

**MANAGEMENT COMMUNICATIONS**

**CITY OF WEST ALLIS, WISCONSIN**

**DECEMBER 31, 2013**

**CITY OF WEST ALLIS, WISCONSIN**  
December 31, 2013

TABLE OF CONTENTS

	<u>Page No.</u>
COMMUNICATION TO THE CITY COUNCIL	1 - 3
SUMMARY FINANCIAL INFORMATION	
1. Governmental Fund Balances	4 - 5
2. Water Utility	6
3. Sanitary Sewer Utility	7
4. Storm Water Utility	8
COMMENTS AND OBSERVATIONS	
1. Fair Value of Investments	9
2. New Single Audit Requirements	9 - 10
APPENDIX	
Management Representation Letter	



To the Honorable Mayor and City Council  
City of West Allis, Wisconsin

We have completed our audit of the basic financial statements of the City of West Allis, Wisconsin (the "City") for the year ended December 31, 2013. The City's financial statements, including our report thereon dated June 24, 2014, are presented in a separate audit report document. Professional standards require that we provide you with the following information related to our audit.

#### Our Responsibilities Under U.S. Generally Accepted Auditing Standards

As stated in our engagement letter, our responsibility, as described by professional standards, is to plan and perform our audit to obtain reasonable, but not absolute, assurance that the financial statements are free of material misstatement and are fairly presented in accordance with accounting principles generally accepted in the United States of America. Because an audit is designed to provide reasonable, but not absolute, assurance and because we did not perform a detailed examination of all transactions, there is a risk that material errors, fraud, noncompliance with the provisions of laws, regulations, contracts and grants or other illegal acts may exist and not be detected by us.

In planning and performing our audit, we considered the City's internal control over financial reporting in order to determine our auditing procedures for the purpose of expressing our opinions on the financial statements and not to provide assurance on the internal control over financial reporting. We also considered internal control over compliance with requirements that could have a direct and material effect on major federal and state programs in order to determine our auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with OMB Circular A-133 and the *State Single Audit Guidelines*.

As part of obtaining reasonable assurance about whether the City's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grants, 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. Also in accordance with OMB Circular A-133 and the *State Single Audit Guidelines*, we examined, on a test basis, evidence about the City's compliance with the types of compliance requirements described in the "U.S. Office of Management and Budget (OMB) Circular A-133 Compliance Supplement" and the *State Single Audit Guidelines* applicable to each of its major federal and state programs for the purpose of expressing an opinion on the City's compliance with those requirements. While our audit provides a reasonable basis for our opinion, it does not provide a legal determination on the City's compliance with those requirements.

#### Planned Scope and Timing of the Audit

We performed the audit according to the planned scope and timing previously communicated to you in our correspondence about planning matters.

## Significant Audit Findings

### *Consideration of Internal Control*

In planning and performing our audit of the financial statements of the City as of and for the year ended December 31, 2013, in accordance with auditing standards generally accepted in the United States of America, we considered the City's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the City's internal control. Accordingly, we do not express an opinion on the effectiveness of the City's internal control. Our report on internal control over financial reporting and on compliance and other matters is presented on pages 133 - 134 of the annual report.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be significant deficiencies or material weaknesses and therefore there can be no assurance that all such deficiencies have been identified.

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 financial statements will not be prevented, or detected and corrected on a timely basis. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses.

### *Qualitative Aspects of Accounting Practices*

Management is responsible for the selection and use of appropriate accounting policies. In accordance with the terms of our engagement letter, we will advise management about the appropriateness of accounting policies and their application. The significant accounting policies used by the City are described in Note A to the financial statements. No new accounting policies were adopted and the application of existing policies was not changed during 2013. We noted no significant transactions entered into by the City during the year for which there is a lack of authoritative guidance or consensus. To the best of our knowledge, all significant transactions have been recognized in the financial statements in the proper period.

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

Management's estimate of the other post-employment benefits is based on an actuarial report. We evaluated the key factors and assumptions used to develop the other post-employment benefits in determining that it is reasonable in relation to the financial statements taken as a whole.

Management's estimate of the depreciable life of the capital assets is based upon analysis of the expected useful life of the capital assets. We evaluated the key factors and assumptions and the consistency in these factors and assumptions used to develop the depreciable life in determining that it is reasonable in relation to the financial statements taken as a whole.

