Lower Platte South Natural Resources District Lincoln, Nebraska

June 30, 2020

Financial Statements and Independent Auditor's Report



Year ended June 30, 2020

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INDEPENDENT AUDITOR'S REPORT

Board of Directors Lower Platte South Natural Resources District Lincoln, Nebraska

We have audited the accompanying financial statements of the governmental activities and the major fund of Lower Platte South Natural Resources District as of and for the year ended June 30, 2020, and the related notes to the financial statements, which collectively comprise Lower Platte South Natural Resources District's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Lower Platte South Natural Resources District's 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 financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express opinions 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. 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 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 opinions.

Opinions

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities and the major fund of Lower Platte South Natural Resources District as of June 30, 2020, and the respective changes in financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

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Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis and budgetary comparison information be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of the financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise Lower Platte South Natural Resources District's basic financial statements. The supplementary information is presented for purposes of additional analysis and is not a required part of the basic financial statements.

The supplementary information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the supplementary information is fairly stated in all material respects in relation to the basic financial statements as a whole.

The accompanying other information has not been subjected to the auditing procedures applied in the audit of the basic financial statements and, 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 October 13, 2020, on our consideration of Lower Platte South Natural Resources District'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 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 Lower Platte South Natural Resources District's internal control over financial reporting and compliance.

Lincoln, Nebraska October 13, 2020

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Management's Discussion and Analysis

This section of the Lower Platte South Natural Resources District's financial report presents a narrative overview and analysis of the financial activities of the District for the fiscal year ended June 30, 2020.

Overview of Financial Statements

The District's financial statements include government-wide financial statements of the General Fund. The District did not maintain any proprietary funds or fiduciary funds and no component units for the District were identified. Government-wide financial statements are designed to provide readers with a broad overview of the District's finances. These government-wide financial statements include the statement of net position and the statement of activities, which are presented using the accrual basis of accounting. Under the accrual basis of accounting, the current year's revenues and expenses are reported as soon as the underlying event occurs regardless of when cash is received or paid.

The Statement of Net Position presents information on all the District's assets and liabilities, with the difference between the two reported as net position. Over time, increases or decreases in net position may serve as a useful indicator of whether the economic position of the District is improving or deteriorating.

The Statement of Activities presents information showing how the District's net position changed during the most recent fiscal year.

Financial Highlights

Financial highlights for this fiscal year were directly impacted by both the Bomb Cyclone Flood in March of 2019 and the ongoing pandemic of 2020. The Bomb Cyclone Flood resulted in massive flood damages to the region which resulted in Corps of Engineer's staff being re-assigned to flood damage repair projects, reduced the availability of private sector engineering firms to design projects and experienced local contractor availability to construct more projects was limited. There was definitely more work than what could be done. This shortage of both engineers and contractors led to shortages and in most cases a higher cost to do the work. The pandemic has required the District to revise our approach to everything from general operations to project management to public participation.

The Deadmans Run Flood Reduction project was approved in fiscal year 2019 by the US Army Corps of Engineers for approximately \$10M in federal funding. This year the District was approved by the Nebraska Natural Resources Commission for Water Sustainability Funds for \$5.86M of the estimated \$10M in local cost for the Local Project. The District and City of Lincoln will equally benefit (\$2.9M each) from this assistance from the State of Nebraska.

The District offers programs that provide cost-sharing with individual landowners, communities, and home owners associations to complete projects that benefit primarily water quality, stormwater management and flood control. Payments for these programs totaled \$1,062,702. Local interest in contributing toward projects that benefits natural resources remains high.

The District did purchase the adjoining vacant City of Lincoln Fire Station property. Owning this property provides the District additional storage space and potential expansion options, whenever the need arises.

Income from investments totaled over \$150,000 this fiscal year as the interest rates on CD's and savings remained high until the pandemic. Interest income will not be a highlight next fiscal year.

Management's Discussion and Analysis

Financial Highlights - Continued

The District has many projects that are planned in the next several years and adequate funds are currently budgeted to complete many of those projects. Financially the District is in good shape.

	2020	2019
Capital assets	\$ 60,422,180	\$ 59,604,382
Other assets	21,362,235	19,126,074
Total assets	\$81,784,415	\$ 78,730,456
Liabilities	\$ 1,140,979	\$ 1,293,699
Net investment in capital assets	60,422,180	59,604,382
Unrestricted	20,221,256	17,832,375
Total net position	80,643,436	77,436,757
Total liabilities and net position	\$ 81,784,415	\$ 78,730,456

The District's expenditures for fiscal year 2020 did not exceed the budgeted amount, as shown in the following table.

	Actual (Budgetary Basis)	Budget
Receipts		
Federal	\$ 287,681	\$ 3,089,942
State	350,550	904,687
Local	979,346	2,913,581
Property taxes	10,064,674	10,156,870
Other	198,426	
Total receipts	\$ 11,880,677	\$17,065,080
Expenditures		
Administration	\$ 872,065	\$ 1,043,464
Project	4,299,180	8,925,410
Personnel	2,936,062	3,169,247
Other	1,465,589	11,304,165
Total expenditures	\$ 9,572,896	\$ 24,442,286

Budgetary basis revenues exceeded expenditures by \$2,307,781 during the fiscal year ended June 30, 2020.

