TOWN OF HALIFAX, MASSACHUSETTS
SUGGESTIONS FOR IMPROVEMENT IN ACCOUNTING
PROCEDURES AND INTERNAL CONTROL
JUNE 30, 2014



To the Honorable Board of Selectmen Town of Halifax, Massachusetts

In planning and performing our audit of the financial statements of the Town of Halifax, Massachusetts (the Town) as of and for the year ended June 30, 2014, in accordance with auditing standards generally accepted in the United States of America, we considered the Town's internal accounting control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Town's internal control. Accordingly, we do not express an opinion on the effectiveness of the Town's internal control.

Our consideration of internal control 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 identified in the report on internal control over financial reporting we identified certain deficiencies in internal control that we consider to be material weaknesses, as defined below.

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 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. A material weakness is a deficiency, or combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis.

A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

We are also submitting for your consideration comments and recommendations which are not considered to be significant deficiencies but are intended to improve operations and internal accounting control.

The comments and recommendations presented herewith in are intended to improve the system of internal accounting control or result in other operating efficiencies. The factual accuracy of our comments has been discussed with management to obtain their concurrence before the development of our recommendations for improvement. Matters commented on represent findings during the audit and have not been reviewed subsequent to the date of this report.

A management letter is critical by nature because its purpose is to identify areas where improvements can be made. Accordingly, we have not commented on many positive attributes of the Town's financial management systems. It is also important to understand that it is generally not practical to achieve ideal internal control in the complex governmental accounting environment and we recognize that practical considerations are an important factor in changing administrative practices and internal control. The Town should weigh the advantages and disadvantages of the suggested changes over the present practices and procedures.

We would like acknowledge the courtesy and assistance extended to us by Town personnel during our audit. We also understand that due to the timing of our audit, recommendations and findings presented in previous year may not have been addressed due to time constraints.

This letter is intended solely for the information and use of management, the Board of Selectmen, others within the Town, and is not intended to be and should not be used by anyone other than these specified parties.

Lynch mally marin, LLP Norwell, Massachusetts

April 21, 2015

STATUS OF PRIOR YEAR COMMENTS

As part of our audit of the Town's financial statements for the year ended June 30, 2013, we issued a letter of comments and suggestions dated March 17, 2014, relating to our fiscal year 2013 audit. The Town has considered these comments. The status of our prior year comments is presented below.

Material weakness identified during our prior year audit

Our prior year 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* contained one material weakness: Implement procedures to reconcile cash timely and accurately (2013-01).

There has been no change to the aforementioned material weakness. The items are explained in more detail in the current year comments.

Capital assets

We continue to recommend the Town evaluate procedures to improve the reporting of the capital assets additions and disposals. Procedures should be implemented to have all departments keep track of capital additions and disposals. Invoice support for the additions during the year should be kept in a folder to support the current year activity. Regular communication should be completed to review any disposals during the year (at least semi-annually).

Record all cash accounts on the general ledger

We continue to recommend the Town record the Deputy Collector and planning board accounts in the Town's general ledger. An adjusting entry has been posted to record the \$153,000 of cash on the Town's general ledger.

Implement reconciliation procedures for Tax Title and Tax Deferral

As part of audit procedures, we found there was a variance between the Accountant and the Treasurer for the tax title and tax deferral balances. We recommend the Treasurer periodically and regularly reconcile activity and outstanding balances and review any discrepancies with the Accountant.

Implement reporting procedures for student activity funds

We inquired of the Town Treasurer about the reporting activity of student activity funds of the Town's elementary school. The Treasurer was unable to provide us with an accounting of student activity funds from the school. We recommend the Town Treasurer and Town Accountant implement procedures in accordance with Massachusetts General Law Chapter 71, Section 47 to obtain an accounting of the student activity funds including regular reconciliations.



CURRENT YEAR COMMENTS AND SUGGESTIONS

2014-01 - Implement procedures to reconcile cash timely and accurately (Material Weakness)

The Town must provide adequate procedures to ensure timely and accurate reconciliation of cash accounts to maintain internal controls of the Town's cash balance and bank accounts.

The June 30, 2014 reconciliation of cash accounts was provided during the audit with variances between the treasurer and accountant. Although there was no change to the Town's overall cash position through audit adjustments, we identified differences between the treasurer's reconciliation and the accountant's reconciliation. There is also an unidentified difference between the bank statements and the cashbook. Subsequent to year end, cash reconciliations have not resolved the issues in the reconciliations.

Without complete and accurate reconciliation of cash accounts to the general ledger each month, the Town is at risk of overstating or understanding cash balances.

We understand the Town has incrementally improved its cash reconciliation procedures over the past year and the difference in the variance has not increased significantly, however we continue to recommend the Town provide procedures for maintaining timely and accurate bank reconciliations throughout the year.

During fiscal year 2014, Treasurer implemented a more conventional and standardized cash book and reconciliation system. The Town also implemented a new financial management system that provides for an integrated cash book and general ledger. We expect to be up to date and timely with cash reconciliations by end fiscal year 2015.

Our current year 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* contained one material weakness: Implement procedures to reconcile cash timely and accurately (2014-01). Please see that report and accompanying schedule of findings and responses for additional information.

Internal control recommendations

As a normal component of the audit, we obtain an understanding of the Town's systems and controls and complete walkthroughs and testing to validate compliance with the Town's internal controls and compliance with MGL.

During the procurement testing for 2014, there was a W-9 missing from the sample selected for testing (1 of 8) and a 1099 was not issued. We recommend annually requesting vendors provide W-9's to ensure 1099's can be completed accurately.

During the test of turnovers for 2014, there were some findings related to internal control procedures. There were turnovers selected for testing that did not include signatures from school lunch (1 of 8) and lacked proper supporting detail of the cash and checks collected from library (1 of 8). We recommend the turnover internal control process and procedures be reviewed regularly to ensure internal controls are being followed. Turnover documentation should include the date the department collected the money and a break out between cash and checks.



Internal control recommendations (continued)

From inquiry of the tax collector, it was discovered that letters are not sent to delinquent payers regarding tax title until the beginning of the calendar year. We recommend the collector put delinquent tax payers into tax title in a timely manner to improve the collection process on these accounts.

From review of the surety bonds, the bond amounts for a number of positions were not adequate. We recommend the bonds be reviewed to ensure proper bonding based on the position and amount of money handled for compliance with MGL.
