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# John T. Lane and Associates, LLC

## Certified Public Accountants

219 Young Lane, Suite 2 Mount Sterling, Kentucky 40353 (859) 498-9915 www.TheLaneCPA.com

Partners: John T. Lane, CPA Joel D. Lane, CPA Member: American Institute of CPAs Kentucky Society of CPAs

#### INDEPENDENT AUDITOR'S REPORT

Board of Commissioners Sharpsburg Water District Sharpsburg, Kentucky

We have audited the accompanying financial statements of the business-type activities of the Sharpsburg Water District as of and for the year ended December 31, 2018, which comprise the District's basic financial statements as listed in the table of contents. These financial statements are the responsibility of the Sharpsburg Water District's management. Our responsibility is to an express opinion on these financial statements based on our audit.

#### Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes 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.

#### Auditor's Responsibility

Our responsibility is to express opinions on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements 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 entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

#### Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the business-type activities of the Sharpsburg Water District, as of December 31, 2018, and the respective changes in financial position and, where applicable, cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

#### Other Matters

#### Required Supplementary Information

Management has omitted the Management's Discussion and Analysis that accounting principles generally accepted in the United States of America require to be presented to supplement the basic financial statements. Such missing information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic and historical context. Our opinion on the basic financial statements is not affected by this missing information.

#### Other Information

Our audit was conducted for the purpose of forming an opinion on the financial statements that collectively comprise the Sharpsburg Water District's basic financial statements. The comparative statement of revenues and expenses is presented for purposes of additional analysis and is not a required part of the basic financial statements.

The comparative statement of revenues and expenses is the responsibility of management and was derived from and relate directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements 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 our opinion, the comparative statement of revenues and expenses and the schedule of expenditures of federal awards are fairly stated in all material respects in relation to the basic financial statements as a whole.

## Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated April 30, 2019, on our consideration of the Sharpsburg Water District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on 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 Sharpsburg Water District's internal control over financial reporting and compliance.

John T. Lane & Associates LLC

Mount Sterling, Kentucky

April 30, 2019

This report contains 14 pages.

# SHARPSBURG WATER DISTRICT Statement of Net Position Proprietary Fund December 31, 2018

# ASSETS

ASSETS	
Current Assets Cash and cash equivalents - unrestricted Cash and cash equivalents - restricted (note 7) Accounts receivable - net of allowance for doubtful accounts (note 1) Prepaid insurance	\$ 243,923 211,973 50,684 187
Total Current Assets	506,767
Noncurrent Assets Capital assets: (note 1) Plant, equipment and lines Less accumulated depreciation	7,207,492 (2,663,920)
Total Noncurrent Assets	4,543,572
Total Assets	\$ 5,050,339
LIABILITIES	
Current Liabilities    Accrued expenses    Bonds payable    Payable from restricted assets  Total Current Liabilities	\$ 49,096 44,000 45,538 138,634
Noncurrent Liabilities Bonds payable  Total Liabilities	1,178,000
NET POSITION	
Net investment in capital assets Restricted Unrestricted	3,321,572 166,435 245,698
Total Net Position	\$ 3,733,705

# SHARPSBURG WATER DISTRICT

# Statement of Revenues, Expenses and Changes in Net Position Proprietary Fund

# For the year ended December 31, 2018

Revenues	•	004 007
User fees Utility tax income	\$	801,007 19,413
•		•
Other income		13,396
Total Revenues		833,816
Expenses		
Water purchased		309,958
Salaries		195,320
Employee benefits		40,145
Office expense		33,947
Insurance		24,201
Taxes		39,196
Utilities		19,508
Miscellaneous		17,201
Contractual services		7,500
Depreciation		133,871
Supplies & repairs		47,006
Total Operating Expenses		867,853
Operating Income (Loss)		(34,037)
Nonoperating Revenues (Expenses)		
Tap fees		13,600
Interest expense		(41,715)
Interest income		170
Net Nonoperating Revenues (Expenses)		(27,945)
Change in Net Position		(61,982)
Total Net Position - beginning		3,795,687
Total Net Position - ending	\$	3,733,705