Management's Discussion and Analysis

Financial Highlights - Continued

Significant differences between budgeted and actual expenditures included:

- The Deadmans Run Flood Reduction Project was delayed primarily due to Corps staff being reassigned to flood damage repairs. Work was subsequently delayed designing the Corp's conveyance channel, flume, and local bridges and basin. Approximately \$1.8M of funds budgeted for this project were not expended this year.
- The Antelope Creek repairs at 39th Street, damages due to the 2015 flood, continue to work thru
 the requirements to meet FEMA standards for funding assistance. A total of \$1.99M of funds
 were budgeted but not expended this year.
- The NRD was notified last year that the Corps approved funding for \$4.7M to repair damage to the Salt Creek Levee system. The NRD had budgeted \$1.15M for this purpose, those funds were not expended as the work is being done completely by the Corps of Engineers.
- The USDA/NRCS Watershed Rehabilitation Program will be funding projects at Oak-Middle 82-B and Upper Salt 3-A. The NRD budgeted matching funds for these projects. Contractor problems and delays have resulted in the projects not progressing as planned. A total of \$1.5M in funding was not expended this fiscal year.
- The Prairie Corridor on Haines Branch Project had several properties where the landowners were considering selling their property for the project. Negotiations were not successful and the properties were not obtained. A total of \$1.4M in funding was not expended this fiscal year.
- Several trail corridor repair projects were budgeted last fiscal year. The Rosa Parks Trail moves
 closer to approval, the Lied Platte River Bridge repairs from the 2019 flood are being repaired
 utilizing other funds, and several trail bridge repairs and bank stabilization projects have been
 slowed in the design and permitting phases. A total of \$534,000 in funding was not expended this
 fiscal year.
- The NRD budgets funds for a number of cost-share programs, working with landowners and encouraging applications. As the year progresses many landowners decide to not apply and other projects approved are not completed due to weather and a variety of other reasons. Approximately \$500,000 in funding was not expended for these programs (cover crops, targeted watersheds, special practices, fertilizer meters, soil sampling, well decommissioning, etc.) and was not expended this fiscal year.
- Funding for a number of operation & maintenance repairs to drainage structures along Antelope Creek and Salt Creek, repairs to the Oak Creek Weir and Antelope Creek articulated block, and bank erosion along Beal Slough all proceeded with design. Construction was not started this fiscal year. A total of \$720,000 in funding was not expended this fiscal year.

Management's Discussion and Analysis

Financial Highlights - Continued

Significant differences between budgeted and actual revenues included:

- Investment income projections were estimated to be \$245,000. The actual revenue was approximately \$158,000. Income was impacted by reduced interest rates due primarily to the pandemic.
- Federal funding was obligated from FEMA for the Antelope Creek repair project near 39th Street.
 Engineering design and permitting continues but construction has not begun. FEMA will reimburse the NRD as work is completed and paid. The NRD did not expend any funds on construction and consequently a reimbursement of \$1.49M has not been received or earned.
- The NRD also is approved for Federal funding for the Oak-Middle 82-B and Upper Salt 3-A Watershed Rehabilitation Projects. Progress with the Oak-Middle 82-B project has been slowed and construction is only approximately 50% completed. The Upper Salt 3-A construction will be starting this fall, no construction payments were made this fiscal year and consequently no reimbursements were received. Landrights reimbursements can be claimed for both projects upon the completion of the projects, neither project is completed. A total of \$902,000 in revenue was budgeted but not received this fiscal year.
- The Deadmans Run Flood Reduction Project anticipated revenues from both the City of Lincoln
 and Water Sustainability Fund. Due to delays in progress with the design of the project lower
 expenditures were realized and less reimbursements were earned. The reduced revenues included
 over \$250,000 from the Water Sustainability Fund and nearly \$350,000 from the City of Lincoln.
- The Prairie Corridor on Haines Branch project with the City of Lincoln anticipated the acquisition of several properties. Negotiations for the properties were not successful and \$1.5M was not spent and consequently it was not reimbursed to the NRD.

The budget was unchanged during the year from the formal adopted budget. Where specific line item expenditures exceeded the budgeted amount, the Board of Directors reviewed and approved such overages.

The District's planning process includes annually reviewing and updating the five-year Long Range Implementation Plan. The first year of the Plan is coincident with the annual financial budget.

Request for Information

Questions concerning any of the information provided in this report or requests for additional financial information should be addressed to Lower Platte South Natural Resources District, P.O. Box 83581, Lincoln, NE 68501-3581.

GOVERNMENTAL FUND BALANCE SHEET/ STATEMENT OF NET POSITION

June 30, 2020

		_	General Fund	Adjustment (Note I)	ts	Statement of Net Position
	ASSETS					
Cash (note B) Investments (note B) Cash at County Treasurer Accounts receivable (notes A and D) Property taxes receivable (note A) Prepaid expenses Capital assets (notes A and E)			825,416 5,295,225 198,761 636,216 4,405,382 1,235	\$		\$ 825,416 15,295,225 198,761 636,216 4,405,382 1,235
Land Other capital assets Accumulated depreciation			<u> </u>	21,727,05 45,843,76 (7,148,63	55	21,727,051 45,843,765 (7,148,636)
Total assets		\$ 2	1,362,235	\$ 60,422,18	30	\$ 81,784,415
	LIABILITIES					
Accounts payable Deposits Compensated absences payable (note A) Accrued salaries and benefits payable Funds held for interlocal agreements (note A)		\$	91,159 1,000 - 1,083 884,323	163,41	-	\$ 91,159 1,000 163,414 1,083 884,323
Total liabilities			977,565	163,41	4	1,140,979
FUND B.	ALANCE/NET	POSI	ITION			
Fund balance (notes A and C) Nonspendable Committed Assigned Unassigned			1,235 6,289,197 7,357,532 6,736,706	(1,23 (6,289,19 (7,357,53 (6,736,70	97) 32)	- - - -
Total fund balance			0,384,670	(20,384,67		-
Total liabilities and fund balance			1,362,235			
Net position (note A) Net investment in capital assets Unrestricted Total net position				60,422,18 20,221,25 60,258,76	56	60,422,180 20,221,256 80,643,436
Total liabilities and net position				\$ 60,422,18		\$ 81,784,415

See accompanying notes to financial statements.

