

Financial Statements and Supplemental Financial Information Year Ended March 31, 1999 with Reports of Certified Public Accountants on Financial and Compliance Examination

under provisions of state law, this report is a public document. A copy of the report has been submitted to the audited, or reviewed, entity and other appropriate public officials. The report is available for public inspection at the Baton Rouge office of the Legislative Auditor and, where appropriate, at the office of the parish clerk of court

Release Date 10-13-99

VanRheenen & Miller, Ltd. Certified Public Accountants 1309 East Race Avenue Searcy, Arkansas 72143

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FINANCIAL SECTION

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C. Mark VanRheenen, CPA Steaven E. Miller Jr., CPA L. Scott Rose, CPA

1309 E. Race Avenue • Searcy, Arkansas 72143 • (501) 268-8356 • Fax 268-9362

Independent Auditors' Report

Board of Commissioners Housing Authority of the Town of Broussard 210 North St. Jean St. Broussard, LA 70518

We have audited the accompanying general purpose financial statements of Housing Authority of the Town of Broussard as of March 31, 1999, and for the year then ended, as listed in the table of contents. These general purpose financial statements and the supplemental financial information - statutory basis referred to below are the responsibility of the authority's management. Our responsibility is to express an opinion on these general purpose financial statements based on our audit.

We conducted our audit in accordance with generally accepted auditing standards 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 general purpose financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the general purpose financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall general purpose financial statements presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the general purpose financial statements referred to above present fairly, in all material respects, the financial position of Housing Authority of the Town of Broussard as of March 31, 1999, and the results of its operations for the year then ended in conformity with generally accepted accounting principles.

In accordance with Government Auditing Standards, we have also issued a report dated July 27, 1999 on our consideration of Housing Authority of the Town of Broussard's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts and grants.

The accompanying financial information listed as supplemental financial information - statutory basis in the table of contents is presented for purposes of additional analysis and is not a required part of the financial statements of Housing Authority of the Town of Broussard. As described in Note 1, the supplemental financial information - statutory basis was prepared in conformity with the accounting practices prescribed by the U.S. Department of Housing and Urban Development, which is a comprehensive basis of accounting other than generally accepted accounting principles. Such supplemental financial information - statutory basis has been subjected to the auditing procedures applied in the audit of the general purpose financial statements and, in our opinion, is fairly presented in all material respects in conformity with the comprehensive basis of accounting described in Note 1.

The supplemental financial information-GASB required information is not a required part of the basic financial statements but is supplementary information required by the Governmental Accounting Standards Board. We have applied certain limited procedures, which consisted principally of inquiries of management regarding the methods of measurement and presentation of the supplementary information. However, we did not audit the information and do not express an opinion on it. In addition, we do not provide assurance that Housing Authority of the Town of Broussard is or will become year 2000 compliant, that Housing Authority of the Town of Broussard's year 2000 remediation efforts will be successful in whole or in part, or that parties with which Housing Authority of the Town of Broussard does business are or will become year 2000 compliant.





Members, American Institute of Certified Public Accountants

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GENERAL PURPOSE FINANCIAL STATEMENTS

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Combined Balance Sheet - All Fund Types and Account Groups March 31, 1998

	overnmental und Types	Acc	count Groups				
	 Special Revenue	e	General Fixed Assets	•	Memo Totals 1999	·	Memo Totals 1998
<u>Assets and Other Debits</u> Assets: Cash Investments Receivables:	\$ 12,013.95 30,169.97	\$	-	\$	12,013.95 30,169.97	\$	39,321.87 -
Other Prepaid items Fixed assets	 - 		- 9,479.59		- - 9,479.59		9,739.50 998.50 11,998.35

