

LETTER OF REPRESENTATION TO BE TYPED ON CLIENT LETTERHEAD
(USE THIS TEMPLATE FOR BARS CASH BASIS AUDITS)

March 18, 2022

Office of the Washington State Auditor
316 W. Boone Ave., Ste. 680
Spokane, WA 99201

To the Office of the Washington State Auditor:

We are providing this letter in connection with your audits of the City of Clarkston for the period from January 1, 2019 through December 31, 2020 for the accountability and financial statement audits and January 1, 2020 through December 31, 2020 for the federal grant compliance audit. Representations are in relation to matters existing during or subsequent to the audit period up to the date of this letter.

Certain representations in this letter are described as being limited to matters that are significant or material. Information is considered significant or material if it is probable that it would change or influence the judgment of a reasonable person.

We confirm, to the best of our knowledge and belief, having made appropriate inquiries to be able to provide our representations, the following representations made to you during your audit. If we subsequently discover information that would change our representations related to this period, we will notify you in a timely manner.

General Representations:

1. We have provided you with unrestricted access to people you wished to speak with and made available all relevant and requested information of which we are aware, including:
 - a. Financial records and related data.
 - b. Minutes of the meetings of the governing body or summaries of actions of recent meetings for which minutes have not yet been prepared.
 - c. Other internal or external audits, examinations, investigations or studies that might concern the objectives of the audit and the corrective action taken to address significant findings and recommendations.
 - d. Communications from regulatory agencies, government representatives or others concerning possible material noncompliance, deficiencies in internal control or other matters that might concern the objectives of the audit.
 - e. Related party relationships and transactions.
 - f. Results of our internal assessment of business risks and risks related to financial reporting, compliance and fraud.

2. We acknowledge our responsibility for compliance with requirements related to confidentiality of certain information, and have notified you whenever records or data containing information subject to any confidentiality requirements were made available.
3. We acknowledge our responsibility for compliance with applicable laws, regulations, contracts and grant agreements.
4. We have identified and disclosed all laws, regulations, contracts and grant agreements that could have a direct and material effect on the determination of financial statement amounts, including legal and contractual provisions for reporting specific activities in separate funds.
5. Except as discussed with you, we have complied with all material aspects of laws, regulations, contracts and grant agreements.
6. We acknowledge our responsibility for establishing and maintaining effective internal controls over compliance with applicable laws and regulations and safeguarding of public resources, including controls to prevent and detect fraud.
7. Except as discussed with you, we have established adequate procedures and controls to provide reasonable assurance of safeguarding public resources and compliance with applicable laws and regulations.
8. We have no knowledge of any loss of public funds or assets or other illegal activity, or any allegations of fraud or suspected fraud involving management or employees.
9. In accordance with RCW 43.09.200, all transactions have been properly recorded in the financial records, notwithstanding immaterial uncorrected items referenced below.
10. We are responsible for, and have accurately prepared, the summary schedule of prior audit findings to include all findings, and we have provided you with all the information on the status of the follow-up on prior audit findings.
11. We are responsible for taking corrective action on audit findings and have developed a corrective action plan.

Additional representations related to the financial statements:

12. We acknowledge our responsibility for fair presentation of the financial statements and believe financial statements are fairly presented in accordance with the *Budgeting, Accounting and Reporting Standards Manual* (BARS Manual), which is a comprehensive basis of accounting other than accounting principles generally accepted in the United States of America.
13. We acknowledge our responsibility for establishing and maintaining effective internal control over financial reporting.
14. The financial statements properly classify all funds and activities.

15. Revenues are appropriately classified by fund and account in accordance with the BARS Manual.
16. Expenses are appropriately classified by fund and account, and allocations have been made on a reasonable basis.
17. Ending cash and investments are properly classified as nonspendable, restricted, committed, assigned, and unassigned.
18. Significant assumptions we used in making accounting estimates are reasonable.
19. The following have been properly classified, reported and disclosed in the financial statements, as applicable:
 - a. Interfund, internal, and intra-entity activity and balances.
 - b. Related-party transactions, including sales, purchases, loans, transfers, leasing arrangements, and guarantees, and amounts receivable from or payable to related parties.
 - c. Joint ventures and other related organizations.
 - d. Guarantees under which the government is contingently liable.
 - e. All events occurring subsequent to the fiscal year end through the date of this letter that would require adjustment to, or disclosure in, the financial statements.
 - f. Effects of all known actual or possible litigation, claims, assessments, violations of laws, regulations, contracts or grant agreements and other loss contingencies.
20. We have accurately disclosed to you all known actual or possible pending or threatened litigation, claims or assessments whose effects should be considered when preparing the financial statements. We have also accurately disclosed to you the nature and extent of our consultation with outside attorneys concerning litigation, claims and assessments.
21. We acknowledge our responsibility to include all necessary and applicable disclosures required by the BARS Manual, including:
 - a. Description of the basis of accounting, summary of significant accounting policies and how this differs from Generally Accepted Accounting Principles (GAAP).
 - b. Disclosures similar to those required by GAAP to the extent they are applicable to items reported in the financial statements.
 - c. Any additional disclosures beyond those specifically required by the BARS Manual that may be necessary for the statements to be fairly presented.
22. We acknowledge our responsibility for reporting supplementary information (the Schedule of Liabilities and the Schedule of Expenditures of Federal Awards) in accordance with applicable requirements and believe supplementary information is fairly presented, in both form and content in accordance with those requirements.

