KIRKSVILLE WATER ASSOCIATION, INC. RICHMOND, KENTUCKY

AUDITED FINANCIAL STATEMENTS AND INDEPENDENT AUDITORS' REPORT FOR THE YEARS ENDED DECEMBER 31, 2018 AND 2017



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INDEPENDENT AUDITORS' REPORT

To the Board of Directors Kirksville Water Association, Inc. Richmond, Kentucky

Report on the Financial Statements

We have audited the accompanying financial statements of Kirksville Water Association, Inc. (a nonprofit organization), which comprise the statements of financial position as of December 31, 2018 and 2017, and the related statements of activities, changes in net assets and cash flows for the years then ended, and the related notes to the financial statements.

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 an opinion on these financial statements based on our audits. 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 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 financial position of Kirksville Water Association, Inc. as of December 31, 2018 and 2017, and the changes in its net assets and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Change in Accounting Principle

As discussed in Note 2 to the financial statements, in the year ended December 31, 2018, the Organization adopted new accounting guidance, ASU 2016-14- Not-For-Profit Entities (Topic 958): Presentation of Financial Statements of Not-For-Profit Entities. Our opinion is not modified with respect to this matter.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated February 15, 2019 on our consideration of Kirksville Water Association, Inc.'s internal control over financial reporting and 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 Kirksville Water Association, Inc.'s internal control over financial reporting and compliance.

Craft, Noble & Company, PLLC

Craft, Noble & Company, PLLC Richmond, Kentucky February 15, 2019

KIRKSVILLE WATER ASSOCIATION, INC. STATEMENTS OF FINANCIAL POSITION DECEMBER 31, 2018 AND 2017

ASSETS

	<u>2018</u>		<u>2017</u>
CURRENT ASSETS			
Cash on hand	\$	220	\$ 220
Cash - operating accounts		253,026	134,447
Certificate of deposit		178,127	175,403
Accounts receivable - trade		75,733	70,496
Inventory		37,953	27,812
Prepaid expenses		7,296	 8,567
Total Current Assets		552,355	416,945
TEMPORARILY RESTRICTED ASSETS			
Reserve accounts			
Sinking fund - Rural Development		12,559	13,636
Sinking fund - Kentucky Rural Water Finance Corporation		51,993	51,958
Reserve account		20,000	20,000
Customer deposits - cash		1,365	 1,006
Total Temporarily Restricted Assets		85,917	 86,600
FIXED ASSETS			
Property, Plant and Equipment		5,985,285	5,970,053
Less accumulated depreciation		(3,236,816)	 (3,068,046)
Fixed Assets - Net		2,748,469	 2,902,007
OTHER ASSETS			
Loan Costs, net of amortization		19,431	 20,403
TOTAL ASSETS	\$	3,406,172	\$ 3,425,955

KIRKSVILLE WATER ASSOCIATION, INC. STATEMENTS OF FINANCIAL POSITION DECEMBER 31, 2018 AND 2017

LIABILITIES AND NET ASSETS

	<u>2018</u>		<u>2017</u>	
CURRENT LIABILITIES				
Current portion of long-term debt	\$	42,263	\$	41,947
Accounts payable		37,748		32,670
Accrued interest payable		18,990		19,618
Customer deposits		16,799		17,894
Total Current Liabilities		115,800		112,129
LONG-TERM DEBT: LESS CURRENT PORTION				
1994 Note payable - Rural development		55,523		58,092
1999 Note payable - Rural development		79,540		81,541
2004 Note payable - Rural development		82,289		84,057
2004 Note payable - Rural development		56,733		58,009
Kentucky Rural Water Finance Corporation		505,000		540,000
Total Long-Term Debt		779,085		821,699
Total Liabilities		894,885		933,828
NET ASSETS				
Without donor restriction		2,425,370		2,405,527
With donor restriction		85,917		86,600
Total Net Assets		2,511,287		2,492,127
TOTAL LIABILITIES AND NET ASSETS	\$	3,406,172	\$	3,425,955