Management's estimate of the incurred, but not reported (IBNR) insurance reserves are based on actuarial projections of the expected cost of the ultimate settlement and administration of claims. We evaluated the key factors and assumptions used to develop the reserves in determining that it is reasonable in relation to the financial statements taken as a whole.

### *Difficulties Encountered in Performing the Audit*

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

### *Corrected and Uncorrected Misstatements*

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are trivial, and communicate them to the appropriate level of management. The financial statements reflect all accounting adjustments proposed during our audit. The adjustments included various end of year payable, receivable and reclassification entries. These entries are considered routine in nature and normally do not vary significantly from year to year. Copies of the audit adjustments are available from management.

### *Disagreements with Management*

For purposes of this letter, professional standards define a disagreement with management as a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditors' report. No such disagreements arose during the course of our audit.

### *Management Representations*

We have requested certain representations from management that are included in the management representation letter dated June 24, 2014. The management representation letter follows this communication.

### *Management Consultations with Other Independent Accountants*

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

### *Other Audit Findings or Issues*

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to conducting the audit. These discussions occurred in the normal course of our professional relationship and, to the best of our knowledge, our responses were not a condition to our retention.

In addition, during our audit, we noted certain other matters that are presented for your consideration. We will review the status of these comments during our next audit engagement. Our comments and recommendations are intended to improve the internal control or result in other operating efficiencies. We will be pleased to discuss these matters in further detail at your convenience, perform any additional study of these matters, or assist you in implementing the recommendations. Our comments are summarized in the comments and observations section of this report.

This communication, which does not affect our report dated June 24, 2014 on the financial statements of the City, is intended solely for the information and use of the City Council, management, and others within the City, and is not intended to be and should not be used by anyone other than these specified parties.

Sincerely,



Certified Public Accountants  
Green Bay, Wisconsin  
June 24, 2014

## SUMMARY FINANCIAL INFORMATION

### 1. Governmental Fund Balances

Presented below is a summary of the various City governmental fund balances on December 31, 2013, including a comparison to the prior year. This information is presented for assisting management in assessing financial results for 2013 and for indicating financial resources available for the start of the 2014 budget year.

	12/31/13	12/31/12
General Fund		
Nonspendable		
Inventories and prepaid items	\$ 1,192,946	\$ 1,241,675
Long-term receivables	7,165,451	7,460,031
Committed		
Subsequent year's budget	1,525,181	823,931
Assigned		
Subsequent years' expenditures	1,911,357	1,811,357
Land/building acquisition	1,000,000	1,000,000
Capital accumulation	2,434,698	2,039,973
Insurance	1,200,000	1,200,000
Workers compensation	1,500,000	1,500,000
Dental insurance	50,000	50,000
Unfunded pension liability	10,000,000	8,000,000
Productivity/operation improvement	200,000	100,000
Tax refunds	200,000	100,000
Tax levy reduction	1,590,000	1,590,000
Capital replacements	875,000	300,000
Strategic planning	97,500	97,500
Public access	500,000	500,000
Computer/technology improvement	179,886	-
Community and economic development	600,000	-
Unassigned		
Contingency	3,013,583	3,011,993
Other	3,251,734	3,976,111
Total General Fund	<u>38,487,336</u>	<u>34,802,571</u>
Special Revenue Funds		
Block grant	-	(95,248)
HOME Program	40,783	225,409
Rental energy loans	432,709	432,709
Housing programs	359,895	656,808
Library endowment	81,049	68,420
Cable communications	775,589	791,411
Fire grants	79,929	81,159
Information technology joint ventures	76,468	87,155
Miscellaneous grants	(6,158)	-
Centennial	-	123
Stimulus programs	25,340	7,507
Total Special Revenue Funds	<u>1,865,604</u>	<u>2,255,453</u>

(Continued)

1. **Governmental Fund Balances (Continued)**

	12/31/13	12/31/12
Debt Service Fund	191,877	187,868
Capital Projects Funds		
Public works improvements	(1,430,397)	(271,701)
Tax Increment District No. 2	215,015	166,316
Tax Increment District No. 3	-	198,556
Tax Increment District No. 5	1,111,799	(842,629)
Tax Increment District No. 6	(216,970)	(422,665)
Tax Increment District No. 7	3,159,836	2,755,307
Tax Increment District No. 9	88,060	83,204
Tax Increment District No. 10	(1,139,666)	(833,577)
Tax Increment District No. 11	103,006	202,937
Tax Increment District No. 12	(24,067)	(23,003)
Tax Increment District No. 13	21,139	(163,084)
Total Capital Projects Funds	1,887,755	849,661
Total Governmental Fund Balances	<u>\$ 42,432,572</u>	<u>\$ 38,095,553</u>

## 2. Water Utility

Presented below is a comparative summary of revenues, expenses and changes in net position for the water utility enterprise fund for the years ended December 31, 2013 and 2012.