STATEMENT OF GOVERNMENTAL FUND REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE/ STATEMENT OF ACTIVITIES

	Gene Fur			stments ote I)		atement of Activities
Revenues						
State grants and funds	\$ 29	90,966	\$		\$	290,966
Federal grants and funds		0,418			-	490,418
Local grants and reimbursements		5,733				605,733
Property taxes		24,958				10,224,958
Investment earnings		57,083				167,083
Miscellaneous income		290				290
Proceeds from sale of assets	3	31,053		<u> </u>		31,053
Total revenues	11,81	0,501			_	11,810,501
Expenditures/expenses						
Administration	88	34,763				884,763
Projects and improvements		7,427		_		4,107,427
Personnel		4,912		28,929		2,963,841
Depreciation		and a		547,791		647,791
Capital outlay	1,46	55,589		465,589)	_	
Total expenditures/expenses	9,39	2,691	(788,869)	-	8,603,822
Excess (deficit) of revenues over expenditures/expenses	2,41	7,810	(2,4	417,810)		•
Change in net position		_	3,2	206,679		3,206,679
Fund balance/net position						
Beginning of year	17,96	66,860	59,4	169,897	_	77,436,757
End of year	\$ 20,38	84,670	\$ 60,2	258,766	\$	80,643,436

NOTES TO FINANCIAL STATEMENTS

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

This summary of significant accounting policies of Lower Platte South Natural Resources District (the District) is presented to assist in understanding the District's government-wide and governmental fund financial statements. The District's management is responsible for the integrity and objectivity of these financial statements and notes. The following accounting policies have been consistently applied in the preparation of the government-wide and governmental fund financial statements.

Reporting Entity. The District was created on July 1, 1972 by an act of the Nebraska Legislature. The District was organized with its main responsibilities in the area of conservation including: erosion control, flood prevention, soil conservation, water supply, ground and surface water management, pollution control, fish and wildlife habitat, recreation, and forestry and range management. The District serves an area encompassing portions of six Nebraska counties: Butler, Cass, Lancaster, Otoe, Saunders and Seward. Its governmental authority includes the power to levy property taxes and the right of eminent domain.

The District is a local government governed by an elected twenty-one member board. As required by accounting principles generally accepted in the United States of America, these financial statements present only the Lower Platte South Natural Resources District. There are no legally separate organizations for which the elected officials of the District are financially accountable or for which exclusion from these financial statements would cause them to be misleading or incomplete.

Government-wide and Fund Financial Statements. Due to the District's status as a special-purpose government engaged only in governmental activities as described by GASB 34, the fund financial statements and the government-wide financial statements have been combined.

The government-wide financial statements include the statement of net position and the statement of activities, which report financial information for the District as a whole. The statements include governmental activities, which are generally supported by property taxes and grants from other governments.

Governmental fund financial statements use the current financial resources measurement focus and the accrual basis of accounting. Revenues are recognized when they are earned. Expenditures are recorded when the related fund liability is incurred.

Governmental Major Fund. The District reports the following major governmental fund:

General Fund. The General Fund is the primary operating fund of the District. All financial resources of the District are accounted for in the General Fund.

Budgets and Budgetary Accounting. As prescribed by State Statutes, the District adopts an annual budget using the cash basis of accounting. This method of accounting demonstrates compliance with budget laws of the State of Nebraska. All appropriations lapse at year end.

NOTES TO FINANCIAL STATEMENTS

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - CONTINUED

Receivables. The General fund accounts receivable are stated at the amount management expects to collect from balances outstanding at year-end. Management provides for probable uncollectible amounts through a charge to earnings and a credit to a valuation allowance based on its assessment of the current status of individual accounts. Balances that are still outstanding after management has used reasonable collection efforts are written off through a charge to the valuation allowance and a credit to trade accounts receivable. Changes in the valuation allowance have not been material to the financial statements.

Property taxes receivable includes the second half of 2019 taxes due August 1 and September 1, 2020. All delinquent prior years' taxes are determined to be uncollectible and are not included in taxes receivable. The District considers 2019 taxes receivable to be fully collectible.

Capital Assets. Capital assets, which include property, plant, equipment, and infrastructure assets (e.g., roads, bridges, dams, and similar items), are reported in the statement of net assets. Capital assets are defined by the District as assets with an initial individual cost of more than \$5,000 and an estimated useful life in excess of two years. Capital assets are recorded at cost or estimated historical cost if purchased or constructed. Donated capital assets are recorded at their estimated fair value at the date of donation. The cost of normal maintenance and repairs that do not add to the value of the asset or materially extend assets' lives are not capitalized.

Capital assets are carried at cost, less accumulated depreciation. Depreciation is provided for in amounts sufficient to relate the cost of depreciable assets to operations over their estimated useful lives computed on the straight-line method. The estimated lives by asset class follow:

Vehicles	5 years
Office equipment	5-7 years
Machinery and other equipment	5-7 years
Buildings	15-40 years
Infrastructure	50-99 years

Property Tax Calendar. Property tax levies are set by the local governing board and filed with the County Clerk on or before September 20. Real and personal property taxes are due and become an enforceable lien on property on December 31. The first half of real estate and personal property taxes become delinquent on either April 1 or May 1 and the second half become delinquent on either August 1 or September 1 following the levy date.

