AUDIT REPORT

MCCURTAIN COUNTY RURAL WATER DISTRICT #7 GARVIN, OKLAHOMA

OCTOBER 31, 2014



KERSHAW CPA & ASSOCIATES, PC

5300 West Okmulgee Avenue Muskogee, Oklahoma 74401 Phone (918) 684-1040 Fax (918) 684-1041

WEB: KERSHAWCPA.COM E-MAIL: REK@KERSHAWCPA.COM 607 North 1st Street Ponca City, Oklahoma 74601 Phone (580) 762-1040 Fax (580) 762-1047

MCCURTAIN COUNTY RURAL WATER DISTRICT #7 GARVIN, OKLAHOMA OCTOBER 31, 2014

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MCCURTAIN COUNTY RURAL WATER DISTRICT #7 GARVIN, OKLAHOMA OCTOBER 31, 2014

BOARD OF DIRECTORS

Jerry Byassee

Curtis Wheeler

Greg Lancaster

Kelly Ward

Jeff Spencer

Holly Coffman, Manager

5300 West Okmulgee Avenue Muskogee, Oklahoma 74401 Phone (918) 684-1040 Fax (918) 684-1041

WEB: KERSHAWCPA.COM E-MAIL: REK@KERSHAWCPA.COM 607 North 1st Street Ponca City, Oklahoma 74601 Phone (580) 762-1040 Fax (580) 762-1047

INDEPENDENT AUDITOR'S REPORT

To the Board of Directors McCurtain County Rural Water District #7 Garvin, Oklahoma

Report on the Financial Statements

We have audited the accompanying financial statements of McCurtain County Rural Water District #7, as of and for the fiscal year ended October 31, 2014, as listed in the table of contents and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America, and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, and in accordance with Oklahoma Statutes. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the

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WEB: KERSHAWCPA.COM E-MAIL: REK@KERSHAWCPA.COM 607 North 1⁵¹ Street Ponca City, Oklahoma 74601 Phone (580) 762-1040 Fax (580) 762-1047

entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used, and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the McCurtain County Rural Water District #7, as of October 31, 2014, and the respective changes in financial position and, where applicable, cash flows thereof for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Other Matters

Required Supplementary Information

McCurtain County Rural Water District #7 has implemented the general provisions of the Governmental Accounting Standards Board (GASB) Statement No. 34. However the District has not presented the Management's Discussion and Analysis required by the Governmental Accounting Standards Board (GASB) that the GASB has determined is necessary to supplement, although not required to be part of, the basic financial statements.

Supplementary and Other Information

The introductory section listed in the accompanying table of contents is presented for the purpose of additional analysis and is not a required part of the basic financial statements of the District. Such additional information has not been subjected to the auditing procedures applied in our audit of the basic financial statements, and

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accordingly, we do not express an opinion or provide any assurance on it.

Other Reporting Required by Government Auditing Standards

In accordance with Government Auditing Standards, we have also issued our report dated May 1, 2015, on our consideration of the McCurtain County Rural Water District #7's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with Government Auditing Standards in considering McCurtain County Rural Water District **#7's** internal control financial over reporting and compliance.

Keve how CPA \$ Associates, P.C.

Kershaw, CPA & Associates, PC

May 1, 2015

EXHIBIT A

MCCURTAIN COUNTY RURAL WATER DISTRICT #7 GARVIN, OKLAHOMA STATEMENT OF NET POSITION OCTOBER 31, 2014

0010BER 31, 2014	2014	Memo Only 2013
ASSETS		
CURRENT ASSETS: Cash Certificates of Deposit	\$ 210,054 276,593	\$ 168,405 276,198
Certificate of Deposit - Restricted	41,676	41,676
Accounts Receivable Prepaid Insurance	36,661 5,547_	61,764 5,684_
Total Current Assets	570,530	553,727
CAPITAL ASSETS: Land	3,000	3,000
Buildings	62,225	62,225
Vehicles	32,700	32,700
Office Equipment	10,696	10,696
Water Distribution System	1,658,628	1,623,698
Less: Accumulated Depreciation	(892,917)	(837,747)
Net Capital Assets	874,332	894,572
TOTAL ASSETS	\$ 1,444,862	\$ 1,448,299
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LIABILITIES & NET POSITION		
CURRENT LIABILITIES:		
Accounts Payable	\$ 9,473	\$ 9,273
Payroll Taxes Payable	116	117
Refundable Deposits	-	-
Accrued Interest Payable	614	726
Current Maturities of Long-Term Debt	33,288	31,668
Total Current Liabilities	43,491	41,784
LONG-TERM LIABILITIES:	170.010	000.070
Note Payable	172,310	203,979
Less: Current Maturities of Long-Term Debt	(33,288)	(31,668)
Total Long-Term Liabilities	139,022	172,311
TOTAL LIABILITIES	182,513	214,095
NET POSITION: Net investment in capital assets	702,022	690,593
Restricted for debt service	41,676	41,676
Unrestricted	518,651	501,935
Unrestricted	510,051	
TOTAL NET POSITION	1,262,348	1,234,204
TOTAL LIABILITIES AND NET POSITION	\$ 1,444,862	\$ 1,448,299

