.00	265,000.00	265,000.00	271,387.00
Supplemental Revenue adjustments	-	-	-	-	-	-
Total revenues collected	23,813.31	23,813.31	272,314.39	286,040.47	286,040.47	292,979.47
Expenditures paid:						
Instruction	-	-	-	-	-	-
Support services	232,510.96	232,510.96	209,722.03	-	-	-
Non-instruction services	-	-	-	294,466.93	294,466.93	257,304.37
Capital outlay	-	-	-	-	-	-
Other outlays	-	-	-	-	-	-
Total expenditures paid	232,510.96	232,510.96	209,722.03	294,466.93	294,466.93	257,304.37
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances	(208,697.65)	(208,697.65)	62,592.36	(8,426.46)	(8,426.46)	35,675.10
Adjustments to prior year encumbrances	-	-	-	-	-	-
Other financing sources (uses)	-	-	-	-	-	-
Operating transfers in & stopped war	-	-	-	-	-	-
Operating transfers out	-	-	-	-	-	-
Total other financing sources (uses)	-	-	-	-	-	-
Excess (deficiency) of revenues and other resources over expenditures and other financing sources (uses)	(208,697.65)	(208,697.65)	62,592.36	(8,426.46)	(8,426.46)	35,675.10
Fund bal., restricted, beginning of year	208,697.65	208,697.65	208,697.65	8,426.46	8,426.46	8,426.46
Fund bal., restricted, end of year	\$ -	\$ -	\$ 271,290.01	\$ -	\$ -	\$ 44,101.56

The accompanying notes and auditor's reports are an integral part of these financial statements.

ZION SCHOOL DISTRICT C-28
STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES
FIDUCIARY FUNDS-REGULATORY BASIS
JUNE 30, 2025

	Agency Fund Activity Funds
ASSETS	
Cash	\$ 59,732.51
Investments	-
Due from other funds	-
Total assets	<u><u>\$ 59,732.51</u></u>
LIABILITIES AND FUND EQUITY	
Liabilities:	
Due to student, parent and booster activities	\$ 59,732.51
Due to administrative activities	-
Total liabilities	59,732.51
Fund balance:	
Reserved	-
Unreserved/undesignated	-
Total fund balance	<u>-</u>
Total liabilities and fund balances	<u><u>\$ 59,732.51</u></u>

The accompanying notes and auditor's reports are an integral part of these financial statements.

ZION SCHOOL DISTRICT C-28
STATEMENT OF CHANGES IN ASSETS AND LIABILITIES
FIDUCIARY FUNDS - REGULATORY BASIS
JUNE 30, 2025

ACTIVITIES	Balance	Transfers	Additions	Deletions	Balance
	June 30, 2024				June 30, 2025
OTHER	\$ 12,948.51		\$ 3,938.51	\$ 3,205.07	\$ 13,681.95
ATHLETICS	22,192.76		60,582.68	62,594.76	20,180.68
8TH GRADE	2,439.87	2,200.00	2,067.00	5,529.25	1,177.62
CHRISTMAS	1,145.02		11,539.70	12,384.92	299.80
YEARBOOK	194.56		1,251.00	1,400.00	45.56
CHEERLEADERS	3,920.73		8,477.63	8,074.06	4,324.30
4-H	2,765.85		12,040.47	9,500.21	5,306.11
MAKER SPACE	0.01		-	-	0.01
GIFTED	6,758.54		5,426.93	7,458.50	4,726.97
PRESCHOOL	1.91		374.13	374.13	1.91
1ST GRADE	78.00		400.00	400.00	78.00
4TH GRADE	1,929.82		7,100.00	6,170.80	2,859.02
SPECIAL ED	982.10		528.25	397.45	1,112.90
7TH GRADE	2,464.08	(2,200.00)	25,539.10	23,590.45	2,212.73
2ND GRADE	117.67		193.00	184.00	126.67
6TH GRADE	645.79		-	-	645.79
3RD GRADE	851.95		878.30	590.53	1,139.72
ACADEMIC	2,308.09		1,560.00	2,055.32	1,812.77
TOTAL ACTIVITY	\$ 61,745.26	-	\$ 141,896.70	\$ 143,909.45	\$ 59,732.51

The accompanying notes and auditor's reports are an integral part of these financial statements.