<u>\$</u>	42,183.92	<u>\$</u>	9,479.59	<u>\$</u>	51,663.51	<u>\$</u>	62,058.22
\$	-	\$	-	\$	-	\$	956.25
	49,080.59		-		49,080.59		70,510.28
	730.74		-		730.74		729.74
<u> </u>			-		-		2,565.41
	49,811.33	-	_		49,811.33		74,761.68
	_		9 479 59		9 479 59		11,998.35
	_		0,470.00		0,475.00		11,000.00
	-		_		-		998.50
	(7,627.41)			_	(7,627.41)		(25,700.31)
	(7,627.41)		9,479.59	<u> </u>	1,852.18		(12,703.46)
\$	42.183.92	\$	9.479.59	\$	51.663.51	\$	62,058.22
	\$	\$ 49,080.59 730.74 49,811.33 	\$\$ 49,080.59 730.74 49,811.33 (7,627.41) (7,627.41)	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	$\begin{array}{cccccccccccccccccccccccccccccccccccc$	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$

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

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Combined Statement of Revenues, Expenditures, and Changes in Fund Balances -All Governmental Fund Types March 31, 1998

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Governmental
Fund Types

	Fund Types	_			
	Special Revenue	- <u>-</u>	Memo Totals 1999		Memo Totals 1998
Revenues: Operational subsidies/grants Interest	\$286,844.41 199.16	-	286,844.41 199.16	\$	305,808.72
Miscellaneous	3,097.52		3,097.52		3,408.04
Total Revenues	290,141.09		290,141.09	<u> </u>	309,216.76

Expenditures

Current:			
Housing operations			
Administration	52,262,80	52,262.80	49,943.51
General expense	7,806.44	7,806.44	7,731.00
Housing assistance	212,147.46	212,147.46	227,213.78
Capital outlay	849.99	849.99	2,843.86
Total Expenditures	273,066.69	273,066.69	287,732.15
Excess of Revenues over (under) Expenditures	17,074.40	17,074.40	21,484.61
Fund balances, beginning of period	(24,701.81)	(24,701.81)	(46,186.42)
Fund Balance, end of period	<u>\$ (7,627.41) </u> \$	(7,627.41) \$	(24,701.81)

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



Housing Authority of the Town of Broussard Broussard, Louisiana

Combined Statement of Revenues, Expenditures, and Changes in Fund Balances -Budget and Actual - All Governmental Fund Types March 31, 1998

	Special Revenue Funds					
		Budget		Actual		Variance Favorable Infavorable)
Revenues: Operational subsidies/grants Interest Miscellaneous	\$	335,925.00 - -	\$	286,844.41 199.16 3,097.52	\$	(49,080.59) 199.16 3,097.52
Total Revenues		335,925.00		290,141.09		(45,783.91)
Expenditures Current: Administrative salaries Professional fees Staff training Travel Sundry administration Insurance Employee benefits Housing assistance payments Capital expenditures		24,600.00 7,600.00 2,000.00 7,000.00 6,400.00 5,000.00 5,400.00 252,990.00 2,000.00		24,600.00 6,457.50 2,179.70 9,100.61 9,924.99 2,353.00 5,453.44 212,147.46 849.99		- 1,142.50 (179.70) (2,100.61) (3,524.99) 2,647.00 (53.44) 40,842.54 1,150.01
Total Expenditures		312,990.00		273,066.69		39,923.31
Excess of Revenues over (under) Expenditures	<u>\$</u>	22,935.00		17,074.40	<u>\$</u>	(5,860.60)
Fund balances, beginning of period				(24,701.81)		
Fund Balance, end of period			<u>\$</u>	(7,627.41)		

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

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Notes to the Financial Statements March 31, 1999

NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Introduction.

The financial statements of the entity have been prepared in accordance with generally accepted accounting principles (GAAP) as applied to governmental units. The entity applies all relevant Governmental Accounting Standards Board (GASB) pronouncements. The entity is chartered as a public corporation for the purpose of administering housing programs for low income families.

Under the United States Housing Act of 1937, as amended, the U.S. Department of Housing and Urban Development (HUD) has direct responsibility for administering low income housing programs in the United States. Accordingly, HUD has contracted with the entity to administer certain HUD funds.

The following is a summary of significant accounting policies:

A. Reporting Entity.

The entity is a public corporation, legally separate, fiscally independent and governed by Board of Commissioners. As required by generally accepted accounting principles, these financial statements present the financial position and results of operations of Housing Authority of the Town of Broussard, a primary government. There are no component units to be included herewith, but this report does include all funds, account groups, and programs which are controlled by the entity's governing body.