KIRKSVILLE WATER ASSOCIATION, INC. STATEMENTS OF ACTIVITIES FOR THE YEARS ENDED DECEMBER 31, 2018 AND 2017

	<u>2018</u>			<u>2017</u>
CHANGES IN NET ASSETS WITHOUT DONOR RESTRICTION:				
Revenues and gains:				
Sale of water	\$	903,877	\$	875,108
Fees and charges		46,825		56,242
Interest income		3,440		2,222
Miscellaneous income		3,434		1,200
Total revenues without donor restictions		957,576		934,772
Net assets released from restriction:				
Satisfaction of program restrictions		683		-
Total revenues, and other support without donor restriction		958,259		934,772
Expenses:				
Program				
Water purchased		401,951		344,265
Personnel		112,592		132,767
Insurance		18,159		24,465
Postage		10,163		9,571
Plant utilities		16,364		16,164
Commissioner fees		18,600		18,600
Taxes		793		2,000
Telephone		1,560		1,590
Supplies		5,748		9,468
Legal, professional and clerical services		77,345		78,038
Miscellaneous expense		8,379		5,680
Public service commission assessment		1,818		1,850
Repairs and maintenance		30,951		43,829
Travel		25,251		26,894
Bank charges		6,861		5,798
Interest on long-term debt		32,140		32,629
Depreciation and amortization		169,741		165,531
Total program expenses		938,416		919,139
Total Expenses		938,416		919,139
Increase in net assets without donor restrictions		19,843		15,633
CHANGES IN NET ASSETS WITH DONOR RESTRICTION:				
Contributions		_		564
Net assets released from restriction		(683)		_
Decrease in net assets with donor restrictions		(683)		564
Change in net assets		19,160		16,197
Net assets at beginning of year	-	2,492,127	-	2,475,930
Net assets at end of year	•	2,511,287	\$	
incl assets at city of year	\$	2,311,20/	D	2,492,127

The accompanying notes are an integral part of these financial statements.

KIRKSVILLE WATER ASSOCIATION, INC. STATEMENTS OF CHANGES IN NET ASSETS FOR THE YEARS ENDED DECEMBER 31, 2018 AND 2017

	hout Donor estrictions	h Donor trictions	Total
Beginning balance, January 1, 2017	\$ 2,389,894	\$ 86,036	\$ 2,475,930
Total revenues and gains	934,772	564	935,336
Total expenses and losses	(919,139)	-	(919,139)
Net assets released from restriction			
Ending balance, December 31, 2017	\$ 2,405,527	\$ 86,600	\$ 2,492,127
	hout Donor	h Donor trictions	Total
Beginning balance, January 1, 2018	\$ 2,405,527	\$ 86,600	\$ 2,492,127
Total revenues and gains	957,576	-	957,576
Total expenses and losses	(938,416)	-	(938,416)
Net assets released from restriction	 683	 (683)	 <u>-</u>
Ending balance, December 31, 2018	\$ 2,425,370	\$ 85,917	\$ 2,511,287

KIRKSVILLE WATER ASSOCIATION, INC. STATEMENTS OF CASH FLOWS FOR THE YEARS ENDED DECEMBER 31, 2018 AND 2017

		<u>2018</u>		<u>2017</u>
Cash flows from operating activities:				
Change in net assets	\$	19,160	\$	16,197
Adjustments to reconcile change in net assets to net cash used by				
operating activities:				
Depreciation and amortization		169,742		165,531
(Increase) decrease in accounts receivable		(5,237)		22,582
(Increase) decrease in inventory		(10,141)		31,826
(Increase) decrease in prepaid expenses		1,271		4,006
(Increase) decrease in sinking funds		1,042		(2,613)
(Increase) decrease in customer deposits- cash		(359)		2,049
Increase (decrease) in accounts payable and accruals		4,450		(6,926)
Increase (decrease) in customer deposits		(1,095)		(990)
Net cash provided by operating activities		178,833		231,662
Cash flows from investing activities:				
(Increase) in certificate of deposit		(2,724)		(2,021)
Payment for purchase of fixed assets (net of disposals)		(15,232)		(183,806)
Net cash (used) by investing activities		(17,956)		(185,827)
Cash flows from financing activities:		(42.200)		(22 221)
Payments on long-term debt		(42,298)		(32,331)
Net cash (used) by financing activities		(42,298)		(32,331)
Net increase in cash and cash equivalents		118,579		13,504
Cash and cash equivalents at beginning of year		134,667		121,163
Cash and cash equivalents at end of year	\$	253,246	\$	134,667
Cash paid during the year for:	.	22 = 42	<i>c</i>	24.000
Interest	\$	32,768	\$	34,089

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Nature of Activities

Kirksville Water Association, Inc. is a non-profit organization exempt from income tax under Section 501 (c)(12) of the U. S. Internal Revenue Code. The Organization was formed to provide water to rural parts of Madison County, Kentucky not being served by other water districts.