Michael Green
Certified Public Accountant
827 WEST LOCUST STREET
STILWELL, OK 74960
918-696-6298

INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND
ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF COMBINED FINANCIAL
STATEMENTS PERFORMED IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS*

To the Board of Education
Zion School District No. C-28
Stilwell, Oklahoma

I have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the accompanying fund type and account group financial statements-regulatory basis of Zion School District No. C-28 (the School), Oklahoma as listed in the Table of Contents, as of and for the year ended June 30, 2025, and the related notes to the financial statements, which collectively comprise the School's financial statements, and have issued my report thereon dated February 10, 2026, which was adverse with respect to the presentation of the financial statements in conformity with accounting principles generally accepted in the United States because the presentation followed the regulatory basis of accounting for Oklahoma school districts and did not conform to the presentation requirements of the Governmental Accounting Standards Board. However, my report was qualified for the omission of general fixed asset account groups with respect to the presentation of financial statements on the regulatory basis of accounting authorized by the Oklahoma State Board of Education.

Report on Internal Control Over Financial Reporting

In planning and performing my audit of the financial statements, I considered the School's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing my opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the School's internal control. Accordingly, I do not express an opinion on the effectiveness of the School's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

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

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the school's financial statements are free of material misstatement, I performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of my audit, and

accordingly, I do not express such an opinion. The results of my tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

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

Regards,

A handwritten signature in black ink, appearing to read "Michael Green", written over a horizontal line.

Michael Green, CPA
Stilwell, Oklahoma
February 10, 2026

Michael Green
Certified Public Accountant
827 WEST LOCUST STREET
STILWELL, OK 74960
918-696-6298

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

To the Board of Education
Zion School District No. C028
Stilwell, Oklahoma

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

I have audited Zion School District No. C028's (the School) compliance with the types of compliance requirements identified as subject to audit in the OMB *Compliance Supplement* that could have a direct and material effect on each of the School's major federal programs for the year ended June 30, 2025. The School's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

In my opinion, the School complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2025.

Basis for Opinion on Each Major Federal Program

I conducted my audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). My responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of my report.

I am required to be independent of the School and to meet my other ethical responsibilities, in accordance with relevant ethical requirements relating to my audit. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion on compliance for each major federal program. My audit does not provide a legal determination of the School's compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to the School's federal programs.

Auditor's Responsibilities for the Audit of Compliance

My objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the School's compliance based on my audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a

reasonable user of the report on compliance about the School's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance, I:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the School's compliance with the compliance requirements referred to above and performing such other procedures as I considered necessary in the circumstances.
- Obtain an understanding of the School's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of the School's internal control over compliance. Accordingly, no such opinion is expressed.

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

Report on Internal Control over Compliance

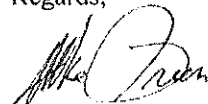
A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

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

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

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

Regards,



Michael Green, CPA
Stilwell, Oklahoma
February 10, 2026

ZION SCHOOL DISTRICT C028
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
For the Year Ended June 30, 2025

check to see if award CFDA #'s change from year to year

<u>Program</u>	<u>Federal CFDA Number</u>	<u>Expenditures</u>
<u>U.S. Department of Education</u>		
Direct Programs:		
Title VII - Part A	84.060	\$ 53,935
Impact Aid	84.041	233,765
Impact Aid, Disabled	84.041	16,045
Subpart I, Small, Rural School	84.358A	46,513
Sub Total		<u>350,258</u>
<u>Passed through State Dept. of Education:</u>		
Title I A	84.010	151,406
Title IV Part B Learning Centers (Title IVB FPO)	84.287	219,197
ARP ESSER III	84.425U	19,569
ARP ESSER III - Science of Reading	84.425U	646
Sub Total		<u>390,818</u>
Special Education Cluster:		
Special Ed Pro Development OSDE Sponsored	84.027	1,099
Preschool 3-5	84.173	2,607
Flow Through	84.027	54,681
MON Assistance Sp Ed Prof Development District	84.027	456
Early Intervening Services	84.027	1,904
Total Special Education Cluster		<u>60,746</u>
Total Passed through Oklahoma State Department of Education		<u>801,822</u>
<u>U.S. Department of the Interior</u>		
<u>Passed through BIA:</u>		
477 Cluster:		
Johnson O'Malley	15.130	<u>14,630</u>
<u>U.S. Department of Health and Human Services</u>		
Medicaid Resources	93.778	<u>3,848</u>
<u>U.S. Department of Agriculture</u>		
<u>Passed Through State Dept. of Education:</u>		
Child Nutrition Cluster:		
National School Lunch Program	10.555	164,738
School Breakfast Program	10.553	72,552
Commodities		18,686
Child Nutrition Cluster Sub Total		<u>255,976</u>
Total Federal Assistance Expenditures		<u>\$ 1,076,275</u>

