



**BURGER · COMER · MAGLIARI**  
CERTIFIED PUBLIC ACCOUNTANTS

April 19, 2017

To The Board of Commissioners  
Guam Housing and Urban Renewal Authority

We have performed an audited the financial statements of Guam Housing and Urban Renewal Authority (the Authority) as of and for the year ended September 30, 2016 in accordance with auditing standards generally accepted in the United States of America (“generally accepted auditing standards”) and have issued my report thereon dated April 19, 2017.

We have prepared the following comments to assist you in fulfilling your obligation to oversee the financial reporting and disclosure process for which management of the Authority is responsible.

**Our Responsibility under Generally Accepted Auditing Standards and Generally Accepted Government Auditing Standards**

Our responsibility under auditing standards generally accepted in the United States of America and standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, have been described in our engagement letter dated October 28, 2016. As described in that letter, the objective of a financial statement audit conducted in accordance with the aforementioned standards is:

- To express an opinion on the fairness of the Authority’s financial statements and the accompanying supplementary information, in relation to the financial statements as a whole, for the year ended September 30, 2016 (the financial statements), in accordance with accounting principles generally accepted in the United States of America (“generally accepted accounting principles”), in all material respects, and to perform specified procedures on the required supplementary information for the year ended September 30, 2016;
- To express an opinion on whether the supplementary information that accompanies the financial statements, including the schedule of expenditures of federal awards, is fairly stated, in all material respects, in relation to the financial statements taken as a whole;
- To report on the Authority’s internal control over financial reporting and on its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters for the year ended September 30, 2016 based on an audit of financial statements performed in accordance with the standards applicable to financial audits contained in *Government Auditing Standards*; and
- To report on the Authority’s compliance with requirements applicable to each major federal program and on internal control over compliance in accordance with the *U.S. Office of Management and Budget (OMB) Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)*.

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**Our Responsibility under Generally Accepted Auditing Standards and Generally Accepted Government Auditing Standards, continued**

Our responsibilities under generally accepted auditing standards include forming and expressing an opinion about whether the financial statements have been prepared by management with the oversight of the Board of Commissioners are fairly presented, in all material respects, in conformity with generally accepted accounting principles. The audit of financial statements does not relieve management or the Board of Commissioners of their responsibilities.

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 on the effectiveness of the Authority's internal control over financial reporting. Our consideration of internal control over financial reporting was not designed to identify all deficiencies in internal control over financial reporting that might be significant deficiencies or material weaknesses.

We also considered the Authority's internal control over compliance with requirements that could have a direct and material effect on a major federal program in order to determine our auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with the Uniform Guidance. Our audit does not, however, provide a legal determination of the Authority's compliance with those requirements.

**Qualitative Aspects of the Authority's Significant Accounting Practices**

We discussed our judgements about the quality, not just the acceptability, of the Authority's accounting principles as applied in its financial reporting, including consistency of the accounting principles and their application and the clarity and completeness of the financial statements and related note disclosures.

**Significant Accounting Policies**

Management of the Authority has the responsibility for selection and use of appropriate accounting policies. The significant accounting policies used by the Authority are described in Note 1 to the financial statements.

In February 2015, GASB issued Statement No. 72, *Fair Value Measurement and Application* which addresses accounting and financial reporting issues related to fair value measurements and guidance for determining a fair value measurement for financial reporting purposes. This Statement also provides guidance for applying fair value to certain investments and disclosures related to all fair value measurements. This Statement requires a government to use valuation techniques that are appropriate under the circumstances and for which sufficient data are available to measure fair value.

### **Significant Accounting Policies, continued**

This Statement establishes a hierarchy of inputs to valuation techniques used to measure fair value. This Statement requires additional analysis of fair value if the volume or level of activity for an asset or liability has significantly decreased. It also requires identification of transactions that are not orderly. This Statement requires measurement at acquisition value (an entry price) for donated capital assets, donated works of art, historical treasures, and similar assets and capital assets received in a service concession arrangement. This Statement requires disclosures to be made about fair value measurements, the level of fair value hierarchy, and valuation techniques. It also requires additional disclosures regarding investments in certain entities that calculate net asset value per share (or its equivalent). The requirements of this Statement are effective for financial statements for periods beginning after June 15, 2015. Earlier application is encouraged. Management has not yet determined the effect of implementation of this Statement will have on the Authority's financial statements.