23. We have disclosed to you all significant changes to the methods of measurement and presentation of supplementary information, reasons for any changes and all significant assumptions or interpretations underlying the measurement or presentation.
24. We believe the effects of uncorrected financial statement misstatements summarized below are not material, both individually and in the aggregate, to the financial statements taken as a whole.

| Year | Statement / Schedule | Description |
|-------------|--|--|
| 2019 | Fund Resources and Uses Arising from Cash Transactions | Miscellaneous revenues reported in the financial statements did not agree to the general ledger by \$16,533, which understated both revenues and ending cash and investments. |
| 2019 | Notes to Financial Statements | Actual expenditures for the Sanitation O & M Fund 410 disclosed in the budget note do not agree to the general ledger by \$42,922 (understatement). |
| 2019 | Notes to Financial Statements | The City did not disclose bank deposits in its deposits and investments note and the amounts disclosed in the note do not agree to the financial statements by \$27,111 as the BARS Manual prescribes (overstatement). |
| 2020 | Fund Resources and Uses Arising from Cash Transactions | Difference of approximately \$3,612 between the auditor's expectation of total beginning cash and investments and actual beginning cash and investments reported in the financial statements (overstatement). |
| 2020 | Fund Resources and Uses Arising from Cash Transactions | Difference of approximately \$218,203 between the auditor's expectation of total revenues and actual revenues reported in the financial statements (understatement). |
| 2020 | Fund Resources and Uses Arising from Cash Transactions | Difference of approximately \$232,340 between the auditor's expectation of total expenditures and actual expenditures reported in the financial statements (understatement). |
| 2020 | Fund Resources and Uses Arising from Cash Transactions | Difference of approximately \$491 between the auditor's expectation of total ending cash and investments and actual ending cash and investments reported in the financial statements (overstatement). |
| 2020 | Notes to Financial Statements | Actual expenditures for the Sanitation O & M Fund 410 disclosed in the budget note do not agree to the general ledger by \$47,136 (understatement). |
| 2020 | Notes to Financial Statements | The City did not disclose bank deposits in its deposits and investments note and the amounts disclosed in the note do not agree to the financial statements by \$321,269 as the BARS Manual prescribes (understatement). |

25. We acknowledge our responsibility not to publish any document containing the audit report with any change in the financial statements, supplementary and other information referenced in the auditor's report. We will contact the auditor if we have any needs for publishing the audit report with different content included.
26. We considered the qualifications of the WA Office of the State Actuary (OSA) to create an electronic tool for determining the City's liability for LEOFF 1 other post-employment benefits (OPEB) under the GASB 75 alternative method and agree with the results of the electronic tool, which are reflected in financial statement amounts and disclosures. In using the tool, we input correct and complete information into the electronic spreadsheet, and did not enter any inaccurate information with respect to the amounts or assumptions, or modify cells in the OSA spreadsheet, in an attempt to change the outcome of the calculation. Further, we are not aware of any other external matters that would have had an impact on the appropriateness of using the alternative method or assumptions used by the OSA's tool. We confirm that we are a LEOFF 1 employer and we had fewer than 100 plan members (active and retired) as of the beginning of the reporting period and are, therefore, eligible to use the tool.

Additional representations related to expenditures under federal grant programs:

27. We acknowledge our responsibility for complying, and have complied, with the requirements of 2 CFR § 200 *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*.
28. With regards to your audit of federal grant programs, we have made available all relevant and requested information of which we are aware, including:
 - a. All federal awards and related grant agreements (including amendments, if any), contracts with pass-through entities, service organizations and vendors, and correspondence.
 - b. All communications from federal awarding agencies, vendors, service organizations or pass-through entities concerning possible noncompliance.
 - c. All information regarding corrective actions taken and management decisions or follow-up work performed by federal or pass-through agencies on any findings reported in the past.
 - d. All documentation related to the compliance requirements, including information related to federal program financial reports and claims for advances and reimbursements.
 - e. Interpretations or other support for any situations where compliance with requirements might be questionable or unclear.
29. Except as reported by the audit, we have identified and complied with all direct and material compliance requirements of federal awards.
30. Management is responsible for establishing effective internal control and has, except as reported by the audit, maintained sufficient control over federal programs to provide reasonable assurance that awards are managed in compliance with laws, regulations,

contracts or grant agreements that could have a material effect on each of our federal awards.

31. Federal program financial reports and claims for advances and reimbursements are supported by the accounting records from which the basic financial statements have been prepared, and are prepared on a basis consistent with the Schedule of Expenditures of Federal Awards.
32. Copies of federal program reports provided to you are true copies of the reports submitted, or electronically transmitted, to federal agencies or pass-through agencies, as applicable.
33. We are responsible for, and will accurately prepare, the auditee section of the Data Collection Form as required by the Uniform Guidance.

Monika Lawrence, Mayor

Steve Austin, Clerk Treasurer