Compensated Absences. It is the District's policy to permit employees to accumulate earned but unused vacation and comp time benefits. Employees who terminate with accumulated vacation leave will be paid for any unused time at their current hourly rate of pay.

Deferred Revenue. Deferred revenue represents advances of grant funds received prior to the incurrence of related costs by the District.

Funds Held for Interlocal Agreements. The District has several interlocal agreements in place for cost-shared projects. Some partners paid their share of estimated costs in advance of expenses being incurred.

NOTES TO FINANCIAL STATEMENTS

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - CONTINUED

Equity. In the government-wide financial statements, equity is classified as net position and displayed in three components:

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.

Restricted. Consists of net assets with constraints placed on the use either by 1) external groups such as creditors, grantors, contributors, or laws and regulations of other governments; or 2) law through constitutional provisions or enabling legislation.

Unrestricted. Consists of all other assets that do not meet the definition of "invested in capital assets, net of related debt" or "restricted."

In the governmental fund financial statements, equity is classified as fund balance. Beginning with fiscal year 2011, the District implemented GASB Statement 54 "Fund Balance Reporting and Governmental Fund Type Definitions". This Statement provides more clearly defined fund balance categories to make the nature and extent of the constraints placed on a government's fund balance more transparent. The following classifications describe the relative strength of the spending constraints placed on the purposes for which resources can be used.

Nonspendable. Amounts that are not in a spendable form or are required to be maintained intact.

Restricted. Amounts constrained to specific purposes by their providers (such as grantors, bondholders and higher levels of government), through constitutional provisions, or by enabling legislation. The District does not currently have any restricted fund balances.

Committed. Amounts constrained to specific purposes by the District itself, using its highest level of decision-making authority, to be reported as committed, amounts cannot be used for any other purpose unless the District takes the same highest level action to remove or change the constraint.

Assigned. Amounts the District intends to use for a specific purpose; intent can be expressed by the governing body or by an official or body to which the governing body delegates the authority.

Unassigned. Amounts that are available for any purpose.

The Board establishes (and modifies or rescinds) fund balance commitments by passage of an ordinance or resolution. This is typically done through adoption and amendment of the budget. A fund balance commitment is further indicated in the budget document as a designation or commitment of the District. Assigned fund balance is established by the Board through adoption or amendment of the budget or by Management as intended for specific purpose (such as the purchase of fund assets or construction or for other purposes).

When fund balance resources are available for a specific purpose in more than one classification, it is the District's policy to use the most restrictive funds first in the following order: restricted, committed, assigned and unassigned as they are needed.

Use of Estimates. The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect certain reported amounts and disclosures (such as estimated useful lives in determining depreciation expense); accordingly, actual results could differ from those estimates.

NOTES TO FINANCIAL STATEMENTS

NOTE B - CASH AND INVESTMENTS

State Statutes authorize the District to invest in certificates of deposit and time deposits in any state or national bank in the State of Nebraska. Additionally, State Statutes require banks either to give bond or to pledge government securities (types of which are specifically identified in the Statutes) to the extent that deposits exceed the amount insured by the Federal Deposit Insurance Corporation (FDIC). At June 30, 2020, all of the District's deposits were insured or collateralized.

NOTE C - COMMITTED, ASSIGNED, AND NONSPENDABLE FUND BALANCES

Committed fund balance consists of the following constraints on use of the District's fund balance imposed by the Board of Directors. Assigned fund balance consists of the following constraints on the use of the District's fund balance imposed by Management.

the state of the s	June 30, 2020				
	REMAINING	REMAINING			
PROJECT	TOTAL COST	REIMBURSEMENT	NET NRD COST	COMMITTED	ASSIGNEI
&E Programs and Projects	\$ 31,000	\$ -	\$ 31,000	\$ -	\$ 31,000
&E Env. Education	194,200		194,200	38,000	156,20
&E General Awareness	242,300		242,300	55,307	186,99
Surface Water Quality Practices	1,100,000	56,000	1,044,000	159,111	884,88
Special Practices	100,000		100,000	93,812	6,18
Buffer Strips	36,750	32,000	4,750	4,750	-,
Salt Valley Lakes	300,000		300,000	40,000	260,00
Stevens Creek Watershed	75,000		75,000	10,000	75,00
Cover Crop	75,000		75,000		75,00
Water Quality BMP Projects	100,000	60,000	40,000		40,00
GIS Support	10,000	00,000	10,000		10,00
GIS Aerial Imagery Project	23,000		23,000	18,000	5,00
GIS Mapping ROW	10,000		10,000	18,000	10,00
LPRCA Coordinator	5,010		5,010	5,010	10,00
LPRCA Programs and Projects		152 042	5,010	3,010	
	153,243	153,243	22 000	22 000	
DC Consultant Services	23,000		23,000	23,000	
Platte River Ice Jam Agreement	22,500		22,500	22,500	
nvasive Species Program	30,000		30,000	30,000	
Endangered Species Studies	5,000	•	5,000		5,00
Monitor Lower Platte River Instream Flow	10,000	•	10,000		10,00
Conservation Easement NET	50,000	•	50,000		50,00
Western Sarpy / Clear Creek Project	50,000	•	50,000	•	50,00
Trails Administration	3,000	3,000			
Mopac East O&M	518,500	1,500	517,000	482	516,51
Salt Creek Trail Planning and Development	269,800	-	269,800	120,200	149,60
Oak Creek Trail O&M	66,500	•	66,500	-	66,50
Oak Creek Trail Planning & Development	289,200		289,200	20,420	268,78
Homestead Trail O&M	428,700		428,700	9,750	418,95
Wildlife Management Areas O&M	51,000		51,000	10,000	41,00
Diversify Grassland	25,000		25,000		25,00
Conservation Easements	200,000		200,000		200,00
PCHB O&M / Project Coordination	625,290	527,400	97,890	97,890	
Haines Branch Corridor	100,000	100,000			
Saline Wetlands Partnership Support	380,000	332,000	48,000	48,000	
Wetland O&M	135,000	7,000	128,000	10,000	118,00
Wetland 404 Monitoring	6,000	7,000	6,000	6,000	110,00
Saline Wetlands Conservation Easements	150,000		150,000	0,000	150,00
	61,000	5,000	56,000	10,596	45,40
Upper Little Salt Cr Saline Wetland		3,000			43,40
UNL/NRD Forester	30,500	40.050	30,500	30,500	10.00
Rural Forestry Program	54,450	42,250	12,200	•	12,20
Windbreak Renovation Program	45,000	15,000	30,000		30,00
Tree Voucher Program	25,000		25,000	2012	25,00
Community Forestry Program	30,000		30,000	2,810	27,19
Sales Tax	5,128	5,128	• • • • • • • • • • • • • • • • • • • •	-	
Beal Slough	629,270	330,732	298,538	298,538	
Little Salt Creek	160,000	80,000	80,000	80,000	
BMP Demos/C-S	15,000		15,000	15,000	
Urban Water Quality Cost-Shares	20,000		20,000	-	20,00
Basin Master Plan	215,438	-	215,438	215,438	

