

Board of County Commissioners
Douglas County

We are pleased to present this report related to our audit of the basic financial statements of Douglas County, Kansas (County) for the year ended December 31, 2010. This report summarizes certain matters required by professional standards to be communicated to you in your oversight responsibility for the County's financial reporting process.

Required Communications

Statement on Auditing Standards No. 114 requires the auditor to communicate certain matters to keep those charged with governance adequately informed about matters related to the financial statement audit that are, in our professional judgment, significant and relevant to the responsibilities of those charged with governance in overseeing the financial reporting process. The following summarizes these communications.

Auditors' Responsibility under Professional Standards

Our responsibility under auditing standards generally accepted in the United States of America, *Government Auditing Standards* issued by the Comptroller General of the United States; the provisions of the Single Audit Act; OMB Circular A-133; OMB's *Compliance Supplement*; and the *Kansas Municipal Audit Guide* has been described to you in our arrangement letter dated March 3, 2011.

Accounting Policies

Management has the ultimate responsibility for the appropriateness of the accounting policies used by the County. The County's significant accounting policies are discussed in Note 1 to the financial statements. During 2010, the County changed its method of accounting to prepare its financial statements on a basis of accounting which demonstrates compliance with the cash basis and budget laws of the State of Kansas. See Note I.B. for a complete description of this basis of accounting. Previously, the County had reported its financial statements in conformity with accounting principles generally accepted in the United States of America. See also Note IV.E. for a discussion on the impact of this change on the financial statements.

Significant or Unusual Transactions

We did not identify any significant or unusual transactions or significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus.

Alternative Treatments Discussed with Management

We did not discuss with management any alternative treatments relative to the basis of accounting used by the County, related to material items during the current audit year.

Management's Judgments and Accounting Estimates

Accounting estimates are an integral part of the preparation of financial statements and are based upon management's current judgment. The process used by management encompasses their knowledge and experience about past and current events and certain assumptions about future events. Management may wish to monitor throughout the year the process used to compute and disclose these accounting estimates. The following describes the significant accounting estimates disclosed in the County's December 31, 2010 financial statements:

- Compensated absences: It is the County's policy to permit employees to accumulate certain amounts of vacation and sick leave. The County's policies are discussed in Note I.C. We obtained a list of accumulated vacation and sick time through December 31, 2010 from the County's payroll system, and recalculated vacation and sick time per County policies for a sample of County employees. In addition, we reviewed total compensated absences by analytically comparing the current year results to prior year history. The estimated liability computation follows the guidelines in GASB Statement No. 16, *Accounting for Compensated Absences*. Based on our analyses, we determined the County's estimates for compensated absences to be fairly stated.
- Incurred but not reported claims for workers' compensation and health insurance: The County is self-insured for these risks. Obligations related to claims are based on a past history of claims incurred, and estimates of the lag time between when a claim is filed and paid. We reviewed the County's health insurance liability for claims incurred but not paid at December 31, 2010, in comparison to the historical lag time for claim payments, to ensure amounts projected to be paid after year end were proper. Based on our analyses, we determined the County's estimates for claims payable to be fairly stated.
- Accounting and Financial Reporting by Employers for Post-employment Benefits Other Than Pensions (OPEB): The County sponsors a single-employer defined benefit healthcare plan that provides healthcare benefits to retirees and their dependents, including medical, dental, and vision coverage. The County hires an external actuary to evaluate and estimate the expense/expenditures and related liabilities. See Note IV.C. We obtained the report issued by the actuary, obtaining an understanding of the methods and assumptions used by the actuary as well as evaluating the model used by the actuary for appropriateness and compliance with generally accepted accounting principles. Based on our analysis, we determined the County's estimates for OPEB to be fairly stated.

Audit Adjustments

There were 2 types of audit adjustments to the original trial balance presented to us to begin our audit: 1) to record adjustments to encumbrances and accounts payable to properly recognize current year expenditures, and 2) to properly record year end transactions in the correct year.

Uncorrected Misstatements

There were no uncorrected misstatements accumulated in the current year.

Management Representations

In connection with our audit procedures, we have obtained a written management representation letter. This representation letter constitutes written acknowledgments by management that it has the

primary responsibility for the fair presentation of the financial statements in conformity with the basis of accounting used to prepare the financial statements. The representation letter also includes the more significant oral representations made by officers and employees during the course of the audit and includes specific representations, is intended to reduce the possibility of misunderstandings between us and the County and reminds the signing officers to consider seriously whether all material liabilities, commitments and contingencies or other important financial information have been brought to our attention.

