

State of Minnesota



Office of the State Auditor

Julie Blaha
State Auditor

**Minnesota State High School League
Brooklyn Center, Minnesota**

Management and Compliance Report

Year Ended July 31, 2021

Description of the Office of the State Auditor

The mission of the Office of the State Auditor is to oversee local government finances for Minnesota taxpayers by helping to ensure financial integrity and accountability in local governmental financial activities.

Through financial, compliance, and special audits, the State Auditor oversees and ensures that local government funds are used for the purposes intended by law and that local governments hold themselves to the highest standards of financial accountability.

The State Auditor performs approximately 100 financial and compliance audits per year and has oversight responsibilities for over 3,300 local units of government throughout the state. The office currently maintains five divisions:

Audit Practice – conducts financial and legal compliance audits of local governments;

Government Information – collects and analyzes financial information for cities, towns, counties, and special districts;

Legal/Special Investigations – provides legal analysis and counsel to the Office and responds to outside inquiries about Minnesota local government law; as well as investigates allegations of misfeasance, malfeasance, and nonfeasance in local government;

Pension – monitors investment, financial, and actuarial reporting for Minnesota’s local public pension funds; and

Tax Increment Financing – promotes compliance and accountability in local governments’ use of tax increment financing through financial and compliance audits.

The State Auditor serves on the State Executive Council, State Board of Investment, Land Exchange Board, Public Employees Retirement Association Board, Minnesota Housing Finance Agency, and the Rural Finance Authority Board.

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Minnesota State High School League Brooklyn Center, Minnesota

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**Audit Practice Division
Office of the State Auditor
State of Minnesota**

**MINNESOTA STATE HIGH SCHOOL LEAGUE
BROOKLYN CENTER, MINNESOTA**

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**COMMUNICATION OF SIGNIFICANT DEFICIENCIES
AND/OR MATERIAL WEAKNESSES IN INTERNAL CONTROL
OVER FINANCIAL REPORTING AND OTHER MATTERS**

Board of Directors
Minnesota State High School League
Brooklyn Center, Minnesota

We have audited, in accordance with auditing standards generally accepted in the United States of America, the financial statements of the Minnesota State High School League (MSHSL) as of and for the year ended July 31, 2021, and the related notes to the financial statements, which collectively comprise the MSHSL's basic financial statements, and have issued our report thereon dated April 21, 2022. Our report includes a reference to other auditors. Other auditors audited the financial statements of Regions 3A, 6A, 7A, 8A, 7AA, and 8AA, as described in our report on the MSHSL's financial statements. This report does not include the results of other auditors' testing.

Internal Control Over Financial Reporting

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

A deficiency in internal control over financial reporting 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 combination of deficiencies, in internal control over financial reporting such that there is a reasonable possibility that a material misstatement of the MSHSL's financial statements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or combination of deficiencies, in internal control over financial reporting that is less severe than a material weakness, yet important enough to merit the attention of those charged with governance.

Our consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit, we did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses. We did identify certain deficiencies in internal control over financial reporting, described in the accompanying Schedule of Findings and Recommendations as items 2021-001 through 2021-003, that we consider to be significant deficiencies.

Other Matters

The MSHSL's written responses to the internal control findings identified in our audit have been included in the Schedule of Findings and Recommendations. We did not audit the MSHSL's responses and, accordingly, we express no opinion on them.

This communication is intended solely for the information and use of the Board of Directors, management, region committees, and others within the MSHSL, and is not intended to be, and should not be, used by anyone other than those specified parties.

/s/Julie Blaha

JULIE BLAHA
STATE AUDITOR

/s/Dianne Syverson

DIANNE SYVERSON, CPA
DEPUTY STATE AUDITOR

April 21, 2022

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**SCHEDULE OF FINDINGS AND RECOMMENDATIONS
FOR THE YEAR ENDED JULY 31, 2021**

INTERNAL CONTROL OVER FINANCIAL REPORTING

2021-001 Internal Control/Segregation of Duties – Regions

Prior Year Finding Number: 2020-001

Repeat Finding Since: 2007

Type of Finding: Internal Control Over Financial Reporting

Severity of Deficiency: Significant Deficiency

Criteria: Each region has an administrative secretary who is responsible for the accounting functions. Establishing and maintaining internal control over the various accounting cycles, the fair presentation of the financial statements and related notes, and the accuracy and completeness of all financial records and related information is the responsibility of each region secretary, each region committee, and the Minnesota State High School League (MSHSL). Adequate segregation of duties is a key internal control in an organization's accounting system.

Management of each region and the MSHSL is responsible for the accuracy and completeness of all financial records and related information. Also, management is responsible for controls over the period-end financial reporting process, including controls over procedures used to enter transaction totals into the general ledger; initiate, authorize, record, and process journal entries into the general ledger; and record recurring and nonrecurring adjustments to the financial statements.

Condition: Due to the limited number of staff, the management of Regions 1A, 2A, 4A, 5A, 1AA, 2AA, 3AA, 4AA, 5AA, and 6AA requested that the Office of the State Auditor prepare the financial statement information and related note disclosures included in the audited financial report of the MSHSL.

Context: The size of the regions and their staffing limits the internal control that management can design and implement into the organization.