Basis of Accounting

The financial statements of Kirksville Water Association, Inc. are prepared on the accrual basis whereby revenues are recognized when earned and expenditures are recognized when incurred.

Basis of Presentation

Financial statement presentation follows the recommendations of the Financial Accounting Standards Board in its Accounting Standards Codification FASB ASC 958, "Financial Statements of Not-For-Profit Organizations" with the amendments of FASB ASU 2016-14 "Presentation of Financial Statements of Not-for-Profit Entities." Under FASB ASC 958 and ASU 2016-14, the Organization is required to report information regarding its financial position and activities according to two classes of net assets: net assets without donor restriction and net assets with donor restriction.

Accounts Receivable - Trade

The Organization bills customers monthly. The net accounts receivable at December 31, 2018 and 2017 was \$75,733 and \$70,496, respectively. The Organization uses the allowance for doubtful accounts method to account for bad debt expense based on the aging of the receivables. The allowance for doubtful accounts was \$32,295 and \$24,059 at December 31, 2018 and 2017, respectively.

Property, Plant and Equipment

Property and equipment are stated at cost. When assets are retired or otherwise disposed of, the cost and related accumulated depreciation are removed from the accounts and any resulting gain or loss is reflected in income for that period. The cost of maintenance and repairs is charged to expense as incurred; significant renewals and betterments are capitalized. Depreciation is recorded on a straight-line basis over the estimated useful lives of the assets. The major classes of assets are the distribution pipelines, water towers, meters and fittings, pump stations and small equipment.

<u>Inventory</u>

Inventory consists principally of water meters, fittings, service and main pipeline, and is recorded at the lower of cost or market on the first-in, first-out method.

Cash Equivalents

Cash equivalents consist of short-term, highly liquid investments which are readily convertible into cash within ninety (90) days of purchase.

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Concentrations

The Organization purchases all water for resale from the City of Richmond.

Income Taxes

The Financial Accounting Standards Board (FASB) has issued (ASC 740-10), Accounting for Uncertainty in Income Taxes, which requires entities to disclose known or anticipated positions of income tax uncertainty. The Organization is not aware of any uncertain income tax positions as of February 15, 2019. The Organization has never been audited by the Internal Revenue Service (IRS), however, the tax years of 2015 forward could be subject to examination by the IRS or other applicable tax jurisdictions.

Estimates

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

NOTE 2 – CHANGE IN ACCOUNTING PRINCIPLE

The Organization adopted ASU 2016-14- Not-For-Profit Entities (Topic 958): Presentation of Financial Statements of Not-For-Profit Entities, for the year ended December 31, 2018. This guidance changes how not-for-profit entities present and disclose their financial statements. It is designed to improve the information provided by not-for-profit entities for better understanding of their operations.

NOTE 3 – FAIR VALUE MEASUREMENTS

FASB issued FASB ASC 820, Fair Value Measurements and Disclosures in order to establish a single definition of fair value and a framework for measuring fair value in Generally Accepted Accounting Principles (GAAP) that is intended to result in increased consistency and comparability in fair value measurements. FASB ASC 820 also expands disclosures about fair value measurements. FASB ASC 820 applies whenever other authoritative literature requires (or permits) certain assets or liabilities to be measured for fair value, but does not expand the use of fair value.

FASB ASC 820 defines fair value as the exchange price that would be received on the measurement date to sell an asset or the price paid to transfer a liability in the principal or most advantageous market available to the entity in an orderly transaction between participants. FASB ASC 820 also establishes a three level fair value hierarchy that describes the inputs that are used to measure assets and liabilities.

Level 1 – Asset and liability fair values are based on quoted prices in active markets for identical assets and liabilities.

Level 2 – Asset and liability fair values are based on observable inputs that include quoted market prices for similar assets or liabilities; quoted market prices that are not in an active market; or other inputs that are observable in the market and can be corroborated by observable market data for substantially the full term of the assets and liabilities. Level 2 assets and liabilities include certificates of deposit.