	2013	2012
Operating Revenues		
Charges for services	\$ 7,523,275	\$ 7,755,721
Operating Expenses		
Operation and maintenance	5,908,469	5,404,420
Depreciation	697,319	665,961
Total Operating Expenses	6,605,788	6,070,381
Operating Income	917,487	1,685,340
Nonoperating Revenues (Expenses)		
Interest expense	(288,087)	(314,003)
Interest rate subsidy	4,364	21,222
Merchandising and jobbing	24,529	15,109
Miscellaneous	23,291	12,118
Total Nonoperating Revenues (Expenses)	(235,903)	(265,554)
Income before Capital Contributions and Transfers	681,584	1,419,786
Capital contributions	14,979	172,493
Transfers	(775,502)	(738,489)
Change in Net Position	(78,939)	853,790
Net Position - January 1	16,391,013	15,537,223
Net Position - December 31	\$ 16,312,074	\$ 16,391,013

The water utility had a change in net position of (\$78,939) for 2013 compared to a change in net position of \$853,790 for 2012 mostly due to an increase in maintenance and repair costs and a decrease in capital contributions in 2013 compared to 2012.



**3. Sanitary Sewer Utility**

Presented below is a comparative summary of revenues, expenses and changes in net position for the sanitary sewer utility enterprise fund for the years ended December 31, 2013 and 2012:

	2013	2012
Operating Revenues		
Charges for services	\$ 7,100,955	\$ 7,257,736
Operating Expenses		
Operation and maintenance	4,606,767	5,043,518
Depreciation	402,459	388,739
Total Operating Expenses	<u>5,009,226</u>	<u>5,432,257</u>
Operating Income	<u>2,091,729</u>	<u>1,825,479</u>
Nonoperating Revenues (Expenses)		
Interest expense	(504,109)	(477,940)
Interest rate subsidy	8,390	15,842
State and local grants	4,175	289,204
Loss on sale of assets	(29,287)	(15,164)
Miscellaneous	3,336	2,258
Total Nonoperating Revenues (Expenses)	<u>(517,495)</u>	<u>(185,800)</u>
Income before Transfers	1,574,234	1,639,679
Transfers	<u>(85,816)</u>	<u>(82,224)</u>
Change in Net Position	1,488,418	1,557,455
Net Position - January 1	<u>14,764,845</u>	<u>13,207,390</u>
Net Position - December 31	<u>\$ 16,253,263</u>	<u>\$ 14,764,845</u>

The sewer utility generated a change in net position of \$1,488,418 for 2013 compared to a change in net position of \$1,557,455 for 2012 mostly due to the receipt of a grant from MMSD in 2012.

#### 4. **Storm Water Utility**

Presented below is a summary of revenues, expenses and changes in net position for the storm water utility enterprise fund for the year ended December 31, 2013 and 2012:

	2013	2012
Operating Revenues		
Charges for services	\$ 3,976,612	\$ 3,749,021
Operating Expenses		
Operation and maintenance	1,793,564	1,591,483
Depreciation	575,219	561,382
Total Operating Expenses	2,368,783	2,152,865
Operating Income	1,607,829	1,596,156
Nonoperating Revenues (Expenses)		
Interest expense	(82,669)	(73,637)
Interest rate subsidy	11,809	25,475
Miscellaneous	56,445	53,108
Total Nonoperating Revenues (Expenses)	(14,415)	4,946
Income before Capital Contributions and Transfers	1,593,414	1,601,102
Transfers	(300,000)	(300,000)
Change in Net Position	1,293,414	1,301,102
Net Position - January 1	32,278,575	30,977,473
Net Position - December 31	\$ 33,571,989	\$ 32,278,575

The storm water utility generated a change in net position of \$1,293,414 for 2013 compared to \$1,301,102 for 2012 as increases in expenses were offset by increases in customer charges.