# SHARPSBURG WATER DISTRICT

# Statement of Cash Flows Proprietary Fund

# For the year ended December 31, 2018

CASH FLOWS FROM OPERATING ACTIVITIES: Operating revenues Cash paid to employees Cash paid for general and administrative expenses	\$ 836,848 (195,320) (554,911)
Net Cash provided / (used) by operating activities	86,617
CASH FLOWS FROM INVESTING ACTIVITIES: Interest earned Interest paid	170 (41,715)
Net Cash provided / (used) by investing activities	(41,545)
CASH FLOWS FROM CAPITAL AND FINANCING ACTIVITIES: Tap fees Bond payments	13,600 (42,300)
Net vash provided / (used) in capital and financing activities	(28,700)
NET INCREASE / (DECREASE) IN CASH AND CASH EQUIVALENTS	16,372
CASH AND CASH EQUIVALENTS - BEGINNING OF YEAR	439,524
CASH AND CASH EQUIVALENTS - END OF THE YEAR	\$ 455,896
RECONCILIATION OF NET CASH PROVIDED BY OPERATING ACTIVITIES: Change in Net Position Adjustments to Reconcile Change in Net Posotion to Net Cash Provided by Operating Activities:	\$ (34,037)
depreciation (increase) / decrease in accounts receivable (increase) / decrease in prepaid expenses	133,871 3,032 16
increase / (decrease) in accounts payable  Net cash provided / (used) by operating activities	\$ 86,617

## SHARPSBURG WATER DISTRICT Notes to the Financial Statements December 31, 2018

The Sharpsburg Water District is a water utility which services areas of Bath County including Sharpsburg, Bethel, Reynoldsville and parts of Nicholas County. Its sales are primarily to residential customers. The District is a corporate body set forth in Kentucky Revised Statues (KRS) 74.070 which was created in November 1961. The District began operations in 1963. The District is subject to the regulatory authority of the Kentucky Public Service Commission pursuant to KRS 278.040.

## Note 1 - Summary of Significant Accounting Policies

The accounting policies of the District conform to accounting principles generally accepted in the United States of America as applicable to governments. The following is a summary of the more significant policies.

#### The Reporting Entity

The District, for financial purposes, includes all of the funds relevant to the operations of the District. The financial statements presented herein do not include agencies which have been formed under applicable state laws or separate and distinct units of government apart from the Sharpsburg Water District.

The financial statements of the District would include those of separately administered organizations that are controlled by or dependent on the District. Control or dependence is determined on the basis of financial interdependency, selection of governing authority, designation of management, ability to significantly influence operations, accountability of fiscal matters, scope of public service, and financing relations.

Based on the foregoing criteria there are not other organizations included in these financial statements.

Depreciation Reserve Fund - Monthly transfers are required to be made into this fund in the amount of \$120. Only expenditures for capital improvements or extraordinary expenses are permitted to be paid from this fund. The required balance of the fund at December 31, 2018 was \$62,475. The District had set aside \$82,904 into this fund at December 31, 2018.

Bond and Interest Sinking Fund - Monthly transfers are required to be made into this account in an amount equal to one-sixth (1/6) of the interest becoming due on the next succeeding interest due date for all outstanding bonds and one-twelfth (1/12) of the principal of all such bonds maturing on the next succeeding due date. The required balance of the fund at December 31, 2018 was \$-0-. The District had set aside \$62,475.

#### **Enterprise Funds**

An enterprise fund distinguishes operating revenues and expenses from non-operating items. Operating revenues and expenses generally result from providing services and producing and delivering goods in connection with the Authority's principal ongoing operations. The principal operating revenues of the Authority are operating grants and tenant rental revenue. Operating expenses of the Authority include the cost of producing the revenue and services, administrative expenses, and depreciation on capital assets. All revenues and expenses not meeting this definition are reported as non-operating revenues and expenses.

Enterprise Funds are used to account for operations (a) that are financed and operated in a manner similar to private business enterprise where the intent of the governing body is that the costs (expenses, including depreciation) of providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges or (b) where the governing body has decided that periodic determination of revenues earned, expenses incurred, and/or net income is appropriate for capital maintenance, public policy, management control, accountability, or other purposes.