Effect: Inadequate segregation of duties could adversely affect the regions' ability to detect misstatements in amounts that would be material in relation to the financial statements in a timely period by employees in the normal course of performing their assigned functions.

Cause: This arrangement is not unusual for organizations the size of the regions. This decision was based on the availability of the regions' staff and the cost benefit of using our expertise.

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**SCHEDULE OF FINDINGS AND RECOMMENDATIONS (CONTINUED)
FOR THE YEAR ENDED JULY 31, 2021**

Recommendation: We recommend each region committee and the Board and management of the MSHSL be mindful that limited staffing causes inherent risks in safeguarding the organization's assets and the proper reporting of its financial activity. We further recommend the region committees and the Board and management of the MSHSL continue to implement oversight procedures and monitor those procedures to determine if they are still effective internal controls.

View of Responsible Official: Acknowledge

Client's Response:

The segregation of duties will continue to be an issue when only one or two individuals are involved. The League's Assistant Director has reviewed oversight procedures with the Region Secretaries of each Region Committee annually, and the League office will ensure that League employees are fully aware of their responsibilities to collect, disperse, reconcile, and report region funds to each Region Committee for their official approval. Many Regions continue to ask the State Auditors to prepare their financial statements. That decision is based on the auditor's expertise and cost-benefit analysis of hiring additional staff to perform this function.

2021-002 Tournament Reports

Prior Year Finding Number: 2020-002

Repeat Finding Since: 2009

Type of Finding: Internal Control Over Financial Reporting

Severity of Deficiency: Significant Deficiency

Criteria: Tournament reports are required to be completed by the schools hosting the tournament to account for tickets sold and tournament revenue. The tournament location, activity, date, beginning and ending ticket numbers, and tickets used are to be recorded on the tournament reports. The reports are signed and submitted to the region secretaries along with the tournament revenue.

Condition: During review of the tournament revenue and reports at each of the regions, the following issues were noted:

- eight regions had tournament reports with missing beginning and ending ticket numbers or improper ticket numbers with no documented explanation;
- two regions had a tournament report that was missing or not signed;

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**SCHEDULE OF FINDINGS AND RECOMMENDATIONS (CONTINUED)
FOR THE YEAR ENDED JULY 31, 2021**

- one region had tournament revenue recorded incorrectly in the general ledger; and
- one region had tournament revenue that was not deposited in a timely manner.

Context: Many tournaments are held at numerous sites statewide and, due to COVID-19, tickets are often sold online. Tournaments are oftentimes staffed with workers who have no prior tournament experience.

Effect: Inaccurate tournament records and reporting of tournament revenue.

Cause: Tournament workers do not take the proper care to accurately record tournament activity or document the method used for the ticket sales.

Recommendation: We recommend the region secretaries more closely monitor site personnel and tournament managers to ensure that tournament reports are complete, accurate, signed, and submitted for all tournaments. If alternative methods of ticket sales are used, we recommend an explanation be included on the tournament report to support the missing or improper ticket numbers. We further recommend region personnel deposit tournament receipts in a timely manner and accurately record them in the general ledger.

View of Responsible Official: Acknowledge

Client's Response:

In fall of 2020 and winter/spring of 2021, it was recommended by government authorities and the MSHSL office that sites go "touchless" due to COVID-19. In many cases, lists of attendees replaced paper roll tickets for entry to the venues. In some cases, Regions used the school sites' "Online Ticket Application" where no hard tickets were issued, but rather tickets were on the patron's phones. Region Secretaries will be instructed to document the method used for ticket sales and to return incomplete forms to each tournament manager and to accept them only when all of the required documentation is complete, including documented explanations for the method of the ticket sales.

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**SCHEDULE OF FINDINGS AND RECOMMENDATIONS (CONTINUED)
FOR THE YEAR ENDED JULY 31, 2021**

2021-003 Expenses

Prior Year Finding Number: 2020-003

Repeat Finding Since: 2018

Type of Finding: Internal Control Over Financial Reporting

Severity of Deficiency: Significant Deficiency

Criteria: The MSHSL's Board of Directors Policy Manual and Guidelines requires the use of an approved special expense form for certain expenses that have been incurred. Among other items, the policy requires those claiming reimbursements to use the current Internal Revenue Service mileage rate, prohibits reimbursement for alcoholic beverages, and requires supporting documentation for expenses claimed.

Condition: During review of expenses paid at each of the regions, one region was identified to have no supporting documentation for monthly expense reimbursements for internet costs.

Context: Special expenses are those expenses incurred in connection with official functions of the MSHSL or assigned duties of its employees which are not reimbursable through the regular expense regulations. The MSHSL policy identifies specific expenses which are special expenses. Region committees are charged with paying expenses in accordance with MSHSL policies.

Effect: Expenses were not paid in accordance with MSHSL policy.

Cause: Region secretaries did not ensure all expenses had the proper documentation and were allowable to be paid in accordance with MSHSL policy.

Recommendation: We recommend region secretaries more closely monitor expense requests and supporting documentation before allowing these types of payments.

View of Responsible Official: Acknowledge

Client's Response:

The League office will work directly with the Region Secretaries to train and ensure that an approved special expense form is used appropriately when meals or refreshments are purchased by the Region for tournament workers and committee members. Supporting documentation must be retained and attached to all payments for these types of expenses.