B. Basis of Presentation.

 Funds and Account Groups. The accounts of the entity are organized on the basis of funds or account groups, each of which is considered to be a separate accounting unit. The operations of each fund are reported as a separate set of self-balancing accounts which are comprised of each fund's assets, liabilities, fund equity, revenues, and expenditures or expenses, as appropriate. Resources are allocated to and for individual funds based upon the purposes for which they are to be spent and the means by which spending activities are controlled. The various accounts are grouped, in the financial statements in this report, into the following categories:

Governmental Fund Types

<u>Special revenue fund</u> - The special revenue funds are used to account for specific revenue sources (other than major capital projects) that are legally restricted to expenditures for specified purposes.

Account Groups

The account groups are used to account for fixed assets and long-term liabilities which are not reported in the respective governmental funds.

 <u>Comparative Data</u>. Comparative total data for the prior year have been presented in some accompanying financial statements in order to provide an understanding of changes in the entity's financial position and operations. However, comparative data by fund type have not been presented in each of the statements since inclusion of such data would make the statements unduly complex and difficult to read.

 Total Columns on Combined Statements. Total columns on the combined statements are captioned Memo Totals to indicate that they are presented only to facilitate financial analysis. Data in these columns do not present financial position, results of operations, or changes in financial position in conformity with generally accepted accounting principles. Neither is such data comparable to a consolidation. Interfund eliminations have not been made in the aggregation of this data.

Notes to the Financial Statements (Continued) March 31, 1999

- 4. Land, Structures, and Equipment. Land, structures and equipment used in governmental fund type operations are accounted for in the General Fixed Assets Account Group. No depreciation has been provided on such assets. All fixed assets are valued at historical cost or estimated historical cost if actual historical cost is not available. Donated assets are valued at their estimated fair value on the date donated. The entity does capitalize any "infrastructure" assets (streets, curbs, sidewalks, drainage system, and similar assets that are immovable) which are paid for by the entity.
- C. Basis of Accounting.
 - 1. Modified Accrual Basis of Accounting. All governmental fund types are accounted for using the modified accrual basis of accounting. The modified accrual basis of accounting recognizes revenues when both "measurable and available." Measurable means the amount can be determined. Available means collectible within the current period or soon enough thereafter to pay current liabilities. All significant revenue sources are susceptible to accrual.

Expenditures in governmental fund types are generally recognized under the modified accrual basis of accounting when the related fund liability is incurred. Exceptions to this general rule include: (1) accumulated unpaid vacation and sick pay which are not accrued, and (2) principal and interest on general long-term debt which is reported as expenditures in the year due.

The entity does not utilize encumbrance accounting.

- 2. Supplemental Financial Information Statutory Basis. The supplemental financial information statutory basis has been prepared in conformity with the accounting practices prescribed by HUD, which differ from generally accepted accounting principles as follows:
 - Governmental fund accounting principles are not utilized. а.
 - b. Annual Contributions and subsidies earned and/or received from HUD are recorded as contributions to surplus and are not included in the Statement of Income and Expenses.
 - Items of routinely recurring expenses are recognized when paid and are therefore not accrued. C.
 - d. The cost of accumulated unpaid vacation and sick leave is not accrued.
 - Financial statement formats vary from GAAP. е.
 - f. The entity does not utilize encumbrance accounting.
- D. Budgetary Data.
 - 1. Budget Policy and Practice. The entity prepares annual budgets for each fund (except Debt Service Fund and the Capital Projects Fund). Prior to the beginning of each budget year, the entity's annual budget is approved by the entity's governing body. Budgetary amendments require approval by the governing body. Budget amounts shown in the financial statements are the final authorized amounts for the year. All budgetary appropriations lapse at the end of each fiscal year.
 - 2. Encumbrances. Encumbrance accounting is not utilized by the entity.
 - 3. <u>Budget Basis of Accounting</u>. The budgets are prepared on the statutory basis of accounting as prescribed by HUD,

Notes to the Financial Statements (Continued) March 31, 1999

E. Assets, Liabilities and Fund Equity.

<u>Cash and Cash Equivalents</u>. The entity defines cash to include certificates of deposit, money market funds, savings accounts, demand deposits, and other short-term securities with maturities of three months or less. Consequently, the cost, carrying value, and market value are equivalent.