In June 2015, GASB issued Statement No. 73, *Accounting and Financial Reporting for Pensions and Net Related Assets That Are Not within the Scope of GASB Statement 68, and Amendments to Certain Provisions of GASB Statements 67 and 68*. This Statement establishes accounting and financial reporting standards for pensions that do not meet the requirements set forth in Statement No. 67, *Financial Reporting for Pension Plans* and Statement No. 68, *Accounting and Financial Reporting for Pensions*, and makes some modifications to GASB Statement No. 67 and 68. The Provisions that effect pensions not within the scope of GASB Statement No. 67 and 68 will be effective for fiscal year beginning after June 15, 2015.

Management has not yet determined the effect of implementation this Statement will have on the Authority's financial statements. In June 2015, GASB issued Statement No. 74, *Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans*, which replaces Statement No. 43, *Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans*, as amended, and No., 57, *OPEB Measurements by Agent Employers and Agent-Multiple-Employer Plans*, and addresses financial reporting requirements for governments whose employees are provided with postemployment benefits other than pensions (other postemployment benefits or OPEB). The provisions in Statement No. 74 are effective for fiscal years beginning after June 15, 2016. Management has not yet determined the effect of implementation of this Statement will have on Authority's financial statements.

In June 2015, GASB issued Statement No. 75, *Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions*, which replaces the requirements of Statements No. 45, *Accounting and Financial Reporting by Employers for Postemployment Benefits Other Than Pensions*, as amended, and No. 57, *OPEB Measurements by Agent Employers and Agent Multiple-Employer Plans*, and provides guidance on reporting by governments that provide OPEB to their employees and for governments that finance OPEB for employees of other governments. The provisions in Statement No. 785 are effective for fiscal years beginning after June 15, 2017. Management has not yet determined the effect of implementation of this Statement will have on Authority's financial statements.

**Significant Accounting Policies, continued**

In June 2015, GASB issued Statement No. 76, *The Hierarchy of Generally Accepted Accounting Principles for State and Local Government*, which eliminates two of the four categories of authoritative GAAP that exist under the existing hierarchy prescribed by Statement No. 55. The hierarchy becomes (1) GASB Statements and (2) GASB technical bulletins and implementation guides in addition to AICPA guidance that the GASB clears. The provisions of Statement No. 76 are effective for fiscal years beginning after June 15, 2015. Management does not believe that the implementation of this Statement will have a material effect on the Authority's financial statements.

In August 2015, GASB issued Statement No. 77, *Tax Abatement Disclosures*, which requires governments that enter into tax abatement agreements to disclose certain information about the agreements. The provisions in Statement No. 77 are effective for fiscal years beginning after December 15, 2015. Management has not yet determined the effect of implementation of this Statement will have on Authority's financial statements.

In December 2015, GASB issued Statement No. 78, *Pensions Provided Through Certain Multiple-Employer Defined Benefit Pension Plans*. The objective of this Statement is to address a practice issue regarding the scope and applicability of Statement No. 68, *Accounting and Financial Reporting for Pensions*. This issue is associated with pensions provided through certain multiple-employer defined benefit pension plans and to state or local government employers whose employees are provided with such pensions. GASB Statement No. 78 will be effective for fiscal years beginning after December 15, 2015.

Management has not yet determined the effect of implementation of this Statement will have on Authority's financial statements.

In December 2015, GASB issued Statement No. 79, *Certain External Investment Pools and Pool Participants*. This Statement addresses accounting and financial reporting for certain external investment pools and pool participants. GASB Statement No. 79 will be effective for fiscal years beginning after December 15, 2015. Management has not yet determined the effect of implementation of this Statement will have on Authority's financial statements.

