

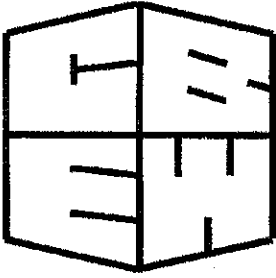
**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**BASIC FINANCIAL STATEMENTS
June 30, 2024**

**RURAL WATER DISTRICT #3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

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Charles E. Crooks, Jr., CPA – Trisha J. Rieman, CPA – Gabrielle Conchola, CPA

INDEPENDENT AUDITOR'S REPORT

July 25, 2024

Board of Directors
Rural Water District No. 3
Pawnee and Payne County
Pawnee, Oklahoma

Opinions

We have audited the accompanying financial statements of the business-type activities of Rural Water District No. 3, Pawnee and Payne County, Pawnee, Oklahoma (the District), as of and for the years ended June 30, 2024 and 2023, and the related notes to the financial statements, as listed in the table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects the financial position of the business-type activities of the Rural Water District No. 3, Pawnee and Payne County, Pawnee, Oklahoma as of June 30, 2024 and 2023, and the changes in financial position-modified cash basis and cash flows-modified cash basis, thereof for the years then ended in accordance with the basis of accounting as described in Note 1.

Basis for Opinions

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. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the District and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Basis of Accounting

We draw attention to Note 1 of the financial statements, which describes the basis of accounting. The financial statements are prepared on the modified cash basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to that matter.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with the modified cash basis of accounting described in Note 1; this includes determining that the modified cash basis of accounting is an acceptable basis for the preparation of the financial statements in the circumstances; this includes 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.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the District's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards and *Government Auditing Standards*, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit 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 District's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the District's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated July 25, 2024, on our consideration of the Rural Water District No. 3's internal control over financial reporting and on 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 results of that testing, and not to provide an opinion on the effectiveness of the District's 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 the Rural Water District No. 3's internal control over financial reporting and compliance.

CBEW Professional Group, LLP

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Certified Public Accountants
Cushing, Oklahoma

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**STATEMENT OF NET POSITION
MODIFIED CASH BASIS
June 30, 2024 and 2023**

	<u>June 30, 2024</u>	<u>June 30, 2023</u>
Assets:		
Cash and cash equivalents (Note 1)	\$ 206,203	\$ 240,607
Investments	414,432	301,925
Receivables (net of allowance for uncollectible)	-	-
Prepaid insurance	-	-
Capital assets:		
Water system, improvements and equipment, net of depreciation	<u>136,926</u>	<u>143,380</u>
Total assets	<u>757,561</u>	<u>685,912</u>
Liabilities:		
Customer deposits	<u>-</u>	<u>-</u>
Total liabilities	<u>-</u>	<u>-</u>
Net position:		
Net Investment in capital assets	136,926	143,380
Unrestricted	<u>620,635</u>	<u>542,532</u>
Total net position	<u>\$ 757,561</u>	<u>\$ 685,912</u>

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

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**STATEMENT OF ACTIVITIES
MODIFIED CASH BASIS
For the Years Ended June 30, 2024 and 2023**

	<u>June 30, 2024</u>	<u>June 30, 2023</u>
Revenues:		
Water sales	\$ 435,672	\$ 416,776
Membership income	6,000	4,000
Miscellaneous income	238	1,764
Total revenues	<u>441,910</u>	<u>422,540</u>
Expenses:		
Accounting and legal	3,500	2,800
Advertising	-	36
Contract services	-	-
Depreciation	28,954	28,391
Dues and subscriptions	-	-
Insurance	15,739	15,371
Lab tests	4,770	4,040
Licenses and permits	-	-
Miscellaneous	863	1,556
Office supplies and postage	2,527	3,264
Payroll taxes	5,683	5,109
Rent	3,600	3,600
Repair and maintenance	1,886	2,758
Salaries	66,492	63,511
Supplies	31,796	30,818
Subcontractor labor	-	-
Telephone	3,412	3,819
Travel	1,800	1,800
Utilities	2,955	3,029
Water purchases	212,328	184,605
Total expenses	<u>386,305</u>	<u>354,507</u>
Operating income (loss)	<u>55,605</u>	<u>68,033</u>
Other income and expense:		
Interest income	16,044	4,169
Donation of capital asset	-	-
Total other income and expense	<u>16,044</u>	<u>4,169</u>
Net income (loss)	71,649	72,202
Net position - beginning of year	<u>685,912</u>	<u>613,710</u>
Net position - end of year	<u>\$ 757,561</u>	<u>\$ 685,912</u>