Note A: Basis of Presentation - The Schedule of Expenditures of Federal Awards includes the federal grant activity of the School District and is presented on another comprehensive basis of accounting conforming with the accounting practices prescribed or permitted by the Oklahoma State Department of Education which is a comprehensive basis of accounting other than generally accepted accounting principles. Under this method, expenditures are recognized when an approved purchase order is issued.

Note B: Commodities representing non-cash expenditures have been included in the Schedule of Expenditures of Federal Awards which is an exception to the prescribed basis of accounting.

Note C: The school district did not pass federal awards through to subrecipients during the year ended June 30, 2025.

Note D: The school district provides adequate insurance coverage against loss on assets purchased with federal awards.

Note E: The school district has elected not to use the 10 % de minimus cost rate as allowed under Uniform Guidance.

The accompanying notes are an integral part of this schedule

ZION SCHOOL DISTRICT C028
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
Year Ended June 30, 2025

SECTION I - SUMMARY OF AUDITOR'S RESULTS

FINANCIAL STATEMENTS

Type of auditor's report issued:

With respect to conformity with Generally Accepted Accounting Principles	Adverse
With respect to the use of Regulatory basis of accounting and the omission of the general fixed asset group	Qualified

Internal control over financial reporting:

Material weakness(es) identified?	no
Reportable condition(s) identified not considered to be material weaknesses?	none reported
Noncompliance material to financial statements noted?	no

FEDERAL AWARDS

Internal Control over major programs:

Material weakness(es) identified?	no
Reportable condition(s) identified not considered to be material weaknesses?	none reported
Type of auditor's report issued on compliance for major programs:	unmodified
Any audit findings disclosed that are required to be reported in accordance with 2CFR 200.516(a)	none reported

The programs tested as major programs included:

	<u>CFDA#</u>
Child Nutrition Cluster	10.553, 10.555
Title I Grants to Local Education Agencies	84.010
Special Education Cluster	84.027, 84.173

The threshold for distinguishing type A and B programs was: \$750,000.

The auditee does not qualify as a low-risk auditee.

SECTION II - FINANCIAL STATEMENT FINDINGS

None reported.

SECTION III - FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

None reported.

SECTION IV - PRIOR YEAR FINDINGS AND QUESTIONED COST

None reported.