See Accountant's Audit Report & Notes Which Accompany These Financial Statements

MCCURTAIN COUNTY RURAL WATER DISTRICT #7 GARVIN, OKLAHOMA STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION FOR THE TWELVE MONTHS ENDED OCTOBER 31, 2014

	2014	Memo Only 2013
OPERATING REVENUES:		
Water Sales	\$ 392,822	\$ 429,052
Other	14,439	12,460
TOTAL OPERATING REVENUES	407,262	441,512
COST OF SALES:		
Water Purchases	(129,061)	(134,165)
GROSS PROFIT	278,200	307,347
OPERATING EXPENSES:		
Salaries	37,200	37,200
Contract Labor	61,705	54,412
Fringe Benefits	6,592	7,246
Payroll Taxes	3,341	3,047
Repairs & Maintenance	8,521	3,900
Materials & Supplies	26,634	33,048
Fuel	2,639	3,000
Insurance	10,229	8,488
Utilities	6,288	6,035
Membership Dues & Licenses	1,010	1,891
Professional Fees	1,800	1,800
Office	8,653	7,920
Training & Meetings	3,013	2,947
Travel	942	2,347
Other	3,636	3,020
Fire Collection Fees	4,850	4,962
Depreciation	55,170	50,104
TOTAL OPERATING EXPENSES	242,223	231,367
NET OPERATING INCOME (LOSS)	35,977	75,980
OTHER REVENUES (EXPENSES):		
Interest Income	1,534	2,719
Interest Expense	(9,367)	(10,914)
Grant Income	-	15,000
Gain (Loss) on Sale of Capital Assets	<u> </u>	17,819
NET INCOME (LOSS)	28,145	100,605
TOTAL NET POSITION, Beginning of Year	1,234,204	1,141,192
TOTAL NET POSITION, Prior Year Adjustment		(7,593)
TOTAL NET POSITION, End of Year	\$ 1,262,348	\$ 1,234,204

See Accountant's Audit Report & Notes Which Accompany These Financial Statements

MCCURTAIN COUNTY RURAL WATER DISTRICT #7 GARVIN, OKLAHOMA STATEMENT OF CASH FLOWS FOR THE TWELVE MONTHS ENDED OCTOBER 31, 2014

		2014	Me	morandum Only 2013
Cash Flows from Operating Activities:	•	100.005	•	445 044
Cash Receipts from Customers	\$	432,365	\$	415,244
Payments to Suppliers for Goods & Services Customer Deposits Received, Net of Refunded		(315,777) -		(316,040) -
Net Cash Provided (Used) by Operating Activities		116,587		99,204
Cash Flows from Capital & Related Financing Activities:				
Additions to Capital Assets		(34,930)		(99,120)
Proceeds from sale of Capital Assets		-		17,900
Grant Income		-		15,000
Principal Payments on Long-Term Debt		(31,669)		(30,127)
Interest Expense		(9,480)		(11,021)
Net Cash Provided (Used) by Capital & Related Financing Activities		(76,078)		(107,368)
Cash Flows from Investing Activities:				
(Increase)Decrease in Investments		(395)		(435)
Interest Income		1,534		2,719
Net Cash Provided (Used) by Investing Activities		1,139		2,284
Net Increase (Decrease) in Cash and Cash Equivalents		41,649		(5,880)
Cash & Cash Equivalents, Beginning of Year		168,405		181,878
Cash & Cash Equivalents, Prior Year Adjustment		-		(7,593)
Cash & Cash Equivalents, End of Year	\$	210,054	\$	168,405
Reconciliation of operating income (loss) to net cash provided operating activities:				
Net Operating Income (Loss)	\$	35,977	\$	75,980
Adjustments to reconcile operating income (loss) to net cash provided (used) by operating activities				
Depreciation		55,170		50,104
(Increase)Decrease in Accounts Receivable		25,103		(26,268)
(Increase)Decrease in Prepaid Insurance		137		(353)
Increase(Decrease) in Accounts Payable		200		(277)
Increase(Decrease) in Payroll Taxes Payable		(1)		19
Increase(Decrease) in Refundable Deposits		-		-
Net Cash Provided (Used) by Operating Activities	\$	116,587	\$	99,204

See Accountant's Audit Report & Notes Which Accompany These Financial Statements

NOTE 1 -SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Reporting Entity

McCurtain County Rural Water District No. 7 (the "District") was incorporated under the laws of the State of Oklahoma in accordance with Title Eight-Two of the Oklahoma Statutes, as a subdivision of the State of Oklahoma. The District operates and maintains a water treatment and distribution system within McCurtain County, Oklahoma, and provides potable water services to members of the District.