In January 2016, GASB issued Statement No. 80, *Blending Requirements for Certain Component Units*. The Statement is intended to provide clarity about how certain component units incorporated as not-for-profit corporations, with the primary state or local government being the sole corporate member, should be presented in the financial statements of the primary state or local government. GASB Statement No. 80 will be effective for fiscal years beginning after June 15, 2016. Management has not yet determined the effect of implementation of this Statement will have on Authority's financial statements.

### **Significant Accounting Policies, continued**

In March 2016, GASB issued Statement No. 81, *Irrevocable Split-interest Agreements*. This Statement is intended to provide recognition and measurement guidance for situations in which a government is a beneficiary of the agreement. GASB Statement No. 81 is effective for fiscal years beginning after December 15, 2016. Management has not yet determined the effect of implementation of this Statement will have on Authority's financial statements.

In March 2016, GASB issued Statement No. 82, *Pension Issues – An Amendment of GASB Statements No. 67, No. 68 and No. 73*. This Statement addresses the presentation of payroll – related measures in required supplementary information, the selection of assumptions and the treatment of deviations from the guidance in an Actuarial Standard of Practice for financial reporting purposes, and the classification of payments made by employers to satisfy employee (plan member) contribution requirements. GASB Statement No. 82 is effective for fiscal years beginning after June 15, 2016. Management has not yet determined the effect of implementation of this Statement will have on Authority's financial statements.

### **Accounting Estimates**

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimate(s) affecting the financial statements include management's estimate of the allowance for doubtful accounts is based on direct identification of management of items that are long outstanding; and management's estimate of depreciation expense which is based on estimated useful life of the respective capital assets. We evaluated the key factors and assumptions used to develop the allowance for doubtful accounts in determining that it is reasonable in relation to the financial statements taken as a whole. During the year ended September 30, 2016, we not aware of any estimated of any significant changes in accounting estimates or in management's judgments relating to such estimates.

### **Difficulties Encountered in Performing the Audit**

We encountered no significant difficulties in dealing with management in performing our audit.

### **Uncorrected and Corrected Misstatements**

Certain uncorrected misstatements accumulated by us (i.e., either identified by us or brought to our attention by management) were identified during the audit and pertaining to the latest period presented, which were determined by the Authority's management to be immaterial, both individual and in the aggregate, to the financial statements as a whole. Management has corrected all such misstatements (See Appendix B – Corrected Adjusting Journal Entries).

### **Disagreements with Management**

For purposes of this letter, professional standards define a disagreement with management as a financial accounting, reporting, or auditing matter, whether or not resolved to my satisfaction, that could be significant to the financial statements or the auditor's report. We are pleased to report that no such disagreements arose during the course of my audit.

### **Management Representations**

We have requested certain representations from management that are included in the attached Appendix A – management representation letter dated April 19, 2017.

### **Management's Consultations with Other Independent Accountants**

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on matters. If a consultation involves application of an accounting principle to the Authority's financial statements or a determination of the type of auditor's opinion that be expressed on those financial statements, our professional standards require the consulting accountant to check with me to determine the consultation has the relevant facts. Management informed us that, and to our knowledge, there were no consultations with other accountants regarding auditing and accounting matters.

### **Major Issues Discussed with Management Prior to Retention**

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Authority's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

### **Other Matters**

With respect to the supplementary information accompanying the financial statements, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with U.S. generally accepted accounting principles, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

### **Fraud and Illegal Acts**

The Authority's was served 18 subpoenas from the federal government from July 2015 to May 2016. The nature of the subpoenas related to potential conflict of interest with its former legal counsel. Additionally, federal and local investigators served the Authority with a search warrant. There was fraud committed by a former employee who resigned and was prosecuted for bribery by Federal Officials. Except for the foregoing matters, we are not aware of any fraud or illegal acts from October 1, 2016 through April 19, 2017.