## COMMENTS AND OBSERVATIONS

### 1. Fair Value of Investments

Generally accepted accounting principles require that municipalities report investments at their fair value. Fair value is the amount at which an investment could be sold, other than in a situation of forced liquidation or sale. The City currently maintains investment values at cost or amortized cost, which may differ from fair value.

We recommend that at year end, all investments held by the City be reported at fair value. Any difference between the carrying amount of the investment and its fair value would be reported as part of investment earnings.

Also, in reviewing the amortization schedule of discounts and premiums recorded on City investments, it appeared that some individual investment premiums and discounts were still being amortized on investments which were no longer held by the City. Typically as an investment is sold, matures, or is called, the remaining premium or discount on the investment would be written off to investment earnings.

### 2. New Single Audit Requirements

U.S. Office of Management and Budget ("OMB") issued one Circular, often referred to as the "Super-Circular" or "Omni-Circular," in December, 2013 which will be effective for fiscal years beginning on or after December 26, 2014. This Circular supersedes eight existing Circulars and combines into one place the administrative requirements, cost principles, and audit requirements for all organizations that receive Federal Awards. The new Circular was designed to strengthen oversight of federal awards and increase the efficiency and effectiveness of single audits.

Since you receive federal assistance, your policies and procedures may need to be reviewed and potentially modified to comply with this new guidance. To assist you in this process, we have identified the key changes for your review and consideration.

#### **Administrative requirements**

Administrative requirements generally focus on how federal funds are managed by recipients and involve overall policies, procedures and related controls. Specific changes of the Circular which may impact you follow:

- **Recipient Monitoring and Performance Management.** Requires greater focus on federal agencies and pass-through entities to evaluate the risk of passing through federal funds to a recipient with additional pre- and post-award monitoring responsibilities. Risks to be considered consist of financial stability, performance history and prior audit findings, among other factors. As a recipient, you may notice additional oversight activities by your grantor agencies. As a pass-through agency, you may need to integrate additional performance standards into your contracts and monitored results throughout the contract. In addition, the Circular requires your contracts to contain specific data elements within the contract.
- **Procurement Responsibilities.** Expands procurement responsibilities and conflict-of-interest guidance to ensure all organizations have adequate policies and procedures to protect the integrity of procurements of federal funds.
- **Internal Controls.** Requires organizations to establish and maintain effective internal controls over federal awards, including measures to safeguard protected personally identifiable information. Specifically, you should document controls the controls you are relying on based on guidance established in the *Internal Control Integrated Framework* issued by the Committee of Sponsoring Organizations of the Treadway Commission.

## Cost principles

Both federal and state agencies have previously established guidelines which determine costs which were allowable for reimbursement under their grant agreements; however, different guidelines existed between colleges and educational institutions, governments, and not-for-profit organizations. The new Circular consolidates three Circulars and expands guidance. Specific changes of the Circular which may impact you follow:

- **Direct and Indirect Costs.** Expands guidelines regarding to how direct and indirect costs are reported, promoting increased consistency and transparency when applying indirect costs to grant awards. This may impact your indirect cost plan prepared annually by the City.
- **Time and Effort Reporting.** Provides alternatives to the current reporting requirements for salaries and wages to prevent duplicating efforts when organizations have good internal controls. As auditors, we will be required to verify your controls work effectively and efficiently to safeguard federal funds.

## Audit requirements

For the year ended December 31, 2013, the City was required to have an audit in compliance with OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, as it expended more than \$500,000 in federal awards (commonly referred to as a "single audit"). Specific changes of the Circular related to audit requirements which may impact you follow:

- **Increased threshold.** The new guidelines increase the requirement for an organization to have a single audit performed from the current threshold of \$500,000 to \$750,000 of federal awards expended.
- **Major program determination.** Currently, federal programs with expenditures of \$300,000 or more must be periodically tested as major programs (Type A programs.) The new guidelines increase the threshold for Type A programs to at least \$750,000.
- **High risk classification.** The new guidelines amend the types of findings that will trigger a high-risk classification, which requires a Type A program to be audited as a major program. Type A programs will be considered high-risk if, in the most recent audit period, the program:
  - Did not receive an unmodified opinion;
  - Had a material weakness in internal control; or
  - Had known or likely questioned costs exceeding 5% of total program expenditures
- **Audit coverage.** The new guidelines reduce the percentage of coverage required in a single audit from 50% to 40% of federal expenditures for entities that do not qualify as low-risk auditees and from 25% to 20% for low-risk auditees. The guidance also revises the criteria for low-risk auditee status, making it more difficult for some organization to qualify.
- **Audit findings.** The new guidelines require auditors to report their findings in greater detail, but it increases the threshold for reporting questioned costs from \$10,000 to \$25,000. The requirement for a finding related to state programs continues to be \$1,000 although the State of Wisconsin is evaluating.
- **Corrective Action Plan.** The City must prepare a correction plan for current year audit findings. When audit findings were not corrected or were only partially corrected, the summary schedule must describe the reasons for the finding's recurrence and planned corrective action, and any partial corrective action taken.
- **Schedule of Expenditures of Federal Awards.** The City must include federal awards passed through to recipients in its Schedule of Expenditures of Federal Awards. Because a recipient may receive funding under multiple grants, including City funds, the City will need to allocation payments by funding source to comply with this requirement.

This comment is for informational purposes only. We would be happy to assist the City in determining how the new guidance will impact future single audits of the City.

## **APPENDIX**



DEPARTMENT OF ADMINISTRATION & FINANCE  
FINANCE DIVISION

June 24, 2014

Schenck SC  
2200 Riverside Drive  
P.O. Box 23819  
Green Bay, WI 54305-3819

**Mark D. Wyss**  
*Manager of Finance/Comptroller*  
mwyss@westalliswi.gov  
**Kris Moen, CPA**  
*Finance Supervisor*  
kmoen@westalliswi.gov  
**Nicole O'Connor**  
*Senior Accountant*  
noconnor@westalliswi.gov  
**Shawn Hart**  
*Accountant*  
shart@westalliswi.gov

This representation letter is provided in connection with your audit of the financial statements of the City of West Allis, Wisconsin, (the "City"), which comprise the respective financial position of the governmental activities, the business-type activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information as of December 31, 2013, and the respective changes in the financial position and where applicable, cash flows for the year then ended, and the related notes to the financial statements for the purpose of expressing opinions as to whether the financial statements are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP).

Certain representations in this letter are described as being limited to matters that are material. Items in No. 50 are considered material based on the materiality criteria specified in OMB Circular A-133 and the *State Single Audit Guidelines* issued by the Wisconsin Department of Administration. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement. An omission or misstatement that is monetarily small in amount could be considered material as a result of qualitative factors.

We confirm, to the best of our knowledge and belief, as of June 24, 2014, the following representations made to you during your audit.

**Financial Statements**

1. We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated September 24, 2013, including our responsibility for the preparation and fair presentation of the financial statements and for preparation of the supplementary information in accordance with the applicable criteria.
2. The financial statements referred to above are fairly presented in conformity with U.S. GAAP and include all properly classified funds and other financial information of the primary government and all component units required by generally accepted accounting principles to be included in the financial reporting entity.
3. In regards to accounting estimates:
  - The measurement processes used by management in determining accounting estimates is appropriate and consistent.
  - The assumptions appropriately reflect management's intent and ability to carry out specific courses of action.

- The disclosures related to accounting estimates are complete and appropriate.
  - No subsequent event has occurred that would require adjustment to the accounting estimates or disclosures included in the financial statements.
4. We acknowledge our responsibility 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.
  5. We acknowledge our responsibility for the design, implementation, and maintenance of internal control to prevent and detect fraud.
  6. Significant assumptions we used in making accounting estimates are reasonable.
  7. Related party relationships and transactions, including revenues, expenditures/expenses, loans, transfers, leasing arrangements, and guarantees, and amounts receivable from or payable to related parties have been appropriately accounted for and disclosed in accordance with the requirements of U.S. GAAP.
  8. All events subsequent to the date of the financial statements and for which U.S. GAAP requires adjustment or disclosure have been adjusted or disclosed. No events, including instances of noncompliance, have occurred subsequent to the balance sheet date and through the date of this letter that would require adjustment to or disclosure in the aforementioned financial statements or in the schedule of findings and questioned costs.
  9. We are in agreement with the adjusting journal entries you have proposed, and they have been posted to the City's accounts.
  10. The effects of all known actual or possible litigation, claims, and assessments have been accounted for and disclosed in accordance with U.S. GAAP.
  11. Guarantees, whether written or oral, under which the City is contingently liable, if any, have been properly recorded or disclosed.