Basis of Presentation

The Enterprise Fund is used to account for the operations of the District that are financed and operated in a manner similar to private business enterprises where the intent is that costs or providing goods or services be recovered in whole or part through user fees or charges.

Basis of Accounting

Basis of accounting refers to when revenues and expenditures are recognized in the accounts and reported in the financial statements. The District utilizes the accrual basis of accounting, which is in accordance with U.S. generally accepted accounting principles. Revenues are recognized when earned and expenses when incurred.

<u>Budgetary Data</u>

As required by the loan agreement with the USDA Rural Development, the District prepares an annual budget.

<u>Assets, Liabilities, & Equity</u>

Cash and Cash Equivalents

For purposes of the statement of cash flows, cash and cash equivalents consist of cash in the checking and savings accounts. All funds are deposited in institutions insured by FDIC. Deposits are carried at cost.

Accounts Receivable

Accounts receivable represent customer billings for water sales, which were due and owing at the FYE date.

The direct write-off method is used to account for uncollectible receivables. The balance at October 31, 2014 is considered fully collectible.

Property, Plant and Equipment

Purchases of assets with estimated useful lives exceeding oneyear are capitalized at cost and depreciated over the estimated useful life of the asset using the straight-line method. Estimated useful lives range from 5 to 40 years. The capitalization threshold has been set at \$1,500.00.

Long-Term Debt

Long-term debt is reported at face value, net of applicable discounts and deferred loss on refunding. Costs related to the issuance of debt are deferred and amortized over the lives of various debt issues.

Equity Classification

Equity is classified as net position and displayed in three components:

- 1. Net investment in capital assets Consists of capital assets including restricted capital assets, net of accumulated depreciation and reduced by the outstanding balances of any bonds, mortgages, notes, or other borrowings that are attributable to the acquisition, construction, or improvements of those assets and adjusted for any deferred inflows and outflows of resources attributable to capital assets and related debt.
- Restricted Consists of restricted assets reduced by liabilities and deferred inflows or resources related to those assets, with restriction constraints placed on the use either by (a) external groups such as creditors, grantors, contributors, or laws and regulations of other governments; or (b) law through constitutional provisions or enabling legislation.
- 3. Unrestricted Net amount of assets, deferred outflows of resources, liabilities, and deferred inflows of resources that are not included in the determination of net investment in capital assets or the restricted component of net position.

It is the District's policy to first use restricted net resources prior to the use of unrestricted net resources when an expense is incurred for purposes for which both restricted and unrestricted net resources are available.

Revenues, expenditures & expenses

Operating revenues and expenses for proprietary funds result from providing services and producing and delivering goods and/or services.

They also include all revenues and expenses not related to capital and related financing, noncapital financing, or investing activities.

Governmental Accounting Standards Board Statement No. 34

In June 1999, the Governmental Accounting Standards Board (GASB) unanimously approved Statement No. 34, Basic Financial Statements - and Management's Discussion and Analysis - for State and Local Governments. Certain of the significant changes in the Statement include the following:

- 1. For the first time the financial statement should include:
- a. A Management Discussion and Analysis (MD&A) section providing analysis of the District's overall financial position and results of operations. However, the District has chosen not to present the required MD&A for the current year.
- b. Financial statements prepared using full accrual accounting for all of the District's activities, except for including the General capital assets or infrastructure (lines, pump stations, etc.).
- 2. A change in the fund financial statements to focus on major funds.

These and other changes are reflected in the accompanying financial statements (including the notes to the financial statements). The District has elected to implement the general provisions of the Statement in the current year and report infrastructure acquired after October 31, 2003 as provided by GASB standards.

<u>Income Taxes</u>

The District is exempt from income taxes under Section 501(c)(12) of the Internal Revenue Code.

Compensated Absences

The organization does not accrue a liability for compensated absences. This is not in accordance with generally accepted accounting principles. However, because of the limited number of people employed by the organization, any liability for compensated absences at October 31, 2014 would not be material to the financial statements taken as a whole.