The accounting and financial reporting treatment applied to the District is determined by its measurement focus. The transactions of the District are accounted for on a flow of economic resources measurement focus. With this measurement focus, all assets and all liabilities associated with the operations are included on the balance sheet. Net position (i.e., total assets net of total liabilities) are segmented into invested in capital assets, net of related debt, restricted and unrestricted components. When both restricted and unrestricted resources are available for use, it is the District's policy to use restricted resources first, and then unrestricted resources as they are needed.

Sharpsburg Water District | Notes (continued) | December 31, 2018

#### Basis of Accounting

The records of the District are maintained, and the budgetary process is based on the cash basis method of accounting. Adjustments have been made to conform to the accrual basis of accounting.

#### Inventory

The cost of inventory is recorded as a disbursement at the time of payment for the purchase.

#### Cash

For purposes of the statement of cash flows, the District considers all highly liquid debt instruments purchased with a maturity of one year or less to be cash equivalents. At December 31, 2018, the carrying amount of the District's deposits was \$455,897 and the bank balance was \$459,624. Of the bank balance 100% was covered by federal deposit insurance or collateralized with securities held by the pledging financial institution's trust department or agent in the entity's name.

#### Capital Assets

Capital assets purchased are capitalized at the time of purchase. Such assets are recorded at cost. Donated assets are recorded at fair market value at the date of donation.

Depreciation of property and equipment is computed by the straight-line method based upon the estimated useful lives of the assets as follows:

ClassLifeLines and tanks50 yearsEquipment5-10 yearsComputers3 yearsMeters15 years

The District's capitalization policy is as follows: expenditures costing more than \$1,000 with an estimated useful life greater than one year are capitalized: all others are expensed.

#### **Net Position**

Net position represents the difference between assets and liabilities. Invested in capital assets- net of related debt consists of capital assets, net of accumulated depreciation, reduced by the outstanding balance of any borrowing used for the acquisition, construction or improvement of those assets. Net position is recorded as restricted when there are limitations imposed on their use by external restrictions.

#### Accounts Receivable

The receivable reflected in the statements in the amount of \$50,684 is net of allowance for uncollectibles in the amount of \$9,702.

## Use of Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the financial statements and reported amounts of revenues and expenditures during the reporting period. Actual results could differ from those estimates.

## Note 2 - Notes Payable

The amount shown in the accompanying financial statements as notes payable represents the District's future obligation to make loan payments from future revenues. At December 31, 2018, five separate loans had outstanding balances. Details of each of these issues are summarized as follows:

Note A

Lender – Rural Development Original loan amount - \$171,000 Balance of loan - \$65,000 Rate – 7.125% Principal due January 1

Interest due January and July 1

Prepayment provision - subject to payment prior to its stated maturity without penalty or premium, at any time upon ten (10) days notice.

#### Maturities Total Principal Interest Payment 2019 \$ 9,000 \$ 4,311 \$ 13,311 10,000 3,634 13,634 2020 10,000 2,921 12,921 2021 2022 11,000 2,173 13,173 2023 12,000 13,354 1,354 2024-2027 13,000 463 13,463 Total \$ 65,000 \$ 14,856 \$ 79,856

Note B Lender – Rural Development Original Loan Amount – 335,000 Balance of loan - \$174,000 Rate - 5% Principal due January 1

Interest due January and July 1

Prepayment provision - subject to payment prior to its stated maturity without penalty or premium, at any time upon ten (10) days notice.

Maturities						
						Total
	<u>P</u>	rincipal	Ir	nterest	Р	ayment
2019	\$	11,000	\$	8,425	\$	19,425
2020		11,000		7,875		18,875
2021		12,000		7,300		19,300
2022		13,000		6,675		19,675
2023		13,000		2,025		15,025
2024-2028		77,000		19,225		96,225
2029-2030		37,000	_	1,875		38,875
Total	\$	174,000	\$	53,400	\$ :	227,400

Note C Lender – Rural Development Original loan amount - \$289,000 Balance of loan - \$187,500 Rate – 4.5% Principal due January 1 Interest due January 1 and July 1

Prepayment provision - subject to payment prior to its stated maturity without penalty or premium, at any time upon ten (10) days notice.