**Information Provided**

12. We have provided you with:
  - a. Access to all information, of which we are aware, that is relevant to the preparation and fair presentation of the financial statements, such as records, documentation, and other matters and all audit or relevant monitoring reports, if any, received from funding sources.
  - b. Additional information that you have requested from us for the purpose of the audit.
  - c. Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.
  - d. Minutes of the meetings of the City Council or summaries of actions of recent meetings for which minutes have not yet been prepared.
13. All material transactions have been recorded in the accounting records and are reflected in the financial statements and the schedules of expenditures of federal awards and state financial assistance.

14. We made an assessment of the risk that the financial statements may be materially misstated as a result of fraud. We have disclosed the results of our assessment as follows:
  - a. We have no knowledge of any fraud or suspected fraud that affects the entity and involves:
    - i. Management,
    - ii. Employees who have significant roles in internal control, or
    - iii. Others where the fraud could have a material effect on the financial statements.
  - b. We have no knowledge of any allegations of fraud or suspected fraud affecting the City's financial statements communicated by employees, former employees, regulators, or others.
15. We have disclosed to you all known instances of noncompliance or suspected noncompliance with provisions of laws, regulations, contracts, or grant agreements, or abuse, whose effects should be considered when preparing financial statements.
16. We have disclosed to you all known actual or possible litigation, claims, and assessments whose effects should be considered when preparing the financial statements.
17. We have disclosed to you the identity of the City's related parties and all the related party relationships and transactions of which we are aware.

**Government - specific**

18. We have made available to you all financial records and related data and all audit or relevant monitoring reports, if any, received from funding sources.
19. There have been no communications from regulatory agencies concerning noncompliance with, or deficiencies in, financial reporting practices.
20. We have a process to track the status of audit findings and recommendations.
21. We have identified to you any previous audits, attestation engagements, and other studies related to the audit objectives and whether related recommendations have been implemented.
22. We have provided our views on reported findings, conclusions, and recommendations, as well as our planned corrective actions, for the report.
23. The City has no plans or intentions that may materially affect the carrying value or classification of assets, liabilities, deferred inflows/outflows of resources, or equity.
24. We are responsible for compliance with the laws, regulations, and provisions of contracts and grant agreements applicable to us, including tax or debt limits and debt contracts; and we have identified and disclosed to you all laws, regulations and provisions of contracts and grant agreements that we believe have a direct and material effect on the determination of financial statement amounts, or other financial data significant to the audit objectives, including legal and contractual provisions for reporting specific activities in separate funds.
25. There are no violations or possible violations of budget ordinances, laws and regulations (including those pertaining to adopting, approving, and amending budgets), provisions of contracts and grant agreements, tax or debt limits, and any related debt covenants whose effects should be considered



for disclosure in the financial statements, or as a basis for recording a loss contingency, or for reporting on noncompliance.

26. As part of your audit, you assisted with preparation of the financial statements and related notes, the schedule of expenditures of federal awards, and the schedule of state financial assistance. We have designated an individual with suitable skill, knowledge, or experience to oversee your services and have assumed all management responsibilities. We have reviewed, approved, and accepted responsibility for those financial statements and related notes, the schedule of expenditures of federal awards, and the schedule of state financial assistance.
27. The City has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral.
28. The City has complied with all aspects of contractual agreements that would have a material effect on the financial statements in the event of noncompliance.
29. We have followed all applicable laws and regulations in adopting, approving, and amending budgets.
30. The financial statements include all component units as well as joint ventures with an equity interest, and properly disclose all other joint ventures and other related organizations.
31. The financial statements properly classify all funds and activities.
32. All funds that meet the quantitative criteria in GASB Statement Nos. 34 and 37 for presentation as major are identified and presented as such and all other funds that are presented as major are particularly important to financial statement users.
33. Components of net position (net investment in capital assets, restricted, and unrestricted) and components of fund balance (nonspendable, restricted, committed, assigned and unassigned) are properly classified and, if applicable, approved.
34. Provisions for uncollectible receivables have been properly identified and recorded.
35. Expenses have been appropriately classified in or allocated to functions and programs in the statement of activities, and allocations have been made on a reasonable basis.
36. Revenues are appropriately classified in the statement of activities within program revenues and general revenues.
37. Interfund, internal, and intra-entity activity and balances have been appropriately classified and reported.
38. Deposits and investment securities and derivative transactions are properly classified as to risk and are properly disclosed.
39. Capital assets, including infrastructure and intangible assets, are properly capitalized, reported, and, if applicable, depreciated.
40. Joint ventures, jointly governed organizations, and other related organizations have been properly disclosed in the financial statements.
41. We have appropriately disclosed the City's policy regarding whether to first apply restricted or unrestricted resources when an expense is incurred for purposes for which both restricted and

unrestricted net position is available and have determined that net position were properly recognized under the policy.