Other Disclosures

We encountered no disagreements with management over the application of significant accounting principles, the basis for management's judgments on any significant matters, the scope of the audit or significant disclosures to be included in the financial statements; we are not aware of any consultations management had with other accountants about accounting or auditing matters; and we did not encounter any difficulties in dealing with management relating to the performance of the audit.

Internal Controls

In planning and performing our audit of the special purpose financial statements of Douglas County as of and for the year ended December 31, 2010, in accordance with auditing standards generally accepted in the United States of America, we considered the County's internal control over financial reporting (internal control) 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 the County's internal control. Accordingly, we do not express an opinion on the effectiveness of the County's internal control.

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over financial reporting that might be significant deficiencies or material weaknesses and therefore, there can be no assurance that all deficiencies, significant deficiencies or material weaknesses have been identified. However, we identified certain deficiencies in internal control that we consider to be significant deficiencies, as discussed below.

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 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.

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. We consider the following control deficiencies to be significant deficiencies:

Segregation of Duties:

- **Payroll Processing:** There is lack of adequate segregation of duties in the payroll function. The payroll clerk has access to add employees, modify master file information, process payroll and post to the general ledger. The clerk also has access to blank checks and the signature stamp software. Additionally, there is no reconciliation currently performed between the data in the payroll system and what is posted to the general ledger. Mitigating controls include the

fact that department heads, the County Treasurer and Assistant County Administrator receive copies of payroll reports for review. Department heads also review timesheets. Additionally, new hires and terminations are approved by the department heads and County Administrator where applicable. We recommend that human resources set up and maintain employee master records and implement an authorization or approval process for changes made to the payroll system through review of the audit tables.

- Health Department: The Director, Director of Administrative Services and the Accountant have access to all areas of QuickBooks. The Accountant processes accounts payable and payroll, with complete access to master files, which would allow for changes in employee and vendor information. The Director of Administrative Services and the Accountant can also post journal entries. Mitigating controls include the fact that all checks require dual signatures, and the Accountant does not have check signing authority or access to the blank check stock. For proper segregation of duties, certain functions should be restricted to avoid conflicts between incompatible functions.
- Journal Entries: Journal entries can be created and posted to the general ledger by the same person. There is no review or approval process of journal entries made, prior to the time they are released. There should be a separation of the creating function and the posting function within the system, or at a minimum, a procedure for conducting a secondary review of journal entries to ensure that undetected manipulation of data on the system does not occur.

Financial Statement Preparation:

- Encumbrances / Commitments: The County does not have a formal purchase order system to ensure that all purchase commitments are recorded at year end. Without a systematic method of gathering this information, there is a risk that purchase commitments will go undetected. Under the statutory basis of accounting, expenditures include cash disbursements, as well as accounts payable and encumbered purchase commitments.
- Year-end Closing Process, Cutoff: In order to ensure that expenditures are reflected in the correct budget year, the County leaves the books open for two months after year end, and posts expenditures back to the prior year if the goods or services were received in that year. When such amounts are recorded, they reduce cash, rather than being recorded as a payable at December 31. The overall approach being used, to assist in capturing expenditures in the appropriate year, is correct; only a minor adjustment to record the amounts as accounts payable rather than as a reduction to cash is needed.

A similar process is also used to capture receipts in the new year that apply to the prior year. These receipts are also recorded in the prior year as increases to cash. Under the County's newly adopted basis of accounting, cash receipts are recognized only as the cash is received. Therefore, these amounts should not be recorded as of December 31. We recommend the County continue to identify and accumulate such information, as this will be needed when the County moves toward recording transactions in accordance with generally accepted accounting principles (GAAP) in future years.

- Year-end Closing Process, Recording Certain Transactions: Certain data required for financial reporting or disclosure purposes is not captured or calculated as part of the year-end financial reporting process. This includes the reconciliation of activity in various cash accounts that are not maintained by the Treasurer's Office, including various accounts for the sheriff, district

attorney and the employee benefit trust account used to pay health claims. Additionally, obligations for incurred-but-not-reported health claims and other post-employment benefits (OPEB) are not calculated for recording in the financial statements or disclosure in the footnotes. We noted that, for the cash accounts, there are generally reviews done of the activity during the year, including monthly bank reconciliations. Additionally, health claims paid are monitored throughout the year. OPEB amounts are based primarily on data provided by an external actuary. We recommend management develop procedures for summarizing the data needed at year-end for accounting and financial reporting purposes.

Closing

This report is intended solely for the information and use of the Board of County Commissioners and management and is not intended to be and should not be used by anyone other than these specified parties. It will be our pleasure to respond to any questions you have regarding this report. We appreciate the opportunity to continue to be of service to Douglas County.

Allen, Gibbs & Houlik, L.C.
CERTIFIED PUBLIC ACCOUNTANTS

Wichita, KS
August 4, 2011