### **Control Related Matters**

We have issued a separate report to you, dated April 19, 2017, on the Authority's internal control over financial reporting and on its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters, which was based upon the audit performed in accordance with *Government Auditing Standards*. We have also issued a separate report of you, also dated April 19, 2017, involving the Authority's compliance with requirements applicable to each major program and on internal control over compliance in accordance with the Uniform Guidance.

We have communicated to management, in a separate letter also dated April 19, 2017, certain deficiencies and other matters related to the Authority's internal control over financial reporting that we identified during the audit.

Although we have included management's written responses to our comments, such responses have not been subjected to the auditing procedures applied in our audit of the basic financial statements and, accordingly, we do not express an opinion or provide any form of assurance on the appropriateness of the responses or the effectiveness of any corrective actions described therein.

### **Independence**

We are not aware of any relationships between Burger Comer Magliari and the Authority, or any other matters that in our professional judgement, may reasonably be thought to bear on our independence. We confirm that we are independent with respect to the Authority within the meaning of the applicable published rules and pronouncements, interpretations and rulings.

This information is intended solely for the use of Board of Commissioners, the management of Guam Housing and Urban Renewal Authority and the Office of Public Accountability – Guam and is not intended to be, and should not be, used by anyone other than these specified parties.

Very truly yours,

A handwritten signature in black ink that reads "Burger Comer Magliari". The signature is written in a cursive style with a large initial 'B'.

Tamuning, Guam



# GHURA

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**Ray Tenorio**  
 Lt. Governor of Guam

**George A. Santos**  
 Chairman

**Thomas E. B. Borja**  
 Vice Chairman

**Annabelle M. Dancel**  
 Commissioner

**Carl V. Dominguez**  
 Commissioner

**Eliza U. Paulino**  
 Commissioner

**Joseph M. Leon Guerrero**  
 Resident Commissioner

**Michael J. Duenas**  
 Executive Director

**Pedro A. Leon Guerrero, Jr.**  
 Deputy Director

April 19, 2017

**Burger Comer Magliari LLC**  
 Hengi Plaza, Suite 201  
 278 South Marine Drive  
 Tamuning, Guam 96911

This representation letter is provided in connection with your audit of the financial statements of Guam Housing and Urban Renewal Authority, which comprise the statement(s) of financial position as of September 30, 2016, and the related statements of activities and cash flows for the year then ended, and the related notes to the financial statements, for the purpose of expressing an opinion as to whether the financial statements are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States (U.S. GAAP).

Certain representations in this letter are described as being limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement. An omission or misstatement that is monetarily small in amount could be considered material as a result of qualitative factors.

We confirm, to the best of our knowledge and belief, as of April 19, 2017, the following representations made to you during your audit.

## Financial Statements

- 1) We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated October 28, 2016, including our responsibility for the preparation and fair presentation of the financial statements in accordance with U.S. GAAP.
- 2) The financial statements referred to above are fairly presented in conformity with U.S. GAAP.