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

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**STATEMENT OF CHANGES IN NET POSITION
MODIFIED CASH BASIS
For the Years Ended June 30, 2024 and 2023**

	<u>Net Position (Unrestricted)</u>	<u>Net Position (Temporarily Restricted)</u>	<u>Total Net Position</u>
Balance - beginning of year 6-30-23	\$ 685,912	\$ -	\$ 685,912
Change in net position	<u>71,649</u>	<u>-</u>	<u>71,649</u>
Balance - end of year 6-30-24	<u>\$ 757,561</u>	<u>\$ -</u>	<u>\$ 757,561</u>
Balance - beginning of year 6-30-22	\$ 613,710	\$ -	\$ 613,710
Change in net position	<u>72,202</u>	<u>-</u>	<u>72,202</u>
	-	-	-
Balance - end of year 6-30-23	<u>\$ 685,912</u>	<u>\$ -</u>	<u>\$ 685,912</u>

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

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**STATEMENT OF CASH FLOWS
MODIFIED CASH BASIS
For the Years Ended June 30, 2024 and 2023**

	<u>June 30, 2024</u>	<u>June 30, 2023</u>
Cash flows from operating activities:		
Cash received from customers	\$ 441,910	\$ 422,541
Cash payments to suppliers for goods and contractors and other services	<u>(357,351)</u>	<u>(326,117)</u>
Net cash provided by operating activities	<u>84,559</u>	<u>96,424</u>
Cash flows from capital and related financing activities:		
Acquisition & construction of capital assets	(22,500)	-
Principal paid on debt	-	-
Interest paid on debt	-	-
Contributions of assets	-	-
Net cash used in capital and related financing activities	<u>(22,500)</u>	<u>-</u>
Cash flows from investing activities:		
(Purchase) liquidation of investments	(112,507)	(301,925)
Interest income	16,044	4,169
Net cash provided by investing activities	<u>(96,463)</u>	<u>(297,756)</u>
Net increase (decrease) in cash	(34,404)	(201,332)
Cash and cash equivalents at beginning of year	<u>240,607</u>	<u>441,939</u>
Cash and cash equivalents at end of year	<u>\$ 206,203</u>	<u>\$ 240,607</u>
Reconciliation of operation income to net cash provided by operating activities:		
Operating income (loss)	\$ 55,605	\$ 68,033
Adjustments to reconcile net income to net cash provided by operating activities:		
Depreciation	28,954	28,391
Changes in assets and liabilities:		
Increase (decrease) in customer deposits	<u>-</u>	<u>-</u>
Total adjustments	<u>28,954</u>	<u>28,391</u>
Net cash provided by operating activities	<u>\$ 84,559</u>	<u>\$ 96,424</u>

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

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS
June 30, 2024 and 2023**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Rural Water District No. 3, Pawnee and Payne County, Oklahoma (the District), was created under the provisions of Title 82, O.S. 1981, Sections 1324.1-1324.26 inclusive, for the purpose of providing water to the members it serves. Membership in the water district consists of water users who have paid the required membership and connection fees. The District is exempt from federal and state income taxes.

The membership consists of approximately 471 users, each entitled to one vote. The Board of Directors consists of 7 members serving 3-year terms. The vacant Board seats are elected at the annual meeting in July, and following, the Board of Directors meet and elect a chairman, vice-chairman, and secretary-treasurer. All Board members serve without pay.

The more significant of the government's accounting policies are described below.

A. Reporting Entity

Rural Water District No. 3 is an independent, self-contained reporting entity with no associated component units. It is operated in a manner similar to a private business enterprise where the cost (expenses, including depreciation) of providing water services is financed through user charges. The District purchases all of its water from Lone Chimney Water Association.