42. We acknowledge our responsibility for the required supplementary information (RSI). The RSI is measured and presented within prescribed guidelines and the methods of measurement and presentation have not changed from those used in the prior period. We have disclosed to you any significant assumptions and interpretations underlying the measurement and presentation of the RSI.
43. We acknowledge our responsibility for presenting the nonmajor fund combining statements, individual fund statements, supporting schedules, and statistical data (the supplementary information) in accordance with accounting principles generally accepted in the United States of America, and we believe the supplementary information, including its form and content, is fairly presented in accordance with accounting principles generally accepted in the United States of America. The methods of measurement and presentation of the supplementary information have not changed from those used in the prior period, and we have disclosed to you any significant assumptions or interpretations underlying the measurement and presentation of the supplementary information.
44. We agree with the findings of specialists in evaluating the other post-employment benefits, pension benefits, and incurred but not reported claims and have adequately considered the qualifications of the specialist in determining the amounts and disclosures used in the financial statements and underlying accounting records. We did not give or cause any instructions to be given to specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an impact on the independence or objectivity of the specialists.
45. The methods and significant assumptions used to determine fair values of financial instruments are as follows: Fair value is the amount at which a financial instrument could be exchanged in a current transaction between willing parties, other than in a forced or liquidation sale. The methods and significant assumptions used result in a measure of fair value appropriate for financial statement measurement and disclosure purposes.
46. Receivables recorded in the financial statements represent valid claims against debtors for transactions arising on or before the balance sheet date and have been appropriately reduced to their estimated net realizable value.
47. Capital assets have been evaluated for impairment as a result of significant and unexpected decline in service utility.
48. We believe that the actuarial assumptions and methods used to measure pension and OPEB liabilities and costs for financial accounting purposes are appropriate in the circumstances.
49. We do not plan to make frequent amendments to our pension or other post-retirement benefit plans.
50. With respect to federal and state award programs:
  - a. We are responsible for understanding and complying with and have complied with the requirements of OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations* and the *State Single Audit Guidelines* issued by the Wisconsin Department of Administration, including requirements relating to preparation of the schedule of federal awards and the schedule of state financial assistance.
  - b. We acknowledge our responsibility for presenting the schedule of expenditures of federal awards (SEFA) in accordance with the requirements of OMB Circular A-133 §310.b and the schedule of state financial assistance (SSFA) in accordance with the requirements of the *State Single Audit*

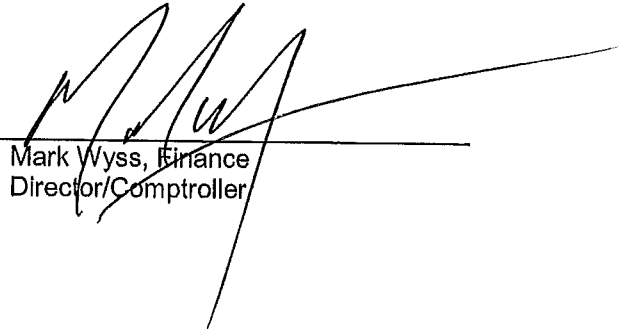
*Guidelines* and we believe the SEFA and SSFA, including their form and content, are fairly presented in accordance with the Circular and the *Guidelines*. The methods of measurement or presentation of the SEFA and SSFA have not changed from those used in the prior period and we have disclosed to you any significant assumptions and interpretations underlying the measurement and presentation of the SEFA and SSFA.