Maturities						
						Total
	<u>P</u>	rincipal	<u>Ir</u>	nterest	_P	ayment
2019	\$	7,500	\$	8,269	\$	15,769
2020		7,900		7,922		15,822
2021		8,300		7,558		15,858
2022		8,600		7,178		15,778
2023		9,000		6,782		15,782
2024-2028		51,600	:	27,293		78,893
2029-2033		64,300		14,299		78,599
2034-2035		30,300		1,384	_	31,684
Total	\$ 1	187,500	\$	80,685	\$ 2	268,185

Sharpsburg Water District | Notes (continued) | December 31, 2018

Note D

Lender - Rural Development Original loan amount - \$258,000

Balance of loan - \$221,000

Rate - 4.125%

Principal due January 1

Interest due January 1 and July 1

Prepayment provision - subject to payment prior to its stated maturity without penalty or premium, at any time upon ten (10) days notice.

Maturities						
						Total
	Principal		<u>lr</u>	nterest	<u>P</u>	ayment
2019	\$	4,500	\$	9,023	\$	13,523
2020		4,500		8,838		13,338
2021		5,000		8,642		13,642
2022		5,000		8,436		13,436
2023		5,000		8,229		13,229
2024-2028		29,500		37,692		67,192
2029-2033		37,000		30,834		67,834
2034-2038		46,000		22,316		68,316
2039-2043		57,500		11,705		69,205
2044-2045		27,000		1,134		28,134
Total	\$ :	221,000	\$ 1	146,849	\$ :	367,849

Note E Lender - Rural Development Original loan amount - \$642,000 Balance of loan - \$574,500 Rate - 2.250%

Principal due January 1

Interest due January 1 and July 1

Prepayment provision - subject to payment prior to its stated maturity without penalty or premium, at any time upon ten (10) days notice.

Maturities						
			Total			
	Principal	Interest	Payment			
2019	\$ 12,000	\$ 12,791	\$ 24,791			
2020	12,500	12,516	25,016			
2021	13,000	12,229	25,229			
2022	13,000	11,936	24,936			
2023	13,500	11,638	25,138			
2024-2028	71,500	53,488	124,988			
2029-2033	81,000	44,910	125,910			
2034-2038	91,000	35,235	126,235			
2039-2043	102,500	24,384	126,884			
2044-2048	115,000	12,150	127,150			
2049-2050	49,500	1,119	50,619			
Total	\$ 574,500	\$ 232,396	\$ 806,896			

The following is a summary of changes in long-term obligations for the year:

	Outstanding				Due Within
	1/1/2018	Issued	Retired	12/31/2018	One Year
Rural Development	\$ 1,264,300	\$ -	\$ 42,300	\$ 1,222,000	\$ 44,000

Total interest paid during the year on long-term debt totaled \$45,721.

Sharpsburg Water District | Notes (continued) | December 31, 2018

#### Note 3 - Pension Plan

The District's employees are not covered by a retirement plan.

#### Note 4 - Leave Policies

Annual and Sick Leave

All full time employees shall be entitled to sick leave with pay at a rate of twelve days per year. Maximum accumulation is 60 days. No pay upon termination.

All full time employees are entitled to vacation time as follows:

Completion of one year - 1 week

Completion of ten years - 2 weeks

Completion of 15 years - 3 weeks

Completion of 20+ years - 4 weeks

# Note 5 - Changes in Capital Assets

The following is a summary of changes in the capital assets for the year:

,	Balance Transfers/ 1/1/2018 Additions		Deletions	Balance 12/31/2018		
Utility plant and equipment	\$ 7,207,492	\$ -	\$ -	\$ 7,207,492		
Accumulated depreciation	\$ 2,530,049	\$ 133,871	\$ -	\$ 2,663,920		
Capital assets, net of accumulated depreciation	\$ 4,677,443	\$ 133,871	\$ -	<b>\$</b> 4,543,572		

#### Note 6 - Revenue Bonds

Water and Revenue Bonds constitute special obligations of the District solely secured by a lien on and pledge of the net revenues of the water system. The revenue bonds are collateralized by the revenue of the water system and the various special funds established by the bond ordinances. The ordinances provide that the revenue of the system is to be used first to pay operating and maintenance expenses of the system and second to establish and maintain the revenue bond funds. Any remaining revenues may then be used for any lawful purpose. The ordinances also contain certain provisions, which require the District to maintain pledged revenues. The District must transfer monthly 1/6 of the next succeeding interest payment and 1/12 of the next succeeding principal payment from the operations and maintenance account into the bond and interest sinking account.