<u>Estimates</u>

The preparation of financial statements, in conformity with generally accepted accounting principles, requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

<u>Memorandum Totals</u>

The "Memorandum Only" captions above the total columns mean that totals are presented for overview information purposes only.

NOTE 2 - STEWARDSHIP, COMPLIANCE AND ACCOUNTABILITY

As a local government unit, the District is subject to various federal, state, and local laws and contractual regulations. In accordance with Government Auditing Standards, the auditor has issued a report on his consideration of the District's internal control over financial reporting and tested its compliance with certain provisions of laws, regulations, contracts and grants. That report is an integral part of an audit performed in compliance with Government Auditing Standards and should be read in conjunction with this report in considering the results of the audit.

Finance-related Legal & Contractual Provisions

As described in Note 4, the District was in compliance with the reserve requirement of the Rural Development loan agreement.

Deficit Fund Balance or Retained Earnings

As indicated in the financial statements, there are no fund balance or retained earnings deficits for the District for this fiscal year.

NOTE 3 - CASH AND INVESTMENTS

Custodial Credit Risk

At October 31, 2014, the District held deposits of approximately \$527,878 at financial institutions. The District's cash deposits, including interest-bearing certificates of deposit are covered by Federal Depository Insurance (FDIC) or direct obligation of the U.S. Government insured or collateralized with securities held by the District or by its agent in the District's name.

Investment Interest Rate Risk

The District does not have a formal investment policy that limits investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates.

Investment Credit Risk

The District has no policy that limits its investment choices other than the limitation of state law as follows:

- a. Direct obligations of the U.S. Government, its agencies and instrumentalities to which the full faith and credit of the U.S. Government is pledged, or obligations to the payment of which the full faith and credit of the State is pledged.
- b. Certificates of deposits or savings accounts that are either insured or secured with acceptable collateral with in-state financial institutions, and fully insured certificates of deposit or savings accounts in out-of-state financial institutions.
- c. With certain limitation, negotiable certificates of deposit, prime bankers' acceptances, prime commercial paper and repurchase agreements with certain limitations.
- d. County, municipal or school district tax supported debt obligations, bond or revenue anticipation notes, money judgments, or bond or revenue anticipation notes of public trusts whose beneficiary is a county, municipality or school district.
- e. Notes or bonds secured by mortgage or trust deed insured by the Federal Housing Administrator and debentures issued by the Federal Housing Administrator, and in obligations of the National Mortgage Association.
- f. Money market funds regulated by the SEC and in which investments consist of the investments mentioned in the previous paragraphs (a.-d.).

NOTE 4 - RESTRICTED ASSETS

Debt service for the note is secured with a certificate of deposit from Idabel National Bank. The certificate of deposit had a balance of \$41,676 at October 31, 2014.

NOTE 5 - CAPITAL ASSETS

Capital asset activity, for the fiscal year ended October 31, 2014, was as follows:

	Ba	lance at					Ba	alance at
	Oct.	. 31, 2013	A	Additions Deductio		ctions	0ct	. 31, 2014
Land	\$	3,000	\$	-	\$	-	\$	3,000
Buildings		62,225		-		-		62,225
Vehicles		32,700		-		-		32,700
Office Equipment		10,696		-		-		10,696
Water Distribution								
System		1,623,698		34,930		-		1,658,628
Subtotal		1,732,319		34,930		-		1,767,249
Less: Accum. Depr.		(837,747)		(55,170)		-		(892,917)
Total Capital Assets								
(Net of Depreciation)	\$	894,572	\$	(20,240)	\$	-	\$	874,332

During the year, the District expended \$34,930 as the final payment for the Clear Creek Project.

NOTE 6 - LONG-TERM DEBT

The District's long-term debt consists of a note payable to the USDA Rural Development. The note was obtained September 5, 1979, at an interest rate of 5%, with monthly payments of \$3,429. The note is secured by cash, investments and property of the District, including all real and personal property.

Changes in Long-Term Debt

The following is a summary of changes in long-term debt for the year ended October 31, 2014:

	Ba	lance at					Ba	lance at
	October 31,					0c1	tober 31,	
		2013	Additions [Deductions		2014	
Note Payable – USDA RD	\$	203,979	\$	-	\$	(31,669)	\$	172,310
Total Long–Term Debt	\$	203,979	\$	-	\$	(31,669)	\$	172,310

Debt Services Requirements to Maturity

The annual debt service requirements to maturity, including principal and interest, for long-term debt, as of October 31, 2014, are as follows:

Year Ending October 31,	P	rincipal	Ir	nterest	Total
2015	\$	33,288	\$	7,860	\$ 41,148
2016		34,992		6,156	41,148
2017		36,782		4,366	41,148
2018		38,664		2,484	41,148
2019		28,584		572	29,156
2020-2024		-		-	-
Total	\$	172,310	\$	21,438	\$ 193,748

NOTE 7 - FUND EQUITY

As described in Note 1 above, equity is classified as net position and displayed in three components:

- 1. Net investment in capital assets
- 2. Restricted
- 3. Unrestricted

The restrictions on net position are described in Note 4 above.