- 3) We acknowledge our responsibility for 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.
- 4) We acknowledge our responsibility for the design, implementation, and maintenance of internal control to prevent and detect fraud.
- 5) Significant assumptions we used in making accounting estimates, including those measured at fair value, are reasonable.
- 6) Related party relationships and transactions have been appropriately accounted for and disclosed in accordance with U.S. GAAP.
- 7) Adjustments or disclosures have been made for all events, including instances of noncompliance, subsequent to the date of the financial statements that would require adjustment to, or disclosure in, the financial statements or in the schedule of findings and questioned costs.
- 8) The effects of uncorrected misstatements are immaterial, both individually and in the aggregate, to the financial statements as a whole.
- 9) The effects of all known actual or possible litigation, claims, and assessments have been accounted for and disclosed in accordance with U.S. GAAP. To date, there have been no further communications with or decision made by the U.S. Department of Housing and Urban Development for the matters disclosed in Footnote 15 regarding the on-going Section 8 Housing Choice Voucher Program conflict of interest investigation and transfer of excess subsidies from the Section 8 Housing Choice Voucher Program to the Low Rent Housing Program.
- 10) Material concentrations have been appropriately disclosed in accordance with U.S. GAAP.
- 11) Guarantees, whether written or oral, under which the entity is contingently liable, have been properly recorded or disclosed in accordance with U.S. GAAP.
- 12) As part of your audit, you assisted with the preparation of the financial statements, related notes, supplementary information, and schedule of expenditures of federal awards. We acknowledge our responsibility as it relates to those nonattest/nonaudit services, including that we assume all management responsibilities; oversee the services by designating an individual, preferably within senior management, who possesses suitable skill, knowledge, or experience; evaluate the adequacy and results of the services performed; and accept responsibility for the results of the services. We have reviewed, approved, and accepted responsibility for those financial statements, related notes, supplementary information, and schedule of expenditures of federal awards.
- 13) We acknowledge our responsibility for presenting the supplementary information accompanying the financial statements required by the U.S. Department of Housing and Urban Development (HUD) and the information submitted to HUD through the FASS-PH submission templates (collectively, the supplementary information required by HUD) in accordance with HUD's *Uniform Financial Reporting Standards for HUD Housing Programs*, and we believe the supplementary information required by HUD, including its form and content, is fairly presented in accordance with HUD's



*Uniform Financial Reporting Standards for HUD Housing Programs.* The methods of measurement and presentation of the supplementary information required by HUD have not changed from those used in the prior period, and we have disclosed to you any significant assumptions or interpretations underlying the measurement and presentation of the supplementary information.

### **Information Provided**

- 14) We have provided you with:
  - a) Access to all information, of which we are aware, that is relevant to the preparation and fair presentation of the financial statements, such as records, documentation, and other matters, and all audit or relevant monitoring reports, if any, received from funding sources.
  - b) Additional information that you have requested from us for the purpose of the audit.
  - c) Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.
  - d) Minutes of the meetings of Board of Commissioners or summaries of actions of recent meetings for which minutes have not yet been prepared.
- 15) All material transactions have been recorded in the accounting records and are reflected in the financial statements and the schedule of expenditures of federal awards.
- 16) We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
- 17) We have no knowledge of any fraud or suspected fraud that affects the entity and involves—
  - a) Management,
  - b) Employees who have significant roles in internal control, or
  - c) Others where the fraud could have a material effect on the financial statements.
- 18) We have no knowledge of any allegations of fraud or suspected fraud affecting the entity's financial statements communicated by employees, former employees, grantors, regulators, or others.
- 19) We have no knowledge of any instances of noncompliance or suspected noncompliance with provisions of laws, regulations, contracts, or grant agreements, or abuse whose effects should be considered when preparing financial statements.
- 20) We have disclosed to you all known actual or possible litigation, claims, and assessment whose effects should be considered when preparing the financial statements.
- 21) We have disclosed to you the identity of the entity's related parties and all the related party relationships and transactions of which we are aware including any potential conflicts of interest.