**ZION SCHOOL DISTRICT C028
SCHEDULE OF FEDERAL AWARDS
FOR THE YEAR ENDED JUNE 30, 2025**

<u>Program</u>	<u>Federal CFDA Number</u>	<u>Grantor's Number</u>	<u>Grant Award</u>	<u>Federal Grant Receipts</u>	<u>Expenditures</u>
<u>U.S. Department of Education</u>					
Direct Programs:					
Title VII - Part A	84.060	561	\$ 53,935.00	\$ 53,935.00	\$ 53,935.00
Impact Aid	84.041	591	\$ -	\$ 75,424.00	233,764.61
Impact Aid, Disabled	84.041	592	\$ -	\$ 6,898.00	16,044.85
Subpart 1, Small Rural School	84.358A	588	\$ -	\$ 46,513.24	46,513.24
	Sub Total				<u>350,257.70</u>
<i>Passed through State Dept. of Education:</i>					
Title I A	84.010	511	\$ 167,279.65	\$ 141,276.24	151,405.76
Title IV Part B Learning Centers (Title IVB FPO)	84.287	553	\$ 247,262.73	\$ 174,245.98	219,197.05
ARP ESSER III	84.425U	795	\$ -	\$ 19,569.21	19,569.21
ARP ESSER III - Science of Reading	84.425U	726		646.00	645.90
	Sub Total				<u>390,817.92</u>
Special Education Cluster:					
Special Ed Pro Development OSDE Sponsored	84.027	613	\$ 1,098.72	\$ 1,098.72	1,098.72
MON Assistance Sp Ed Prof Devlp District	84.027	615	\$ 500.00	\$ 455.97	455.97
Preschool 3-5	84.173	641	\$ 2,606.53	\$ 2,606.53	2,606.53
Flow Through	84.027	621	\$ 54,681.07	\$ 54,681.07	54,681.07
Early Intervening Services	84.027	623	\$ -	\$ 1,903.62	1,903.62
Total Special Education Cluster					<u>60,745.91</u>
Total U.S. Department of Education					<u>801,821.53</u>
<u>Passed through BIA:</u>					
Johnson O'Malley	15.130	563	\$ 15,820.00	\$ 14,549.58	14,629.76
<u>U.S. Department of Health and Human Services</u>					
Medicaid Resources	93.778	698	\$ -	\$ 18,835.69	<u>3,847.75</u>
<i>Passed Through State Dept. of Education:</i>					
Child Nutrition Cluster:					
School Lunch Pogram	10.555	763	\$ -	\$ 197,504.01	164,737.52
School Breakfast Program	10.553	764	\$ -	\$ 73,882.99	72,552.30
Commodities from DHS			\$ -	\$ -	18,685.74
	Child Nutrition Cluster Sub Total				<u>255,975.56</u>
	Total Federal Assistance Expenditures				<u>\$ 1,076,274.60</u>

Note A: Food Distribution: Nonmonetary assistance is reported in the schedule at the fair market value of the commodities received and disbursed.

Note B: This schedule was prepared on a regulatory basis of accounting consistent ith the preparation of the combined financial statements, except for the nonmonetary assistance noted in Note A.

Note C: None of the Federal grant/contracts included any loan programs, loan guarantee programs has no subrecipients and does not use the 10% de minimus cost rate.

The accompanying notes and auditor's reports are an integral part of this Schedule.

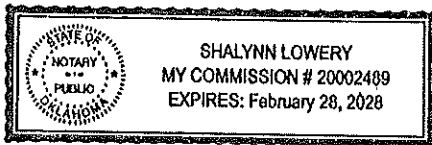
SCHEDULE OF
ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT
JULY 1, 2024 to JUNE 30, 2025

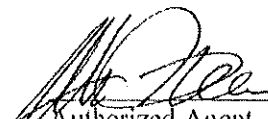
State of Oklahoma

County of Adair

The undersigned auditing firm of lawful age, being first duly sworn on oath says that said firm had in full force and effect Accountant's Professional Liability Insurance in accordance with the "Oklahoma Public School Audit Law" at the time of audit contract and during the entire audit engagement with Zion Public School for the audit year 2024-2025.

Michael Green, CPA
Auditing Firm



by  _____
Authorized Agent

Subscribed and sworn to before me this 10 day of February, 2026.


NOTARY PUBLIC (or CLERK or JUDGE)

My Commission Expires: 02-28-2028

ZION SCHOOL DISTRICT NO C-28
SCHEDULE OF STATUTORY, FIDELITY, AND HONESTY BONDS
JUNE 30, 2025

<u>Position</u>	<u>Bonded By</u>	<u>Policy Number</u>	<u>Term</u>	<u>Amount</u>
Treasurer	Western Surety Co.	71300587	7-16-24 / 7-16-25	\$100,000
Encumbrance Clerk	Western Surety Co.	14239146	7-29-24 / 7-29-25	\$1,000
Minute Clerk	Western Surety Co.	54708519	7-1-24 / 7-1-25	\$1,000
Superintendent	Western Surety Co.	72475941	7-5-24 / 7-5-25	\$100,000
Activity Fund Custodian	Western Surety Co.	54944150	7-1-24/ 7-1-25	\$5,000