NOTE 8 - CONTINGENCIES

<u>Litigation</u>

According to management there were no known contingent liabilities at October 31, 2014, which would have a material effect on the financial statements.

Federally Assisted Programs

In the normal course of operations, the District participates in various federal or state/loan programs from year to year. The grant/loan programs are often subject to additional audits by agents of the granting or loaning agency, the purpose of which is to ensure compliance with the specific conditions of the grant or loan. Any liability of reimbursement that may arise as a result of these audits cannot be reasonably determined at this time, although it is believed the amount, if any, would not be material.

NOTE 9 - SUBSEQUENT EVENTS

The District did not have any subsequent events through May 1, 2015, which is the date the financial statements were issued, for events requiring recording or disclosure in the financial statements for the year ending October 31, 2014.

5300 West Okmulgee Avenue Muskogee, Oklahoma 74401 Phone (918) 684-1040 Fax (918) 684-1041

WEB: KERSHAWCPA.COM E-MAIL: REK@KERSHAWCPA.COM 607 North 1st Street Ponca City, Oklahoma 74601 Phone (580) 762-1040 Fax (580) 762-1047

REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

To the Board of Directors McCurtain County Rural Water District #7 Garvin, Oklahoma

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, and in accordance with Oklahoma Statutes, the financial statements of the McCurtain County Rural Water District #7, as of and for the year ended October 31, 2014, and the related notes to the financial statements, and have issued our report thereon dated May 1, 2015. The McCurtain County Rural Water District #7 has implemented the general provisions of the Governmental Accounting Standards Board (GASB) Statement No. 34, except that the District did not present the required MD&A.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered the McCurtain County Rural Water District #7's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances 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 McCurtain County Rural Water District #7's internal control. Accordingly, we do not express an opinion on the effectiveness of McCurtain County Rural Water District #7's internal control.

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 entity's financial statements will not be prevented, or detected and corrected on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material

5300 WEST OKMULGEE AVENUE MUSKOGEE, OKLAHOMA 74401 PHONE (918) 684-1040 FAX (918) 684-1041

WEB: KERSHAWCPA.COM E-MAIL: REK@KERSHAWCPA.COM 607 North 1^{5т} Street Ponca City, Oklahoma 74601 Phone (580) 762-1040 Fax (580) 762-1047

weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified. We did identify certain deficiencies in internal control described in the accompanying Schedule of Findings that we consider to be significant deficiencies. Those deficiencies are listed as Item 14-01.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the McCurtain County Rural Water District #7's financial statements are free of material misstatement, we performed tests of compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under Government Auditing Standards.

McCurtain County Rural Water District #7's Response to Findings

McCurtain County Rural Water District #7's response to the findings identified in our audit is described in the accompanying Schedule of Findings. McCurtain County Rural Water District #7's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

Purpose of this Report

This report is intended solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Keve how CPA \$ Associates, P.C.

Kershaw, CPA & Associates, PC

May 1, 2015

MCCURTAIN COUNTY RURAL WATER DISTRICT #7 SCHEDULE OF FINDINGS OCTOBER 31, 2014

INTERNAL CONTROL FINDINGS:

Item 14-01: Segregation of Duties

<u>Criteria:</u> A good system of internal control requires a proper segregation of duties to prevent one person from being in a position to authorize, execute, and record the same transaction.

<u>Condition:</u> Due to the size of the District's major areas of internal control, that would be prevalent in a larger District, such segregation of duties is not available for this size operation. Duties are concentrated in the hands of the Manager, who is responsible for all phases of the accounting functions. Because of this lack of division of responsibility, internal control is determined to be weak, and in some instances, nonexistent.

<u>Cause/Effect:</u> Due to the limited number of personnel, a breach of internal controls could occur and not be detected in the normal course of operations.

<u>Recommendation:</u> Some compensating controls have been implemented by requiring the Boards approval and signature for all expenditures. The Board should continue to be actively involved in the operations of the organization.

<u>Response:</u> The Board continues to be actively involved in the operations of the District.

COMPLIANCE FINDINGS:

None