NOTE 3 – FAIR VALUE MEASUREMENTS

Level 3 – Assets and liabilities are financial instruments whose value is calculated by the use of pricing models and/or discounted cash flow methodologies, as well as financial instruments for which the determination of fair value requires significant management judgment or estimation. These methodologies may result in a significant portion of the fair value being derived from unobservable data.

The following table presents the fair value measurements of assets and liabilities recognized in the accompanying statements of financial position measured at fair value on a recurring basis and the level within the FASB ASC 820 fair value hierarchy in which the fair value measurements fall at December 31, 2018 and 2017:

December 31, 2017	<u>Fair Value</u>	Quoted Prices in Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
Certificate of deposit Total	\$ 175,403 \$ 175,403	\$ - \$ -	\$ 175,403 \$ 175,403	\$ - \$ -
December 21, 2019	<u>Fair Value</u>	Quoted Prices in Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
December 31, 2018 Certificate of deposit Total	\$ 178,127 \$ 178,127	<u>\$</u>	\$ 178,127 \$ 178,127	<u>\$</u> -

Fair values are estimated based on stated interest rates of the certificates of deposit.

NOTE 4 – UTILITY PLANT

At December 31, 2018 and 2017, the cost and accumulated depreciation of fixed assets were as follows:

	<u>2018</u>		<u>2017</u>
Utility plant	\$ 5,899,950	\$	5,885,168
Furniture and fixtures	7,687		7,687
Construction-in-progress	-		-
Equipment	 77,648		77,198
Total	5,985,285		5,970,053
Accumulated depreciation	 (3,236,816)		(3,068,046)
Net fixed assets	\$ 2,748,469	\$	2,902,007

NOTE 5 – LONG-TERM DEBT

In April 1994, the Organization borrowed \$93,500 from Rural Development. The note, dated April 1, 1994, bears interest at 4.5% and is for a forty (40) year term. The loan document required interest-only payment for 1995 and 1996 and annual payments thereafter in the amount of \$5,181 due each April 1.

NOTE 5 – LONG-TERM DEBT (CONTINUED)

The Organization borrowed \$102,300 from Rural Development. This note is dated February 11, 1999 and bears an interest rate of 4.5%. Annual payments of \$5,669 began February 2003.

In May 2004, the Organization borrowed \$100,000 from Rural Development. The loan has an interest rate of 4.375%. Annual payments of \$5,445 began May 2005.

In May 2004, the Organization borrowed \$70,000 from Rural Development. The loan has an interest rate of 4.375%. Annual payments of \$3,812 began May 2005.

In December 2012, the Organization borrowed \$725,000 from Kentucky Rural Water Finance Corporation. The loan carries and average interest rate of 3.573%. Monthly payments range between \$710 and \$6,161 and matures in January 2039.

All notes are collateralized by the assets of the Organization.

The principal repayment requirements at December 31, relating to the above notes payable are as follows:

	<u>2018</u>	<u>2017</u>
2018	\$ -	\$ 41,947
2019	42,263	42,263
2020	42,593	42,593
2021	42,937	42,937
2022	47,881	47,881
2023	48,675	-
Later Years	 596,999	 646,025
TOTAL	\$ 821,348	\$ 863,646

NOTE 6 – TAP ON FEES

The Organization requires new customers obtaining services from the existing system to pay a tap on fee. The fee ranges from \$1,156-\$1,420 depending on the size of the pipe required. The Organization received \$14,445 and \$24,020 from their customers for such fees and for the year ending December 31, 2018 and 2017, respectively.

NOTE 7 - RISK MANAGEMENT

The Organization is exposed to various risks of loss related to torts, theft of, damage to, and destruction of assets, errors and omissions, injuries to employees, and natural disasters. In addition to its general liability insurance, the Organization also carries commercial insurance for all other risks of losses such as workers' compensation. Settled claims resulting from these risks have not exceeded commercial insurance coverage in any of the past four fiscal years.

NOTE 8 - NET ASSETS WITH DONOR RESTRICTION

Sinking fund – Rural Development: The Organization periodically transfers funds from the operating account to the Sinking fund to pay the Rural Development notes. The sinking fund is also used to fund the Rural Development reserve requirement.