B. Measurement Focus, Basis of Accounting and Basis of Presentation – Fund Accounting

The accompanying financial statements have been prepared on the modified cash basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America. The accounting and financial reporting treatment is accounted for on a flow of economic resources measurement focus. With this measurement focus, all assets and liabilities associated with the operation are included on the statement of net position. The operating statements present increases (e.g., revenues) and decreases (e.g., expenses) in net total assets. Depreciation expense is provided for capital assets based upon estimated useful lives.

Financial activity is accounted for on the flow of economic resources measurement focus using the modified cash basis of accounting. Under this method, revenues are recorded when received and expenditures are recorded when paid.

C. Assets, Liabilities and Equity

1. Deposits and Investments

Oklahoma Statutes authorize the District to invest in certificates of deposit, repurchase agreements, passbooks, bankers' acceptances, and other available bank investments provided that all deposits are fully covered by approved securities pledged to secure those funds. In addition, the District can invest in direct debt securities of the United States unless such an investment is expressly prohibited by law.

All the bank deposits are held at one financial institution and are carried at cost. For purposes of statements of cash flows, the District considers cash and all highly liquid investments with an initial maturity of three months or less to be cash equivalents.

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS
June 30, 2024 and 2023**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

C. Assets, Liabilities and Equity (Continued)

1. Deposits and Investments (Continued)

Custodial Credit Risk

At June 30, 2024 and 2023, the District held deposits of approximately \$620,635 and \$542,532 at financial institutions. The District's cash deposits, including interest-bearing certificates of deposit, are entirely 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.).

The investments held at June 30, 2024 are as follows:

Type	Weighted Average Maturity (Months)	Credit Rating	Market Value	Cost
Investments				
CDs	10 month		\$ 414,432	\$ 414,432
Money Market	N/A	AAAm	206,203	206,203
Total investments			<u>\$ 620,635</u>	<u>\$ 620,635</u>

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS
June 30, 2024 and 2023**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

C. Assets, Liabilities and Equity (Continued)

1. Deposits and Investments (Continued)

Concentration of Investment Credit Risk

The District places no limit on the amount it may invest in any one issuer. The District has the following of credit risk: 56% in CDs (\$414,432) and 44% in Money Market funds (\$206,203).

2. Fair Value of Financial Instruments

The District's financial instruments include cash and cash equivalents, accounts receivable, accounts payable and notes payable. The District's estimate of the fair value of all financial instruments does not differ materially from the aggregate carrying values of its financial instruments recorded in the accompanying statement of net position. The carrying amount of these financial instruments approximates fair value because of the short maturity of these instruments.

3. Estimates

The preparation of financial statements on the modified cash basis of accounting requires management to make estimates and assumptions that affect certain reported amounts assets and liabilities, and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Accordingly, actual results could differ from those estimates.

4. Inventories

Inventories consist primarily of water stored in lines for use in the distribution process. Inventory is expensed when purchased.

5. Capital Assets

Additions to the water storage delivery system and other equipment are recorded at cost or, if contributed property, at their estimated acquisition value at time of contribution. Repairs and maintenance are recorded as expenses; renewals and betterments are capitalized. The District maintains a capitalization threshold of \$500 and an estimated useful life in excess of two (2) years.

The District reviews its investment in real estate for impairment whenever events or changes in circumstances indicate that the carrying value of such property may not be recoverable. Recoverability is measured by a comparison of the carrying amount of the real estate to the future net undiscounted cash flow expected to be generated by the property and any estimated proceeds from the eventual disposition of the real estate. If the real estate is considered to be impaired, the implement to be recognized is measured at the amount by which the carrying amount of the real estate exceeds the fair value of such property. There were no impairment losses recognized in 2024 and 2023.