F. Revenue, Expenditures and Expenses.

- <u>Compensated Absences</u>. Vested and earned vacation and sick leave that are not accrued are reported in the general long-term debt account group. No expenditure is reported for those amounts. No liability is recorded for nonvesting accumulating rights to receive sick pay benefits.
- 2. Income Taxes. The entity is not subject to federal or state income taxes.

NOTE 2 - DEPOSITS AND INVESTMENTS

A. Deposits

It is the entity's policy for deposits to be 100% secured by collateral valued at market or par, whichever is lower, less the amount of the Federal Deposit Insurance Corporation (FDIC) insurance. The entity's deposits are categorized to give an indication of the level of risk assumed by the entity at March 31, 1999. The categories are described as follows:

- Category 1 Insured or collateralized with securities held by the entity or by its agent in the entity's name.
- Category 2 Collateralized with securities held by the pledging financial institution's trust department or agent in the entity's name.
- Category 3 Uncollateralized. (This includes bank balances that are collateralized with securities held by the pledging financial institution, or by its trust department or agent but not in the entity's name.)

Cash Deposits, categorized by level of risk, are:

		<u> </u>			U	
	Total					
Ba	nk Balances		1		2	3
				-		 — <u> </u>
\$	12,226.95	\$	12,226.95	\$.00	\$.00
				= <u> </u>		

Category

B. Investments

Investing is performed in accordance with HUD regulations and State Statues. Funds may be invested in the following type of investments:

- 1. Direct obligations of the United States pledged by its full faith and credit
- 2. Obligations of Federal government agencies and government sponsored agencies
- 3. Demand, savings, money-market, certificates of deposit, and Super NOW deposits at commercial banks, mutual

savings banks, savings and loan associations and credit unions provided that the entire deposit be insured by the FDIC or the National Credit Union Share Insurance Fund (NCUSIF) and any deposits in excess of insured amounts are adequately collateralized.

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Notes to the Financial Statements (Continued) March 31, 1999

- 4. Certain municipal depositary funds and local government investment pools provided that all investments made by these funds or pools are on the HUD-approved list of investment securities. The entity must limit its investments in this category to no more than 30 percent of the entity's available investment funds.
- Repurchase agreements for a term of 30 days or less entered into with Federally insured depositary institutions for purchase and sale of securities identified in 1 and 2 above.
- Certain no-load, open-end mutual funds investing in only HUD-approved investment securities. The entity must limit its investment in this category to no more than 20 percent of the entity's available investment funds.

The entity's investments are categorized to give an indication of the level of risk assumed by the entity at March 31, 1999. The categories are:

- Category 1 Insured or registered, with securities held by the entity or its agent in the entity's name
- Category 2 Uninsured and unregistered, with securities held by the counterparty's trust department or agent in the entity's name
- Category 3 Uninsured and Unregistered, with securities held by the counterparty, or its trust department or agent but not in the entity's name

Investments, categorized by level of risk, are:



NOTE 4 - DEFICIT FUND BALANCE

The following individual funds had deficit fund balances at March 31, 1999:

Special Revenue Certificate Housing

7,627.41 \$

NOTE 5 - CONTINGENCIES

The entity is subject to possible examinations made by federal regulators who determine compliance with terms,

conditions, laws and regulations governing grants given to the entity in the current and prior years. These examinations may result in required refunds by the entity to federal grantors and/or program beneficiaries.

SUPPLEMENTAL FINANCIAL INFORMATION - STATUTORY BASIS



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Balance Sheet - Statutory Basis March 31, 1998

Annual Contributions Contract FW-2108

<u>Assets</u>

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Cash-checking and on hand	\$ 12,013.95
Investments	30,169.97
Fixed assets	9,479.59
Total Assets	<u>\$51,663.51</u>

Liabilities and Surplus

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Accounts payable-HUD Accrued and withheld payroll taxes	\$	49,080.59 730.74
Total liabilities		49,811.33
Surplus		1,852.18
Total Liabilities and Surplus	<u>\$</u>	51,663.51

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Statement of Income and Expenses - Statutory Basis Certificate Housing Program March 31, 1998