#### Note 7 - Restricted Cash

Restricted cash is composed of the following:

Depreciation reserve fund	\$	82,904
Sinking fund		80,497
Water Meter	<u></u>	48,572
	\$	211,973

# Note 8 – Contingencies

The District is subject to possible examinations made by Federal and State authorities who determine compliance with terms, conditions, laws, and regulations governing other grants given to the District in the current and prior years. There were no examinations for the year ended December 31, 2018. Areas of noncompliance, if any, as a result of examinations would be included as a part of the *Schedule of Findings* section of this report.

## Note 9 - Risk Management

The District is exposed to various risks of losses related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; and natural disasters. The District carries commercial insurance coverage for the risks to the extent deemed prudent by District management.



# John T. Lane and Associates, LLC

## Certified Public Accountants

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Partners: John T. Lane, CPA Joel D. Lane, CPA Member: American Institute of CPAs Kentucky Society of CPAs

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

Board of Commissioners Sharpsburg Water District Sharpsburg, Kentucky

We have audited, in accordance with the 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 financial statements of the business-type activities of the Sharpsburg Water District, as of and for the year ended December 31, 2018, and the related notes to the financial statements, which collectively comprise the Sharpsburg Water District's basic financial statements, and have issued our report thereon dated April 30, 2019.

# **Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements, we considered Sharpsburg Water District's internal control over financial reporting (internal control) to determine the 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 Sharpsburg Water District's internal control. Accordingly, we do not express an opinion on the effectiveness of Sharpsburg Water District'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.

Our 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 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 that we consider to be material weaknesses. We did identify a certain deficiency in internal control, described in the accompanying schedule of findings and responses that we consider to be a significant deficiency. [2018-001]

# **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether Sharpsburg Water District's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed 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 our 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 internal 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.

John T. Lane & Associates LLC

Mount Sterling, Kentucky

April 30, 2019

# SHARPSBURG WATER DISTRICT COMPARATIVE STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION For the years ended December 31, 2017 and December 31, 2018

_		2017		2018
Revenues	_		_	
User fees	\$	778,218	\$	801,007
Utility tax		22,647		19,413
Miscellaneous		18,793		13,396
Total Revenues		819,658		833,816
Expenses				
Water purchased		349,813		309,958
Salaries		194,700		195,320
Employee benefits		38,907		40,145
Office expense		36,445		33,947
Insurance		22,534		24,201
Taxes		39,166		39,196
Utilities		18,709		19,508
Miscellaneous		20,197		17,201
Contractual services		6,000		7,500
Depreciation		133,872		133,871
Supplies & repairs		31,831		47,006
Total Operating Expenses		892,174		867,853
Operating Income (Loss)		(72,516)		(34,037)
Nonoperating Revenues (Expenses)				
Tap fees		12,750		13,600
Interest expense		(45,721)		(41,715)
Interest income		158		170
Net Nonoperating Revenues (Expenses)		(32,813)		(27,945)
Change in Net Position	\$	(105,329)	\$	(61,982)

# SHARPSBURG WATER DISTRICT FINDINGS AND RESPONSES December 31, 2018

#### PRIOR FINDINGS

2017-001: Segregation of Duties - Repeated as 2018-001

# **CURRENT FINDINGS**

2018-001: Lack of Segregation of Duties

Condition: The District has an inadequate segregation of duties within its internal control process.

Criteria: All governmental entities should design their internal control to provide an adequate segregation of duties.

Cause: The District does not have sufficient employees to adequately design its internal control.

Recommendation: The District should continue to design and implement its internal control policies to provide the maximum

segregation of duties possible.

Response: We will do as recommended.