- 22) The entity has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral.
- 23) We are responsible for compliance with the laws, regulations, and provisions of contracts and grant agreements applicable to us.
- 24) We have identified and disclosed to you all instances that have occurred or are likely to have occurred of fraud and noncompliance with provisions of laws and regulations that we believe have a material effect on the financial statements or other financial data significant to the audit objectives, and any other instances that warrant the attention of those charged with governance.
- 25) We have identified and disclosed to you all instances that have occurred or are likely to have occurred of noncompliance with provisions of contracts and grant agreements that we believe have a material effect on the determination of financial statement amounts or other financial data significant to the audit objectives.
- 26) We have identified and disclosed to you all instances that have occurred or are likely to have occurred of abuse that could be quantitatively or qualitatively material to the financial statements or other financial data significant to the audit objectives.
- 27) GHURA is an exempt organization under Section 115 of the Internal Revenue Code. Any activities of which we are aware that would jeopardize the entity's tax-exempt status, and all activities subject to tax on unrelated business income or excise or other tax, have been disclosed to you. All required filings with tax authorities are up-to-date.
- 28) With respect to federal award programs:
  - a) We are responsible for understanding and complying with, and have complied with the requirements of Title 2 U.S. *Code of Federal Regulations* (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), including requirements relating to preparation of the schedule of expenditures of federal awards.
  - b) We acknowledge our responsibility for presenting the schedule of expenditures of federal awards (SEFA) and related notes in accordance with the requirements of the Uniform Guidance, and we believe the SEFA, including its form and content, is fairly presented in accordance with the Uniform Guidance. The methods of measurement or presentation of the SEFA have not changed from those used in the prior period, and we have disclosed to you any significant assumptions and interpretations underlying the measurement or presentation of the SEFA.
  - c) We have identified and disclosed to you all of our government programs and related activities subject to the Uniform Guidance compliance audit, and have included in the SEFA, expenditures made during the audit period for all awards provided by federal agencies in the form of federal awards, federal cost-reimbursement contracts, loans, loan guarantees, property (including donated surplus property), cooperative agreements, interest subsidies, insurance, food commodities, direct appropriations, and other direct assistance.



- d) We are responsible for understanding and complying with, and have complied with, the requirements of federal statutes, regulations, and the terms and conditions of federal awards related to each of our federal programs and have identified and disclosed to you the requirements of federal statutes, regulations and the terms and conditions of federal awards that are considered to have a direct and material effect on each major program.
- e) We are responsible for establishing and maintaining, and have established and maintained, effective internal control over compliance for federal programs that provides reasonable assurance that we are managing our federal awards in compliance with federal statutes, regulations, and the terms and conditions of federal awards that could have a material effect on our federal programs. We believe the internal control system is adequate and is functioning as intended.
- f) We have made available to you all federal awards (including amendments, if any) and any other correspondence with federal agencies or pass-through entities relevant to federal programs and related activities.
- g) We have received no requests from a federal agency to audit one or more specific programs as a major program.
- h) We have complied with the direct and material compliance requirements (except for noncompliance disclosed to you), including when applicable, those set forth in the *OMB Compliance Supplement*, relating to federal awards and [have identified and disclosed to you all amounts questioned and all known noncompliance with the direct and material compliance requirements of federal awards or confirm that there were no amounts questioned and no known noncompliance with the direct and material compliance requirements of federal awards].
- i) We have disclosed any communications from federal awarding agencies and pass-through entities concerning possible noncompliance with the direct and material compliance requirements, including communications received from the end of the period covered by the compliance audit to the date of the auditor's report.
- j) We have disclosed to you the findings received and related corrective actions taken for previous audits, attestation engagements, and internal or external monitoring that directly relate to the objectives of the compliance audit, including findings received and corrective actions taken from the end of the period covered by the compliance audit to the date of the auditor's report.
- k) Amounts claimed or used for matching were determined in accordance with relevant guidelines in OMB's Uniform Guidance (2 CFR, part 200, subpart E), OMB Circular A-122, *Cost Principles for Nonprofit Organizations*, and subpart C, Section 23, *Cost Sharing or Matching*, of OMB Circular A-110, *Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Nonprofit Organizations*, as applicable.
- l) We have disclosed to you our interpretation of compliance requirements that may have varying interpretations.