NOTES TO FINANCIAL STATEMENTS

NOTE C - COMMITTED, ASSIGNED, AND NONSPENDABLE FUND BALANCES - CONTINUED

	June 30, 2020				
	REMAINING	REMAINING			
PROJECT	TOTAL COST	REIMBURSEMENT	NET NRD COST	COMMITTED	ASSIGNEI
Salt Cr Flood Warning	\$ 70,000	\$ 25,000	\$ 45,000	\$ 25,000	\$ 20.00
Lincoln Storm Water Management Programs	12,500		12,500	12,500	\$ 20,000
E&SC Administration Cost-Share	31,500		30,750	30,750	
Conservation Easement Inspections	25,000		25,000	30,730	25.00
DMR, Flood Reduction Recon. Study	2,664,037		1,053,376	1,053,376	25,000
South Salt Creek Master Plan	451,860		442,930		
Oak Cr. Lynn Cr. N Salt Cr. Tribs Master Plan	75,000		75,000	442,930	
Non-Basin Master Plan Projects	70,000		70,000	75,000	
Iazard Mitigation Plan Update	6,150			70,000	
Beal Slough, Channel Improvements	20,000		147	•	14
Salt Creek O&M	462,500		20,000	-	20,000
Salt Creek SWIF	64,900		462,500	67,400	395,100
OMR O&M	422,000		64,900	64,900	
Ant Cr O&M			422,000	44,558	377,442
Antelope Valley Routine O&M	373,000		373,000	4,175	368,825
tevens Creek	180,000		180,000	10,000	170,000
Oak Cr O&M	10,000		10,000	-	10,000
Beal Slough, O&M	29,000	-	29,000	9,000	20,000
Lynn Creek, O&M	85,000	•	85,000	•	85,000
Ash Hollow O&M	10,000	-	10,000		10,000
	309,000		309,000	300,000	9,000
O&M Equip & Supplies	40,000	•	40,000	-	40,000
ant Cr Major O&M	1,980,000	1,485,000	495,000	495,000	
Oak Creek Major O&M	365,640		365,640	25,640	340,000
Salt Creek Major O&M/Rehabilitation	752,380	•	752,380	732,380	20,000
lood Plain Purchase/Easements	25,000		25,000	-	25,000
Community Assistance, General Projects	384,563	- The second second	384,563	184,563	200,000
load Structure O&M	40,000	•	40,000		40,000
iening FC Dam	48,000		48,000		48,000
C Dams O&M	15,000		15,000		15,000
Vatershed Dams O&M	153,500		153,500		153,500
Vatershed Rehab	2,399,973	1,649,277	750,696	750,696	100,000
Clearing and Snagging	5,000		5,000	,,,,,,,	5,000
Stream Stabilization above clean lakes	10,000		10,000		10,000
ower Salt Cr Stream Stability	20,000		20,000		20,000
tream Stability Demos with agencies	30,000		30,000		30,000
tream Degradation control projects/landowners	50,000		50,000		50,000
JSGS Stream Gages Co-op	70,000		70,000	70,000	50,000
urface Water Quality Monitoring	5,000		5,000	70,000	5,000
ower Salt Cr Phase II	48,000		48,000		48,000
hase I and II CWSPAs	359,600		359,600	244,425	115,175
Ionitoring Q & Q Program	243,000	21,000	222,000	47,331	
W BMP Programs	83,122	4,150	78,972	8,734	174,669
eophysical Mapping Project	46,000	4,130	46,000		70,238
Ionitoring well installation	130,000			6,000	40,000
NWRA Projects	126,661	126,661	130,000		130,000
NWRA AEM Flights	600,000	365,000	225,000		225 000
NWRA Coordinator	66,705		235,000		235,000
MP - Water Inventory		66,705	77.740	20.525	20.00
MP - Water Supply Management	214,725	136,976	77,749	39,725	38,024
	5,000		5,000	•	5,000
MP - Water Use Management ower Platte Basi Coalition	20,000	•	20,000		20,000
ower ridue basi Coantion	10,000	-	10,000	10,000	-

Lower Platte South Natural Resources District NOTES TO FINANCIAL STATEMENTS

NOTE C - COMMITTED, ASSIGNED, AND NONSPENDABLE FUND BALANCES - CONTINUED

Nonspendable fund balance includes the following balance that is not in a spendable form:

Prepaid expenses \$ 1,235

NOTE D - ACCOUNTS RECEIVABLE

Accounts receivable consists of the following:

Federal grants and cost share agreements Intergovernmental reimbursements State grants	\$ 410,764 199,054
	\$ 636.216

NOTE E - CAPITAL ASSETS

	2019	Additions During Year	Disposals During Year	2020
Capital assets, not depreciated				
Land	\$21,619,221	\$ 107,830	\$ -	\$21,727,051
Capital assets, depreciated			A STATE OF THE STA	
Infrastructure	40,335,437	827,521		41,162,958
Buildings	2,669,108	275,801		2,944,909
Construction in progress	241,997	153,255	_	395,252
Office equipment	275,223	5,848	_	281,071
Machinery and equipment	515,760	26,200	12,769	529,191
Vehicles	514,633	69,187	53,436	530,384
Total capital assets, depreciated	44,552,158	1,357,812	66,205	45,843,765
Less accumulated depreciation for:				
Infrastructure	4,422,917	473,863		4,896,780
Buildings	1,156,899	69,501		1,226,400
Office equipment	239,536	15,251		254,787
Machinery and equipment	377,444	36,087	12,716	400,815
Vehicles	370,201	53,089	53,436	369,854
Total accumulated depreciation	6,566,997	647,791	66,152	7,148,636
Total capital assets,				
depreciated, net	37,985,161	710,021	53	38,695,129
Total capital assets, net	\$ 59,604,382	\$ 817,851	\$ 53	\$ 60,422,180

NOTES TO FINANCIAL STATEMENTS

NOTE F - DEFINED CONTRIBUTION PENSION PLAN

The District employees participate in the Nebraska Association of Resource Districts Employees Governmental Retirement Plan (the Plan), a multiple-employer public employee retirement plan (PERS). On January 1, 1998, the Plan was converted from a defined benefit to a defined contribution pension plan under IRS Code Section 414(h). All District employees who are working at least 1,000 hours in a year, have 6 months of service, and have reached the age of 19 are eligible to participate in the Plan.

Plan members are required to contribute 5.5% of their covered salary. The District is required to contribute 6% of covered salary to the plan. The contribution requirement for the year ended June 30, 2020 was \$226,054, which consisted of \$117,941 from the District and \$108,113 from employees.

NOTE G - DEFERRED COMPENSATION PLAN

On July 1, 1994, the District began offering its employees a deferred compensation plan created in accordance with Internal Revenue Code Section 457. The plan, available to all District employees, permits them to defer a portion of their salary until future years.

NOTE H - OPERATING LEASES

On May 5, 2017, the District entered into a 60-month lease for office equipment. Under the terms of the lease, monthly rent payments are \$619.

On August 10, 2017 the District entered into a 63-month lease for office equipment. Under the terms of the lease, monthly rent payments are \$197.

The financial statements included rent expenses of \$35,843 for the year ended June 30, 2020.

Minimum lease payments for the years following June 30, 2020 are as follows:

Fiscal Year	
2021	\$ 9,791
2022	9,172
2023	 985
	\$ 19,948

NOTES TO FINANCIAL STATEMENTS

NOTE I - RECONCILIATION OF GOVERNMENT-WIDE AND FUND FINANCIAL STATEMENTS

Reconciliation between governmental fund balance and the net position of governmental activities:

The total fund balance of the District's governmental fund differs from the total net position of governmental activities reported in the statement of net position. The difference results from the long-term economic focus of the statement of net position versus the current financial resources focus of the governmental fund balance sheet.

Fund balance of governmental fund	\$ 20,384,670
Accrued compensated absences represent amounts not due and payable in the current period and therefore, are not reported in the fund.	(163,414)
Capital assets used in governmental activities are not financial resources and therefore, are not reported in the fund.	60,422,180
Net position of the governmental activities	\$ 80,643,436

Reconciliation between excess of revenues over expenditures and change in net position of statement of activities:

The excess of revenues over expenditures differs from the change in net position for governmental activities. The differences arise from the long-term economic focus of the statement of activities versus the current financial resources focus of the governmental fund.

Excess of revenues over expenditures	\$ 2,417,810
Governmental fund reports capital outlays as expenditures while governmental activities report deprecation expense to allocate those expenditures over the life of the assets:	
Capital outlay	1,465,589
Depreciation expense	(647,791)
Compensated absences reported in the statement of activities do not require the use of current financial resources and, therefore are not	
reported as a governmental expenditure.	(28,929)
Change in net position	\$ 3,206,679

NOTE J - RISKS AND UNCERTAINTIES

The COVID-19 (coronavirus) outbreak continues to prompt global health concerns. Consequently, it is possible the District could be impacted by the resulting volatility in the economy beyond the financial statement date. Specifically, the District could experience decreases in grant funding, delays in project approval and completion, and declines in investment markets.

NOTE K - SUBSEQUENT EVENTS

Subsequent events have been evaluated through the audit report date, the date the financial statements were available to be issued.