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS
June 30, 2024 and 2023**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

C. Assets, Liabilities and Equity (Continued)

5. Capital Assets (Continued)

Depreciation has been calculated on each class of depreciable property using the straight-line method. Estimated useful lives are as follows:

Water system	40 years
Equipment	10 years
Office equipment	10 years

6. Compensated Absences

It is the District's policy to permit employees to accumulate earned but unused vacation time. Full-time employees are granted vacation and sick leave benefits in varying amounts to specified maximums depending on tenure. The District has not accrued compensated absences because the amount, if any, would not be material to the financial statements.

7. Net Position

In the basic financial statements, net position represents the difference between assets and liabilities. Net position invested in capital assets, net of related debt, consists of capital assets, net of accumulated depreciation, reduced by the outstanding balances of any borrowing used for the acquisition, construction, or improvement of those assets.

8. Resource Use Policy

It is in the District's policy for all funds that when an expenditure/expense is incurred for purposes for which both restricted and unrestricted resources, including net positions, are available, the District considers unrestricted amounts to be spent first before any restricted amounts are used.

D. Revenues, Expenses and Other Changes in Net Position

1. Operating Revenues and Expenses

Operating revenues and expenses are principally from water sales and connection fees charged to new system subscribers. Customer water consumption is determined by monthly meter readings taken by the District personnel. The water sales from subscriber water consumption received by the District's year-end are recognized as revenue in the current year. Operating expense consist of those costs necessary to operate and maintain the water distribution system and for general administration of the District.

2. Non-Operating Revenue and Expenses

Non-operating revenues and expenses consist of investment earnings, interest expense incurred on the District's notes payable and gains and losses on sales or the abandonment of long-lived assets.

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS
June 30, 2024 and 2023**

2. CAPTIAL ASSETS

The following is a summary of changes in property, plant and equipment.

	Balance June 30, 2023	Additions	Deletions	Balance June 30, 2024
Water system	\$ 848,381	\$ -	\$ -	\$ 848,381
Equipment	156,778	22,500	-	179,278
Vehicles	27,900	-	-	27,900
Total	<u>1,033,059</u>	<u>22,500</u>	<u>-</u>	<u>1,055,559</u>
Less accumulated depreciation	889,679	28,954	-	918,633
Net	<u>\$ 143,380</u>	<u>\$ (6,454)</u>	<u>\$ -</u>	<u>\$ 136,926</u>

	Balance June 30, 2022	Additions	Deletions	Balance June 30, 2023
Water system	\$ 848,381	\$ -	\$ -	\$ 848,381
Equipment	156,778	-	-	156,778
Vehicles	27,900	-	-	27,900
Total	<u>1,033,059</u>	<u>-</u>	<u>-</u>	<u>1,033,059</u>
Less accumulated depreciation	861,288	28,391	-	889,679
Net	<u>\$ 171,771</u>	<u>\$ (28,391)</u>	<u>\$ -</u>	<u>\$ 143,380</u>

3. RISK MANAGEMENT

Rural Water District No. 3 is exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions; injuries to employees; and natural disasters. The District continues to carry commercial insurance for these risks, including general and auto liability, property damage, and public officials' liability. Settled claims resulting from these risks have not exceeded the commercial insurance coverage in any of the past three fiscal years.

4. WATER PURCHASE COMMITMENT

The governing board of Rural Water District No. 3, Pawnee and Payne County, Pawnee, Oklahoma, together with five other cities and water districts located in Noble, Pawnee, and Payne Counties, Oklahoma, have jointly formed Lone Chimney Water Association. The purpose of the Association is to provide a water system for the benefit of its members and other users. The District has entered into various loan agreements with the United States Department of Agriculture, Rural Development and the Oklahoma Water Resources board to provide financing for the facility. Under the terms of the agreement regarding Rural Water District No. 3, each member has contracted to purchase a minimum amount of water from the Association during the 40-year term of the notes. In addition, each individual member is proportionately liable for any debts that exceed the assets of the Association to the extent of one and one-half times the percentage of ownership interest held by the entity pursuant to the agreement. The District is contingently liable for 11.74% of the obligations of the Association, which total approximately \$3,230,730 to the Oklahoma Water Resources Board at the year-end. The District's contingent share of Lone Chimney Water Association's debt is \$379,194.