- c. We have identified and disclosed to you all of our government programs and related activities subject to OMB Circular A-133 and the *State Single Audit Guidelines* and included in the SEFA and SSFA made during the audit period for all awards provided by federal and state agencies in the form of grants, federal cost-reimbursement contracts, loans, loan guarantees, property (including donated surplus property), cooperative agreements, interest subsidies, insurance, food commodities, direct appropriations, and other direct assistance.
- d. We are responsible for understanding and complying with, and have complied with, the requirements of laws, regulations, and the provisions of contracts and grant agreements related to each of our federal and state programs and have identified and disclosed to you the requirements of laws, regulations, and the provisions of contracts and grant agreements that are considered to have a direct and material effect on each major federal and state program.
- e. We are responsible for establishing and maintaining, and have established and maintained, effective internal control over compliance requirements applicable to federal and state programs that provide reasonable assurance that we are managing our federal and state awards in compliance with laws, regulations, and the provisions of contracts and grant agreements that could have a material effect on our federal and state programs. We believe the internal control system is adequate and is functioning as intended.
- f. We have made available to you all contracts and grant agreements (including amendments, if any) and any other correspondence with federal and state agencies or pass-through entities relevant to federal and state programs and related activities.
- g. We have received no requests from a federal or state agency to audit one or more specific programs as a major program.
- h. We have complied with the direct and material compliance requirements, including when applicable, those set forth in the *OMB Circular A-133 Compliance Supplement* and the *State Single Audit Guidelines*, relating to federal and state awards and have identified and disclosed to you all amounts questioned and all known noncompliance with the requirements of federal and state awards.
- i. We have disclosed any communications from grantors and pass-through entities concerning possible noncompliance with the direct and material compliance requirements, including communications received from the end of the period covered by the compliance audit to the date of the auditors' report.
- j. We have disclosed to you the findings received and related corrective actions taken for previous audits, attestation engagements, and internal or external monitoring that directly relate to the objectives of the compliance audit, including findings received and corrective actions taken from the end of the period covered by the compliance audit to the date of the auditors' report.
- k. Amounts claimed or used for matching were determined in accordance with relevant guidelines in OMB Circular A-87, *Cost Principles for State, Local, and Tribal Governments*, and OMB's *Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*.

- l. We have disclosed to you our interpretation of compliance requirements that may have varying interpretations.
  - m. We have made available to you all documentation related to compliance with the direct and material compliance requirements, including information related to federal and state program financial reports and claims for advances and reimbursements.
  - n. We have disclosed to you the nature of any subsequent events that provide additional evidence about conditions that existed at the end of the reporting period affecting noncompliance during the reporting period.
  - o. There are no such known instances of noncompliance with direct and material compliance requirements that occurred subsequent to the period covered by the auditors' report.
  - p. No changes have been made in internal control over compliance or other factors that might significantly affect internal control, including any corrective action we have taken regarding significant deficiencies in internal control over compliance (including material weaknesses in internal control over compliance), have occurred subsequent to the date as of which compliance was audited.
  - q. Federal and state program financial reports and claims for advances and reimbursements are supported by the books and records from which the financial statements have been prepared.
  - r. The copies of federal and state program financial reports provided you are true copies of the reports submitted, or electronically transmitted, to the respective federal and state agency or pass-through entity, as applicable.
  - s. We have monitored subrecipients to determine that they have expended pass-through assistance in accordance with applicable laws and regulations and have met the requirements of OMB Circular A-133 and the *State Single Audit Guidelines*.
  - t. We have taken appropriate action, including issuing management decisions, on a timely basis after receipt of subrecipients' auditors' reports that identified noncompliance with laws, regulations, or the provisions of contracts or grant agreements and have ensured that subrecipients have taken the appropriate and timely corrective action on findings.
  - u. We have considered the results of subrecipient audits and have made any necessary adjustments to our books and records.
  - v. We have charged costs to federal and state awards in accordance with applicable cost principles.
  - w. We are responsible for and have accurately prepared the summary schedule of prior audit findings to include all findings required to be included by OMB Circular A-133 and the *State Single Audit Guidelines* and we have provided you with all information on the status of the follow-up on prior audit findings by federal and state awarding agencies and pass-through entities, including all management decisions.
  - x. We are responsible for and have accurately prepared the auditee section of the Data Collection Form as required by OMB Circular A-133.
  - y. We are responsible for preparing and implementing a corrective action plan for each audit finding.
51. We have evaluated and classified any subsequent events as recognized or nonrecognized through the date of this letter. No events, including instances of noncompliance, have occurred subsequent to

the balance sheet date and through the date of this letter that would require adjustment to or disclosure in the aforementioned financial statements or in the schedule of findings and questioned costs.

Signed:



Mark Wyss, Finance  
Director/Comptroller