

**LETTER OF REPRESENTATION TO BE TYPED ON CLIENT LETTERHEAD**  
*(USE THIS TEMPLATE FOR BARS CASH BASIS AUDITS)*

[Date ①]

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To the Washington State Auditor's Office:

We are providing this letter in connection with your audit of Columbia County for the period from January 1, 2017 through December 31, 2017. Representations are in relation to matters existing during or subsequent to the audit period up to the date of this letter.

Certain representations in this letter are described as being limited to matters that are significant or material. Information is considered significant or material if it is probable that it would change or influence the judgment of a reasonable person.

We confirm, to the best of our knowledge and belief, having made appropriate inquiries to be able to provide our representations, the following representations made to you during your audit. If we subsequently discover information that would change our representations related to this period, we will notify you in a timely manner.

**General Representations:**

1. We have provided you with unrestricted access to people you wished to speak with and made available all relevant and requested information of which we are aware, including:
  - a. Financial records and related data.
  - b. Minutes of the meetings of the governing body or summaries of actions of recent meetings for which minutes have not yet been prepared.
  - c. Other internal or external audits, examinations, investigations or studies that might concern the objectives of the audit and the corrective action taken to address significant findings and recommendations.
  - d. Communications from regulatory agencies, government representatives or others concerning possible material noncompliance, deficiencies in internal control or other matters that might concern the objectives of the audit.
  - e. Related party relationships and transactions.
  - f. Results of our internal assessment of business risks and risks related to financial reporting, compliance and fraud.
  
2. We acknowledge our responsibility for compliance with requirements related to confidentiality of certain information, such as HIPAA requirements, and have notified you

whenever records or data containing information subject to any confidentiality requirements were made available.

3. We acknowledge our responsibility for compliance with applicable laws, regulations, contracts and grant agreements.
4. We have identified and disclosed all laws, regulations, contracts and grant agreements that could have a direct and material effect on the determination of financial statement amounts, including legal and contractual provisions for reporting specific activities in separate funds.
5. Except as discussed with you, we have complied with all material aspects of laws, regulations, contracts and grant agreements.
6. Except as discussed with you, we have established adequate procedures and controls to safeguard public resources and ensure compliance with applicable laws and regulations.
7. We acknowledge our responsibility for establishing and maintaining effective internal controls over compliance with applicable laws and regulations and safeguarding of public resources, including controls to prevent and detect fraud.
8. Except as reported to you in accordance with RCW 43.09.185, we have no knowledge of any fraud, allegations of fraud or suspected fraud involving management, employees or others.
9. In accordance with RCW 43.09.200, all material events and transactions have been properly recorded in the financial records.
10. We are responsible for taking corrective action on audit findings and have developed a corrective action plan.

**Additional representations related to the financial statements:** ③

11. We acknowledge our responsibility for fair presentation of the financial statements and believe financial statements are fairly presented in accordance with the *Budgeting, Accounting and Reporting Standards Manual* (BARS Manual), which is a comprehensive basis of accounting other than accounting principles generally accepted in the United States of America.
12. We acknowledge our responsibility for establishing and maintaining effective internal control over financial reporting.
13. The financial statements properly classify all funds and activities.
14. Revenues are appropriately classified by fund and account in accordance with the BARS Manual.
15. Expenses are appropriately classified by fund and account, and allocations have been made on a reasonable basis.

16. Ending cash and investments are properly classified as reserved and unreserved.
17. Significant assumptions we used in making accounting estimates are reasonable.
18. The following have been properly classified, reported and disclosed in the financial statements, as applicable:
  - a. Interfund, internal, and intra-entity activity and balances.
  - b. Related-party transactions, including sales, purchases, loans, transfers, leasing arrangements, and guarantees, and amounts receivable from or payable to related parties.
  - c. Joint ventures and other related organizations.
  - d. Guarantees under which the government is contingently liable.
  - e. All events occurring subsequent to the fiscal year end through the date of this letter that would require adjustment to, or disclosure in, the financial statements.
  - f. Effects of all known actual or possible litigation, claims, assessments, violations of laws, regulations, contracts or grant agreements and other loss contingencies.
19. We have accurately disclosed to you all known actual or possible pending or threatened litigation, claims or assessments whose effects should be considered when preparing the financial statements. We have also accurately disclosed to you the nature and extent of our consultation with outside attorneys concerning litigation, claims and assessments.
20. We acknowledge our responsibility to include all necessary and applicable disclosures required by the BARS Manual, including:
  - a. Description of the basis of accounting, summary of significant accounting policies and how this differs from Generally Accepted Accounting Principles (GAAP).
  - b. Disclosures similar to those required by GAAP to the extent they are applicable to items reported in the financial statements.
  - c. Any additional disclosures beyond those specifically required by the BARS Manual that may be necessary for the statements to be fairly presented.
21. We acknowledge our responsibility for reporting supplementary information (the Schedule of Liabilities and the Schedule of Expenditures of Federal Awards) in accordance with applicable requirements and believe supplementary information is fairly presented, in both form and content in accordance with those requirements.
22. We have disclosed to you all significant changes to the methods of measurement and presentation of supplementary information, reasons for any changes and all significant assumptions or interpretations underlying the measurement or presentation.
23. We believe there are no uncorrected misstatements that would be material individually and in the aggregate to the financial statements taken as a whole.