- m) We have made available to you all documentation related to compliance with the direct and material compliance requirements, including information related to federal program financial reports and claims for advances and reimbursements.
- n) We have disclosed to you the nature of any subsequent events that provide additional evidence about conditions that existed at the end of the reporting period affecting noncompliance during the reporting period.
- o) There are no such known instances of noncompliance with direct and material compliance requirements that occurred subsequent to the period covered by the auditor's report.
- p) No changes have been made in internal control over compliance or other factors that might significantly affect internal control, including any corrective action we have taken regarding significant deficiencies or material weaknesses in internal control over compliance subsequent to the period covered by the auditor's report.
- q) Federal program financial reports and claims for advances and reimbursements are supported by the books and records from which the financial statements have been prepared.
- r) The copies of federal program financial reports provided you are true copies of the reports submitted, or electronically transmitted, to the respective federal agency or pass-through entity, as applicable.
- s) We have monitored subrecipients, as necessary, to determine that they have expended subawards in compliance with federal statutes, regulations, and the terms and conditions of the subaward and have met the other pass-through entity requirements of the Uniform Guidance.
- t) We have issued management decisions for audit findings that relate to federal awards made to subrecipients and such management decisions have been issued within six months of acceptance of the audit report by the Federal Audit Clearinghouse. Additionally, we have followed up, ensuring that the subrecipient has taken timely and appropriate action on all deficiencies detected through audits, on-site reviews, and other means that pertain to the federal award provided to the subrecipient.
- u) We have considered the results of subrecipient audits and have made any necessary adjustments to our books and records.
- v) We have charged costs to federal awards in accordance with applicable cost principles.
- w) We are responsible for and have accurately prepared the summary schedule of prior audit findings to include all findings required to be included by the Uniform Guidance, and we have provided you with all information on the status of the follow-up on prior audit findings by federal awarding agencies and pass-through entities, including all management decisions.
- x) We are responsible for and have ensured the reporting package does not contain protected personally identifiable information.



- y) We are responsible for and have accurately prepared the auditee section of the Data Collection Form as required by the Uniform Guidance.
  - z) We are responsible for taking corrective action on each audit finding of the compliance audit and have developed a corrective action plan that meets the requirements of the Uniform Guidance.
  - aa) We have disclosed to you all contracts or other agreements with service organizations, and we have disclosed to you all communications from the service organizations relating to noncompliance at the service organizations.
- 29) We have taken timely and appropriate steps to remedy fraud; noncompliance with provisions of laws, regulations, contracts, and grant agreements; or abuse that you have reported to us.
- 30) We have a process to track the status of audit findings and recommendations.
- 31) We have identified to you any previous audits, attestation engagements, and other studies related to the audit objectives and whether related recommendations have been implemented.
- 32) We have provided our views on reported findings, conclusions, and recommendations, as well as our planned corrective actions, for the report.

Signature: 

Title: Executive Director

Signature: Lucele D. Leon Guerrero


Title: Controller

GUAM HOUSING AND URBAN RENWAL AUTHORITY  
Corrected Adjusting Journal Entries  
September 30, 2016