REQUIRED SUPPLEMENTARY INFORMATION

SCHEDULE OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE - BUDGET AND ACTUAL - GENERAL FUND

For the year ended June 30, 2020

	Original and Final Budget	Actual (Budgetary Basis)	Variance Favorable (Unfavorable)	Budget to GAAP Differences (Over) Under	Actual Amounts GAAP Basis
Revenues					
State grants and funds	\$ 904,687	\$ 350,550	\$ (554,137)	\$ (59,584)	\$ 200.066
Federal grants and funds	3,089,942	287,681	(2,802,261)	202,737	
Local grants and reimbursements	2,913,581	979,346	(1,934,235)		490,418
Property taxes	10,156,870	10,064,674	(92,196)	(373,613)	605,733
Investment earnings	10,120,070	167,083	167,083	160,284	10,224,958
Miscellaneous income		290	290		167,083
Proceeds from sale of assets		31,053		•	290
		31,033	31,053		31,053
Total revenues	17,065,080	11,880,677	(5,184,403)	(70,176)	11,810,501
Expenditures					
Administration	1,043,464	872,065	171 200	10 (00	004.50
Projects and improvements	8,925,410	4,299,180	171,399	12,698	884,763
Personnel	3,169,247		4,626,230	(191,753)	4,107,427
Depreciation	3,109,247	2,936,062	233,185	27,779	2,963,841
Capital outlay	11,304,165	1 465 500	0.000.554	647,791	647,791
Capital outlay	11,304,103	1,465,589	9,838,576	(1,465,589)	<u> </u>
Total expenditures	24,442,286	9,572,896	14,869,390	(969,074)	8,603,822
EXCESS (DEFICIENCY) OF REVENUES OVER (UNDER) EXPENDITURES	\$ (7,377,206)	\$ 2,307,781	\$ 9,684,987	\$ 898,898	\$ 3,206,679

The District prepares its budget on the cash basis rather than the accrual basis resulting in the following differences:

Depreciation expense	\$	(647,791)
Capital asset cash purchases	4	1,465,589
Increase (decrease) in assets		1,105,507
Accounts receivable		(230,458)
Prepaid expenses		(1,444)
Property taxes receivable		160,284
(Increase) decrease in liabilities		100,201
Accounts payable		116,408
Deposits		(500)
Compensated absences payable		(28,930)
Accrued salaries and benefits payable		1,250
Deferred revenue		53,213
Funds held for interlocal agreements		11,277
Excess of revenues over expenditures - budget to GAAP	\$	898,898

SUPPLEMENTARY INFORMATION

SCHEDULE OF ADMINISTRATIVE EXPENDITURES BUDGET AND ACTUAL - GENERAL FUND

		Budget	(E	Actual Budgetary Basis)	_(Variance Favorable Unfavorable)	E	Budget to GAAP Differences (Over) Under		ctual Amounts GAAP Basis
Auto and truck expense	\$	60,000	\$	46,858	\$	13,142	\$	2,009	\$	48,867
Directors expense		46,000		29,126		16,874		(2,693)		26,433
Directors per diem		59,000		47,166		11,834				47,166
Dues and memberships		49,787		48,215		1,572				48,215
Personnel expenses		53,000		25,700		27,300		(1,785)		23,915
Fees and licenses		115,000		93,187		21,813		15,552		108,739
Bonding expense		1,340		70		1,270		-		70
Insurance		99,700		96,602		3,098		65		96,667
Legal notices		6,000		3,455		2,545				3,455
Office supplies and expense		186,578		150,534		36,044		(1,947)		148,587
Postage		2,500		2,744		(244)				2,744
Professional services		189,700		200,949		(11,249)		771		201,720
Rent expense		14,400		14,400						14,400
Telephone		47,000		41,462		5,538		167		41,629
Utilities		22,000		17,345		4,655		569		17,914
Miscellaneous		10,759		4,183		6,576		-		4,183
Small equipment		18,700		-		18,700				-
Building maintenance	<u> </u>	62,000	_	50,069	_	11,931	_	(10)	_	50,059
	\$	1,043,464	\$	872,065	\$	171,399	\$	12,698	\$	884,763

SCHEDULE OF PROJECT AND IMPROVEMENT COSTS AND CAPITAL OUTLAY BUDGET AND ACTUAL - GENERAL FUND

	Budget	Actual (Budgetary Basis)	Variance Favorable (Unfavorable)	Budget to GAAP Differences (Over) Under	Actual Amounts GAAP Basis	
Fees and licenses	\$ 2,530,297	\$ 1,323,234	\$ 1,207,063	\$ (71,303)	\$ 1,251,931	
Information and education	461,900	310,831	151,069	3,082	313,913	
Professional services	39,400	-	39,400	-	515,715	
Project operation and maintenance	2,388,956	756,428	1,632,528	(5,168)	751,260	
Development of district holdings	76,000	42,432	33,568	199	42,631	
Sales tax	5,125	2,403	2,722		2,403	
Wildlife habitat	150,750	42,588	108,162	173	42,761	
Land and water treatment	1,652,450	900,625	751,825	6,687	907,312	
Intergovernmental cost sharing	1,620,532	794,553	825,979	663	795,216	
Land	-	107,830	(107,830)		-	
Buildings	300,000	275,801	24,199	(275,801)		
Construction in progress		153,255	(153,255)			
Automobiles and trucks		69,187	(69,187)			
Infrastructure	11,304,165	953,554	10,350,611	(953,554)		
Machinery	-	26,200	(26,200)	(26,200)		
Office equipment	-	5,848	(5,848)	(5,848)		
	\$20,529,575	\$ 5,764,769	\$ 14,764,806	\$ (1,657,342)	\$ 4,107,427	

SCHEDULE OF PERSONNEL COSTS BUDGET AND ACTUAL - GENERAL FUND

	_	Budget	(I	Actual Budgetary Basis)	_(Variance Favorable (Unfavorable)	- F	Budget to GAAP Differences (Over) Under		Actual Amounts GAAP Basis
Employee benefits	\$	606,405	\$	517,984	\$	88,421	\$	(83)	\$	517,901
Payroll taxes		180,000		155,885		24,115		(00)	Ψ	155,885
Salaries, administrative		389,785		381,727		8,058		3,416		385,143
Salaries, clerical		226,201		215,142		11,059		(8,288)		206,854
Salaries, maintenance and construction		180,000		170,520		9,480		183		170,703
Salaries, technical	_	1,586,856		1,494,804	_	92,052	_	32,551	_	1,527,355
	\$	3,169,247	\$	2,936,062	\$	233,185	\$	27,779	\$	2,963,841