24. We acknowledge our responsibility not to publish any document containing the audit report with any change in the financial statements, supplementary and other information referenced in the auditor's report. We will contact the auditor if we have any needs for publishing the audit report with different content included.

**Additional representations related to expenditures under federal grant programs:** ⑤

25. We acknowledge our responsibility for complying, and have complied, with the requirements of 2 CFR § 200 *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*.
26. With regards to your audit of federal grant programs, we have made available all relevant and requested information of which we are aware, including:
- a. All federal awards and related grant agreements (including amendments, if any), contracts with pass-through entities, service organizations and vendors, and correspondence.
  - b. All communications from federal awarding agencies, vendors, service organizations or pass-through entities concerning possible noncompliance.
  - c. All information regarding corrective actions taken and management decisions or follow-up work performed by federal or pass-through agencies on any findings reported in the past.
  - d. All documentation related to the compliance requirements, including information related to federal program financial reports and claims for advances and reimbursements.
  - e. Interpretations or other support for any situations where compliance with requirements might be questionable or unclear.
27. Except as reported by the audit, we have identified and complied with all direct and material compliance requirements of federal awards.
28. Management is responsible for establishing effective internal control and has, except as reported by the audit, maintained sufficient control over federal programs to provide reasonable assurance that awards are managed in compliance with laws, regulations, contracts or grant agreements that could have a material effect on each of our federal awards.
29. Federal program financial reports and claims for advances and reimbursements are supported by the accounting records from which the basic financial statements have been prepared, and are prepared on a basis consistent with the Schedule of Expenditures of Federal Awards.
30. Copies of federal program reports provided to you are true copies of the reports submitted, or electronically transmitted, to federal agencies or pass-through agencies, as applicable.

31. We are responsible for, and will accurately prepare, the auditee section of the Data Collection Form as required by the Uniform Guidance.

**Additional representations related to federal grants passed through to subrecipients:** ⑥

32. We have advised our subrecipients of requirements imposed on them by Federal laws, regulations, contracts or grant agreements as well as any supplemental requirements we impose as a condition of receiving Federal awards.

33. We have monitored the activities of our subrecipients as necessary to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations, contracts or grant agreements.

34. We have determined that subrecipients expending \$750,000 or more in Federal awards during the subrecipient's fiscal year have met the audit requirements of 2 CFR § 200.501 for that fiscal year. ⑦

35. When applicable, we have issued a management decision on audit findings within six months after receipt of the subrecipient's audit report and ensured that the subrecipient has taken appropriate and timely corrective action. ⑦

36. We have considered the results of our subrecipients' audits and made any necessary adjustments to our own accounting records. ⑦

\_\_\_\_\_  
(Signature)  
[Name and Title]  
(Executive Officer ⑧)

\_\_\_\_\_  
(Signature)  
[Name and Title]  
(Finance Officer ⑧)

## NOTES TO THE PREPARER

- ① The date of the letter should match the date of the reports issued by the auditor. This date should be obtained from the auditor.

The period covered by the representation letter must be the same as the period described in the audit reports.

- ② Only include “Except as ...” if there is a reported or disclosed issue or exception related to the representation. This representation should be included both when a known issue was disclosed and when the auditor is reporting on issues previously unknown to management. When issues are reported, this representation signifies that all relevant information regarding reported issues has been shared with the auditor, in addition to complete disclosure of all known issues.

- ③ Only include this section when a financial statement audit has been conducted.

- ④ The auditor will communicate all non-trivial known or likely misstatements identified to management. If you have not yet received this communication or are unclear as to the nature, amount or effect of any uncorrected misstatements, contact the auditor.

If management believes certain items identified by the auditor are not misstatements, management’s belief may be acknowledged by adding to the representation, for example, “We do not agree that items XX and XX constitute misstatements because {*description of reasons*}.”

- ⑤ Only include this section when a Single Audit has been conducted on federal grant programs under 2 CFR § 200 *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

- ⑥ Only include this section when a Single Audit has been conducted and when the government has subrecipients expending Federal awards as defined by 2 CFR § 200.93.

- ⑦ Only include these representations when the government has subrecipients expending \$750,000 or more in Federal awards in a year, which would cause the subrecipient to have their own Single Audit.

- ⑧ The letter should be signed by members of management with overall responsibility for financial and operating matters who are responsible and knowledgeable about, directly or through others, the matters covered in the representations. Generally, the letter is signed by the chief executive officer (e.g. city manager, mayor, superintendent) and the chief financial officer (e.g. finance officer, business manager, clerk/treasurer).

Any deviation from standard language provided in the template above should be discussed with the auditor. If you need clarification on any point or feel that you cannot make a representation, please contact the auditor.