Annual Contributions Contract FW-2108

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Operating income Interest on general fund investments	\$ 199.16
Other income	1,530.33
Total operating income	1,729.49
Operating Expenses	
Housing assistance payments	212,147.46
Administrative expenses	52,262.80
General expenses	7,806.44
Prior year adjustment affecting residual receipts	(1,567.19)
Total operating expenses	270,649.51
Net operating loss before other items	(268,920.02)
Other charges (credits)	
Prior year adjustments not affecting residual receipts	17,807.39
Total other charges (credits)	17,807.39
Net Loss	\$ (286,727.41)

Analysis of Surplus - Statutory Basis March 31, 1998

Annual Contributions Contract FW-2108

Unreserved surplus Balance per 3-31-98 audit Prior audit AJEs subsequently booked HUD adjustment prior year Net income (loss) FYE 3-31-99 HAP project provision FYE 3-31-99

Balance at 3-31-99

Reserved Surplus Balance per 3-31-98 audit \$ (3,217,145.95) 14,438.64 (58,405.72) (286,727.41) (10,860.59) · —

(3,558,701.03)

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OR provision FYE 3-31-99	
Balance at 3-31-99	
Project account - unfunded- HAP Balance per 3-31-98 audit HUD adjustment prior year HAP project provision FYE 3-31-99	62,584.28 58,405.72 10,860.59
Balance at 3-31-99	131,850.59
Cumulative contributions from HUD Balance per 3-31-98 audit Contribution FYE 3-31-99	3,140,147.21
Balance at 3-31-99	3,426,991.62
Cumulative donations Balance per 3-31-98 audit	1,711.00
Balance at 3-31-99	1,711.00
Total Surplus	<u>\$ 1,852.18</u>

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Computation of Annual Contributions Earned and Project Account and Operating Reserve Changes Certificate Housing Program March 31, 1998

Annual Contributions Contract FW-2108

Maximum Contribution Available	
Maximum annual contribution authorized	\$ 297,705.00
Project account, beginning of year	120,990.00
Total annual contribution available	418,695.00
Annual Contributions Required	
Housing assistance payments	212,147.46
Administrative fee	74,896.11

Total funds required

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lotal funds required		287,043.57
Less project receipts other than annual contribution		(199.16)
Total annual contribution required		286,844.41
Project Account Change New project account balance	\$	131,850.59
	<u></u>	
Annual Contributions Earned - lesser of contribution available or required	<u>\$</u>	286,844.41
Operating Reserve Changes		
Operating receipts	•	4 700 40
Operating income	\$	1,729.49
Annual contribution earned	<u></u>	286,844.41
Total operating receipts		288,573.90
Operating expenditures		
Operating expenses		270,649.51
Capital expenditures		849.99
Operating deficit carryover		24,701.81
Total operating expenditures		296,201.31
Net operating receipts available-audit		(7,627.41)
Audit adjustment (backed out)		3,614.15
Operating reserve deficit carryover	\$	(4,013.26)

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Operating reserve deficit carryover



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Analysis of General Fund Cash Balance March 31, 1998

Annual Contributions Contract FW-2108

Assets and Other Items

Cash-checking and on hand	\$ 12,013.95
Investments	<u>30,169.97</u>
Total	<u>\$ 42,183.92</u>

Liabilities, Reserves, and Other Items

Accounts payable-HUD	\$	49,080.59
Accrued and withheld payroll taxes		730,74
Operating reserve deficit carryover		(4,013.26)
Adjustments affecting Operating Reserve (backed out)	<u> </u>	(3,614,15)
Total	\$	42,183.92

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Certificate Housing Program

Adjusting Journal Entries March 31, 1999

Annual Contributions Contract FW-2108

	Acct. # for audit report	Acct. # for posting by PHA	Debit	Credit
(1) Accounts Payable- HUD	2440	0440		
Operating Reserve	2118	2118		199.16
• •	2826	2826	199.16	
Cummulative HUD Contributions	2840	2840	199.16	
Project Account	2827	2827		199.16
To correct closing adjustments for omission				
of account 3610 from				
from 5268, line 28.				