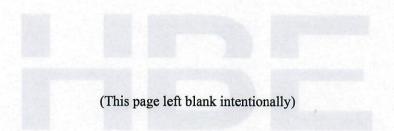
SCHEDULE OF INFORMATION REQUIRED BY NEBRASKA STATUTES - BUDGETARY BASIS

For the year ended June 30, 2020

Gross income from all sources	\$11,880,677
Amount expended for maintenance, improvements and other such programs	\$ 5,814,838
Amount of depreciation on property	\$ 647,791
Number of employees as of June 30	31
Salaries paid to employees	\$ 2,262,193

Bidding practices of the District

The District lets bids as prescribed by State Statutes and in instances where a project co-sponsor requires bids. Invitations for bids are published and circulated to interested prospective bidders. Sealed bids are publicly opened at a specified date, time and place. The Board of Directors awards the contract after considering price and other factors.





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

Board of Directors Lower Platte South Natural Resources District Lincoln, Nebraska

We have audited, 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, the financial statements of the governmental activities and the General Fund of Lower Platte South Natural Resources District as of and for the year ended June 30, 2020, and the related notes to the financial statements, which collectively comprise Lower Platte South Natural Resources District's basic financial statements and have issued our report thereon dated October 13, 2020.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered Lower Platte South Natural Resources District'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 opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Lower Platte South Natural Resources District's internal control. Accordingly, we do not express an opinion on the effectiveness of Lower Platte South Natural Resources District'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 that might be material weaknesses or significant deficiencies, and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as described in the accompanying schedule of findings and questioned costs, we identified certain deficiencies in internal control that we consider to be material weaknesses and a significant deficiency.

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 District's financial statements will not be prevented, or detected and corrected on a timely basis. We consider the deficiency described in the accompanying schedule of control deficiencies as item 2020-001 to be a material weakness.

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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.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Lower Platte South Natural Resources 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 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*.

Lower Platte South Natural Resources District's Response to Findings

Lower Platte South Natural Resources District's response to the findings identified in our audit is described in the accompanying corrective action plan. Lower Platte South Natural Resources District'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

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.

Lincoln, Nebraska October 13, 2020

SHBE LLP

SCHEDULE OF CONTROL DEFICIENCIES

Year ended June 30, 2020

Findings - Financial Statements Audit

The audit disclosed one material weakness in Lower Platte South Natural Resources District's internal control over financial reporting summarized as follows:

2020-001 - Criteria: Communication, in writing, to management and those charged with governance, of significant deficiencies and material weaknesses identified in an audit is required.

Condition: The District does not have an internal control system designed to provide for the preparation of the financial statements being audited.

Context: We reviewed the District's organizational chart and performed interviews of personnel and management to determine if management has the ability to prepare the financial statements in accordance with the modified cash basis of accounting.

Cause: The District's accounting personnel do not have the expertise to prepare financial statements, including note disclosures, in accordance with U.S. generally accepted accounting principles. This is not an unusual deficiency for an entity of this size.

Effect or potential effect: The material weakness results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the District's internal control.

Recommendation: Lower Platte South Natural Resources District's management and Board of Directors should rely on its review and oversight authority to mitigate this inherent weakness in its internal control system.

Identification of repeat finding: This is a repeat fining from the immediate previous audit, 2019-2.

Views of Responsible Officials and Planned Corrective Actions: The District's Board of Directors continually evaluates the distribution of duties to employees and monitors accounting functions.



SCHEDULE OF RESPONSES

Year ended June 30, 2020

The corrective action plan for the findings included in the schedule of findings and questioned costs is summarized as follows:

Finding 2020-001 Internal Control over Preparation of the Financial Statements

Corrective Action Planned: Lower Platte South Natural Resources District's management and Board of Directors will rely on its review and oversight authority to mitigate this inherent weakness in its internal control system.

Anticipated Completion Date: Continuous.

Responsible: Management and Board of Directors.

Paul Zillig, General Manager

SUMMARY SCHEDULE OF PRIOR YEAR FINDINGS

Year ended June 30, 2020

Findings - Financial Statements Audit

The audit disclosed one significant deficiency in Lower Platte South Natural Resources District's internal control over financial reporting summarized as follows:

2019-1 Condition: Lower Platte South Natural Resources District does not have appropriate segregation of duties. Presently, the same individual has access, record-keeping, and reconciliation responsibilities.

Corrective action planned: Lower Platte South Natural Resources District's management and Board of Directors will rely on its review and oversight authority to mitigate this inherent weakness in its internal control system.

Status: Corrected.

The audit disclosed one material weakness in Lower Platte South Natural Resources District's internal control over financial reporting summarized as follows:

2019-2 Condition: The District does not have an internal control system designed to provide for the preparation of the financial statements being audited.

Corrective action planned: Lower Platte South Natural Resources District's management and Board of Directors will rely on its review and oversight authority to mitigate this inherent weakness in its internal control system.

Status: Not corrected.

Due to the limited size and staffing resources of the entity, the District does not have the ability or expertise to prepare financial statements, including note disclosures, in accordance with U.S. generally accepted accounting principles. Management and the Board of Directors will continue to exercise oversight authority to mitigate this weakness in its internal control system.