APPENDIX - B

Fund/Acct #	Account Name	Assets Dr. (Cr.)	Liabilities Dr. (Cr.)	Net Assets Beg. of Year Dr. (Cr.)	Income Statement Dr. (Cr.)
AJE - I					
006.1291.67.8.000.00.0	Deferred outflows of resources	\$ 32,195.16			
009.1291.67.8.000.00.0	Deferred outflows of resources	\$ 7,001.49			
070.1291.67.8.000.00.0	Deferred outflows of resources	\$ 41,026.30			
070.1291.67.8.000.09.2	Deferred outflows of resources	\$ 370.46			
071.1291.67.8.000.00.0	Deferred outflows of resources	\$ 29,109.50			
072.1291.67.8.000.00.0	Deferred outflows of resources	20,724.76			
073.1291.67.8.000.00.0	Deferred outflows of resources	17,228.29			
074.1291.67.8.000.00.0	Deferred outflows of resources	15,098.36			
083.1291.67.8.000.00.0	Deferred outflows of resources	1,763.61			
084.1291.67.8.000.00.0	Deferred outflows of resources	(3,110.71)			
086.1291.67.8.000.00.0	Deferred outflows of resources	19,636.61			
128.1291.67.8.000.00.0	Deferred outflows of resources	48,706.00			
321.1291.67.8.000.00.0	Deferred outflows of resources	12,947.16			
006.2140.67.8.000.00.0	Net pension liability		(158,543.10)		
009.2140.67.8.000.00.0	Net pension liability		(43,989.00)		
070.2140.67.8.000.00.0	Net pension liability		(226,527.48)		
070.2140.67.8.000.09.2	Net pension liability		111.33		
071.2140.67.8.000.00.0	Net pension liability		(184,069.26)		
072.2140.67.8.000.00.0	Net pension liability		(124,162.46)		
073.2140.67.8.000.00.0	Net pension liability		(102,947.06)		
074.2140.67.8.000.00.0	Net pension liability		(68,547.10)		
083.2140.67.8.000.00.0	Net pension liability		(10,463.27)		
084.2140.67.8.000.00.0	Net pension liability		24,019.56		
086.2140.67.8.000.00.0	Net pension liability		(140,969.93)		
128.2140.67.8.000.00.0	Net pension liability		(306,305.30)		
321.2140.67.8.000.00.0	Net pension liability		(81,422.93)		
006.2293.67.8.000.00.0	Deferred inflows of resources		300,380.17		
009.2293.67.8.000.00.0	Deferred inflows of resources		25,965.30		
070.2293.67.8.000.00.0	Deferred inflows of resources		281,400.47		
070.2293.67.8.000.09.2	Deferred inflows of resources		11,466.90		
071.2293.67.8.000.00.0	Deferred inflows of resources		103,070.34		
072.2293.67.8.000.00.0	Deferred inflows of resources		101,884.11		
073.2293.67.8.000.00.0	Deferred inflows of resources		85,804.08		
074.2293.67.8.000.00.0	Deferred inflows of resources		164,886.18		
083.2293.67.8.000.00.0	Deferred inflows of resources		9,094.44		
084.2293.67.8.000.00.0	Deferred inflows of resources		6,985.58		
128.2293.67.8.000.00.0	Deferred inflows of resources		179,384.56		
321.2293.67.8.000.00.0	Deferred inflows of resources		47,712.87		
006.4540.67.8.803.10.1	Pension expense - Section 8 Staff				(174,032.23)
009.4540.67.8.803.09.1	Pension expense - Elderly Housing				(860.44)
070.4540.67.8.803.01.1	Pension expense - COCC				(104,765.12)
071.4540.67.8.803.04.4	Pension expense - Administrative				(47,226.89)
072.4540.67.8.803.04.4	Pension expense - Administrative				(60,448.16)
073.4540.67.8.803.04.4	Pension expense - Administrative				(38,466.64)
074.4540.67.8.803.04.4	Pension expense - Administrative				(126,816.35)
083.1168.67.8.803.01.1	Pension expense - Administrative				(394.78)
084.1168.67.8.803.10.1	Pension expense - Administrative				(27,894.43)
128.4540.67.8.803.06.1	Pension expense - Administrative				78,214.74
321.4540.67.8.803.06.1	Pension expense - Administrative				20,762.90
070.4540.67.8.803.09.2	Pension expense - Tenant Service				(3,082.86)
071.4540.67.8.803.04.5	Pension expense - Tenant Service				34,379.02
072.4540.67.8.803.04.5	Pension expense - Tenant Service				29,326.49
073.4540.67.8.803.04.5	Pension expense - Tenant Service				10,962.81
074.4540.67.8.803.04.5	Pension expense - Tenant Service				4,995.44
086.1168.67.8.803.10.1	Pension expense - Tenant Service				121,333.32
009.4540.67.8.803.09.2	Employee benefit - Pension Expense				11,882.65
071.4540.67.8.803.05.5	Pension expense - Ordinary Maintenance				64,737.29
072.4540.67.8.803.05.5	Pension expense - Ordinary Maintenance				32,675.26
073.4540.67.8.803.05.5	Pension expense - Ordinary Maintenance				27,418.52
074.4540.67.8.803.05.5	Pension expense - Ordinary Maintenance				10,383.47
		242,696.99	(105,781.00)	-	(136,915.99)

I have reviewed the above proposed audit adjustment as of September 30, 2016 and agree that such should be recorded in the general ledger. The above adjustment is not a result of fraud or illegal acts.

  
Lucele D. Leon Guerrero  
GHURA Comptroller