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Unreserved Surplus Project Account To adjust balance to HUD approved amounts.	2810 2827	2810 2827	82,770.00	82,770.00
(3) Project Account Unreserved Surplus To adjust operating reserve to actual and reclass deficit balance.	2827 2810	2827 2810	14,161.51	14,161.51
(4) Prior Yr. Adj. Not Aff. R.R. Loss on Disposal of Assets Reclass prior year audit adjustment for disposal of equipment.	6020 6120	Do Not Book	16,240.48	16,240.48
(5) Prior Yr. Adj. Aff. R.R. Prior Yr. Adj. Not Aff. R.R. To correct BSA imbalance.	6010 6020	6010 6020	3,614.15	3,614.15

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Schedule of Expenditures of Governmental Awards March 31, 1998

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			Balance			Balance
		Current Year	Beginning of	Grant		End of Year
	Grant	Program	Year - Cash/	Receipts or	Grant	Cash/
	ID	or Award	Receivable/	Revenue	Disbursements/	Receivable
Grantor/Program Title	Number	Amount	(Payable)	Recognized	Expenditures	(Payable)

U.S. Department of Housing and Urban Development

Direct Programs:

Section 8 Rental Certificate	FW-2108	\$ 286,844.41	<u>\$ (70,510.28</u>)	\$ 265,414.72	<u>\$ 286,844.41</u>	<u>\$ (49,080.59</u>)
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See Note 1 to Financial Statements for a discussion of accounting principles applied to this statement.

See Notes to Financial Statements.



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SUPPLEMENTAL FINANCIAL INFORMATION -GASB REQUIRED INFORMATION

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Year 2000 Supplementary Information March 31, 1999

GASB Technical Bulletin No. 98-1 requires certain information to be disclosed regarding the impact of the Year 2000 (Y2K) on the processing of date dependent information by the computerized information systems being utilized by governmental entities.

GASB Technical Bulletin No. 99-1 further expounded on the disclosure requirements and methods of reporting. The disclosures that follow are intended to comply with these requirements:

It appears that the Housing Authority of the Town of Broussard has addressed the potential impact of the Year 2000 (Y2K) on the processing of date-dependent information by the computerized information systems being utilized by the Authority. The PHA is in the implementation stage of compliance. All application software, operating systems, and computer hardware appear to be Y2K compliant. The Y2K Issue is the result of computer programs being written using two digits (rather than four) to define a year. This could result in miscalculations or system failures. No significant additional costs will be required to make computer systems and other equipment Y2K compliant.

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NON-FINANCIAL SECTION





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Report on Compliance and on Internal Control Over Financial Reporting Based on an Audit of General Purpose Financial Statements Performed in Accordance with Government Auditing Standards

Board of Commissioners Housing Authority of the Town of Broussard 210 North St. Jean St. Broussard, LA 70518

We have audited the general purpose financial statements of Housing Authority of the Town of Broussard as of and for the year ended March 31, 1999, and have issued our report thereon dated July 27, 1999. We conducted our audit in accordance with generally accepted auditing standards and the standards applicable to financial audits contained in <u>Government Auditing Standards</u>, issued by the Comptroller General of the United States.

Compliance

As part of obtaining reasonable assurance about whether Housing Authority of the Town of Broussard's general purpose 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 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 <u>Government Auditing Standards</u>.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered Housing Authority of the Town of Broussard's internal control over financial reporting in order to determine our auditing procedures for the purpose of expressing our opinion on the general purpose financial statements and not to provide assurance on the internal control over financial reporting. Our consideration of the internal control over financial reporting would not necessarily disclose all matters in the internal control over financial reporting that might be material weaknesses. A material weakness is a condition in which the design or operation of one or more of the internal control components does not reduce to a relatively low level the risk that misstatements in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. We noted no matters involving the internal control over financial reporting and its operation that we consider to be material weaknesses.

This report is intended for the information of the Board of Commissioners, management and federal awarding agencies and pass-through entities. However, this report is a matter of public record and its distribution is not limited.

Van Rheenm & Millen Utl.

VanRheenen & Miller, Ltd. Certified Public Accountants

July 27, 1999

Members, American Institute of Certified Public Accountants

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