NOTE 8 – NET ASSETS WITH DONOR RESTRICTION (CONTINUED)

Sinking fund – Kentucky Rural Water Finance Corporation: The Organization transfers payments monthly from the operating account to this fund to pay the debt service on the KRWFC note.

Reserve account: The Organization treats a portion of their certificates of deposit and a portion of their operating cash as part of the reserve account. The organization allocates funds monthly into reserve to cover the note payments. At December 31, 2018 and 2017 the reserve fund was sufficiently funded.

Customer deposits account: The Organization uses this account to account for customer deposits for water service and to refund customers who leave the Organization.

Net assets with donor restrictions are restricted for the following purposes:

	2018	<u>2017</u>
Subject to expenditure for specified purposes:		
Sinking fund- Rural Development	\$ 12,559	\$ 13,636
Sinking fund- Kentucky Rural Water Finance Corporation	51,993	51,958
Reserve account	20,000	20,000
Customer deposit account	1,365	1,006
Total net assets with donor restriction	\$ 85,917	\$ 86,600

NOTE 9 – LIQUIDITY AND AVAILABLITY

The Organization's financial assets are available within one year of the balance sheet date for general expenditures as follows:

	<u>2018</u>	<u>2017</u>
Cash in hand	\$ 220	\$ 220
Cash- operating accounts	253,026	134,447
Certificate of deposit	178,127	175,403
Accounts receivable	75,733	70,496
	\$ 507,106	\$ 380,566

NOTE 10 - FINANCIAL STATEMENT RECLASSIFICATIONS

Certain amounts presented in the 2017 financial statements have been reclassified to conform to the current year presentation of the financial statements in accordance with ASU 2016.14. These reclassifications did not affect the change in net assets or alter the beginning or ending net assets of the Organization.

NOTE 11 – SUBSEQUENT EVENTS

Management of the Organization has considered subsequent events through February 15, 2019, the date this report becomes available for issue.

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

To the Board of Commissioners of Kirksville Water Association, Inc. Richmond, Kentucky

We have audited, in accordance with the auditing standards generally accepted in the United State 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 Kirksville Water Association, Inc. (a non-profit organization) which comprise the statement of financial position as of December 31, 2018, and the related statements of activities, and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated February 15, 2019.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered Kirksville Water Association's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Kirksville Water Association's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Organization's internal control over financial reporting.

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 the 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. We did identify certain deficiencies in internal control, described in the accompanying schedule of findings and questioned costs that we consider to be material weaknesses (2018-01).



Compliance and Other Matters

As part of obtaining reasonable assurance about whether Kirksville Water Association's financial statements are free of 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 that are required to be reported under *Government Auditing Standards*.

Kirksville Water Association, Inc.'s Response to Findings

Kirksville Water Association, Inc.'s response to the findings identified in our audit is described in the accompanying schedule of findings and responses. Kirksville Water Association, Inc.'s response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

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 organization'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 organization's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Craft, Noble & Company, PLLC

Craft, Noble & Company, PLLC Richmond, KY February 15, 2019

KIRKSVILLE WATER ASSOCIATION, INC. SCHEDULE OF FINDINGS AND RESPONSES FOR THE YEAR ENDED DECEMBER 31, 2018

FINDINGS- FINANCIAL STATEMENT AUDIT

2018-1

Criteria:

As discussed in *Standards for Internal Control in the Federal Government* published by the General Accounting Office of the United States, internal control is an integral component of an organization's management that provides reasonable assurance that an objective of the separation of duties is being achieved. Organizations should implement procedures to ensure this objective is achieved.

Condition:

During the audit procedures performed, instances of this objective not being completely achieved were noted.

Cause:

The Organization does not have a large enough staff to obtain the adequate separation of duties that would help detect and prevent fraud, waste, and abuse in the entity.

Effect:

The lack of the separation of duties is a preventive measure. The addition of the separation of duties would lead to a decreased risk for fraud and other activities which could lead to financial statements that are materially misstated.

Organization Response and Corrective Action Plan:

It does not appear that it would be economically feasible for our Organization to enlarge our staff to obtain the requested separation of duties. Thus, it is important that our Board provide oversight and independent review functions.