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS
June 30, 2024 and 2023**

4. WATER PURCHASE COMMITMENT (Continued)

At June 30, 2024, Rural Water District No. 3 was obligated to purchase a minimum of 30 million gallons of water annually, currently at a cost of \$204,000. The rates charged for the water can be adjusted as necessary to provide sufficient revenues for the Association.

Future purchase commitments at current rates are as follows:

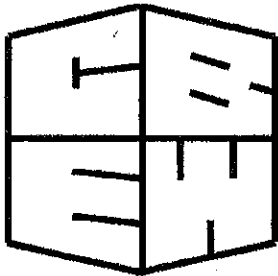
<u>June 30,</u>	<u>Amounts Due</u>
2025	\$ 204,000
2026	204,000
2027	204,000
2028	204,000
2029	204,000
2030-2031	408,000
Total	<u>\$ 1,428,000</u>

5. RESTATEMENT OF NET POSITION

Due to the change from GAAP to modified-cash basis, the 2023 beginning net position was decreased by \$17,625 for changes to prepaid insurance, accounts receivable, allowance for uncollectable, accounts payable and payroll taxes payable.

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**REPORT REQUIRED BY *GOVERNMENT AUDITING STANDARDS*
June 30, 2024**



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INDEPENDENT AUDITOR'S 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

July 25, 2024

Board of Directors
Rural Water District No. 3
Pawnee and Payne County
Pawnee, 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, the modified cash basis financial statements of the financial statements of the business-type activities of the Rural Water District No. 3, Pawnee and Payne County, Pawnee, Oklahoma (the District), as of and for the year ended June 30, 2024, and the related notes to the financial statements, which collectively comprise the District's basic financial statements, and have issued our report thereon dated July 25, 2024.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the District's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances 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 District's internal control. Accordingly, we do not express an opinion on the effectiveness of the District'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 a 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 and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. We identified certain deficiencies in internal control, described in the accompanying schedule of findings and responses as items 2024-001 to be material weaknesses.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the District's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. 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*.

District's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the District's response to the findings identified in our audit and described in the accompanying schedule of findings and questioned costs. The District's response was not subjected to the other auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on the response.

Purpose of this Report

The purpose of this report is 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.

CBEW Professional Group, LLP

CBEW Professional Group, LLP
Certified Public Accountants
Cushing, Oklahoma

**RURAL WATER DISTRICT NO. 3
PAWNEE AND PAYNE COUNTY
Pawnee, Oklahoma**

**SCHEDULE OF FINDINGS AND RESPONSES
For the Year Ended June 30, 2024**

2024-001. Internal Control – Segregation of Duties

Criteria: The segregation of duties and responsibilities between different individuals for custody of assets, recordkeeping for those assets and reconciliation of those asset accounts is an important control activity needed to adequately protect the district's assets and ensure accurate financial reporting.

Condition: Presently the same individual that receives utility service-related cash payments is also responsible for service billing and adjustment, also balances the daily cash drawer, posts payments to subsidiary accounts receivable ledger and reconciles the monthly bank statements. In addition, only limited oversight is provided over this individual in the conduct of their daily functions. This finding was also noted in 2023.

Cause: The district's limited size and staffing resources have made it difficult for management to provide sufficient staffing to fully segregate incompatible duties in a cost-effective manner.

Effect or Potential Effect: Without sufficient segregation of duties, the risk significantly increases that errors and fraud related to utility billing and collection activities, including misappropriation of assets, could occur and not be detected within a timely basis.

Recommendation: We recommend that management and the board should consider a formal evaluation of their risks associated with this lack of duties segregation over utility cash and receivables. In response to the identified risks, consideration should be given to identifying and implementing controls that could help mitigate the risks associated with lack of segregation of duties, such as providing increased management oversight and an independent reconciliation of accounts. For example, the entity might consider soliciting the assistance of independent volunteer labor to perform certain functions including performing compensating procedures where applicable.

Responsible Official's Response: The district concurs with the recommendation, although, the cost to correct this condition might exceed the benefit, the district has made certain changes in procedures that will improve the overall lack of segregation of duties and has implemented compensating procedures as appropriate.