

**TOWN OF CULPEPER, VIRGINIA**

**COMMENTS ON INTERNAL CONTROL AND  
OTHER SUGGESTIONS FOR YOUR  
CONSIDERATION**

**June 30, 2017**

## CONTENTS

	Page
INDEPENDENT AUDITOR'S REPORT ON COMMENTS AND SUGGESTIONS .....	3
CURRENT YEAR COMMENTS .....	5
STATUS OF PRIOR YEAR COMMENTS .....	6
ACCOUNTING AND OTHER MATTERS .....	10

## INDEPENDENT AUDITOR'S REPORT ON COMMENTS AND SUGGESTIONS

To the Honorable Members of Town Council  
Town of Culpeper, Virginia

In planning and performing our audit of the financial statements of the governmental activities, the business-type activities, the discretely presented component unit, each major fund and the remaining fund information of the Town of Culpeper, Virginia (the "Town") as of and for the year ended June 30, 2017, in accordance with auditing standards generally accepted in the United States of America, we considered its internal control over financial reporting (internal control) as a basis for designing our auditing procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements and to comply with other applicable standards, such as *Government Auditing Standards* and the regulations set forth by the Uniform Guidance, 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 first paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. In addition, because of inherent limitations in internal control, including the possibility of management override of controls, misstatements due to error or fraud may occur and not be detected by such controls. As discussed below, we identified certain deficiencies in internal control over financial reporting that we consider to be material weaknesses.

*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 Town'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.

If material weaknesses or significant deficiencies were identified during our procedures, they are appropriately designated as such in this report. Additional information on material weaknesses or significant deficiencies and compliance and other matters is included in the ***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*** which should be read in conjunction with this report.

Additionally, during our audit, we may have become aware of certain other matters that provide opportunities for improving your financial reporting system and/or operating efficiency. Such comments and suggestions regarding these matters are also included in the attached report, but are not designated as a material weakness or significant deficiency. Since our audit is not designed to include a detailed review of all systems and procedures, these comments should not be considered as being all-inclusive of areas where improvements might be achieved. We also have included information on accounting and other matters that we believe is important enough to merit consideration by management and those charged with governance. It is our hope that our suggestions will be taken in the constructive light in which they are offered.

We have already discussed these comments and suggestions with management, and we will be pleased to discuss them in further detail at your convenience, to perform any additional study of these matters, or to assist you in implementing the recommendations. A review of the status of prior year comments and suggestions is included on page 6.

This report is intended solely for the information and use of Town Council, management, and state and federal regulatory agencies and is not intended to be, and should not be, used by anyone other than these specified parties.

*Brown, Edwards & Company, L.L.P.*

CERTIFIED PUBLIC ACCOUNTANTS

Roanoke, Virginia  
November 21, 2017

**TOWN OF CULPEPER, VIRGINIA**  
**CURRENT YEAR COMMENTS**

**FINANCIAL REPORTING COMMENTS**

**Bank Reconciliation (Material Weakness)**

Monthly bank account reconciliations are the primary internal control procedure relating to the Town's cash accounts. During fiscal year 2017, bank account reconciliations were prepared; however, the accounts were not completely reconciled. As of June 30, 2017, there was an unreconciled amount of approximately \$49,000 in the regular checking account. Although this amount may appear not to be material to the overall financial position of the Town, it may obscure significant but offsetting items (such as bank errors or improperly recorded transactions) that would be a cause for investigation if the items were apparent. Unreconciled amounts should be investigated and not be allowed to carry over from month to month.

**TOWN OF CULPEPER, VIRGINIA**  
**STATUS OF PRIOR YEAR COMMENTS**

**FINANCIAL REPORTING COMMENTS**

**Accounts Receivable Voids**

During testing of the existence of miscellaneous accounts receivable, we noted numerous voids in which the transactions were duplicated and balances were not timely written off. Excessive voids in accounts receivable without timely approval increase the risk that misstatements due to error or fraud will go undetected. We recommend that all voided transactions be timely approved by the appropriate supervisor. This approval will mitigate the risk of irregularities in accounting records.

**Current Status:** *No longer applicable in the current year.*

**Capital Asset Listings**

During testing of capital assets, we noted that complete asset listings, of construction in progress were not reviewed by department supervisors on a regular basis. As a result, there were several misstatements in capital assets related to the timing of when assets were placed in service. We recommend that capital asset listings of construction in progress be reviewed by department supervisors on a quarterly basis. This process will ensure that assets are placed in service in a timely manner.

The listing of capital assets includes descriptions that are general in nature which make it difficult to identify assets that are disposed or obsolete. It is recommended that assets on the capital asset listing be specifically identified and fully depreciated or obsolete assets that are no longer in use be removed.

**Current Status:** *No longer applicable in the current year.*

**Inventory Counts**

During our observation of inventory, we noted that inventory items at public works and the wastewater treatment facility were not properly organized and were difficult to find for our test counts. The unorganized nature of the inventory stock resulted in several errors. In particular, we noted six errors out of ten inventory test counts at the wastewater treatment facility. We recommend that inventory be appropriately organized and due care be taken when performing inventory counts.

**Current Status:** *This comment is still applicable in the current year.*

## TOWN OF CULPEPER, VIRGINIA

### STATUS OF PRIOR YEAR COMMENTS (Continued)

#### FINANCIAL REPORTING COMMENTS (Continued)

##### **Reconciliations and Adjustments (Aggregate Prior Year Material Weakness)**

The Town should adopt a policy requiring monthly reconciliation of all significant balance sheet accounts to their subsidiary ledgers in order to ensure the accuracy of the monthly financial statements and underlying subsidiary ledgers. Balance sheet reconciliations quickly identify errors and needed corrections. If reconciliations are performed infrequently, errors and adjustments can occur, resulting in the need for significant corrections when the reconciliations are performed. Any reconciling differences should be corrected before the books are closed for the month end and in no case later than the end of the following month. These reconciliations, if performed, would have significantly decreased the number of audit adjustments necessary in the current year. All of these reconciliations should be performed by Town staff and reviewed and approved by the Director of Finance/Treasurer.

The following are a list of suggested reconciliations that the Town should perform:

- All cash and investment accounts should be reconciled to the general ledger using deposits in transit and outstanding checks.
- Tax ledgers should be reconciled to tie out billings, collections, abatements, and accounts receivable for personal property and real estate.
- Miscellaneous accounts receivable, lodging tax, meals tax, due from other governments, and other receivables should be reconciled to supporting documentation.
- Utility accounts receivable and revenue accounts should be reconciled to cash receipts and billings for the month.
- Prepaids should be tied from the general ledger to an Excel spreadsheet to track the monthly write-off amount.
- Due to/due froms and transfers between funds should be reconciled to make sure they net to zero.
- Accounts payable should be reconciled to the subsidiary ledger.
- Customer deposits payable should be reconciled to the subsidiary ledger and amongst the various funds.
- Capital Assets should be reconciled on a quarterly basis beginning with prior year balance, adding purchases, moving transfers from construction in progress to depreciable accounts, and subtracting disposals.
- Debt should be reconciled to the amortization schedule provided by the lender including, principal and interest accruals and proceeds.
- The Town should reconcile various payroll liability accounts including VRS, Health Insurance, etc.
- Fund balance/net assets for each fund should be reconciled to the prior year audit report once a year and no adjustments should be made to these amounts unless material errors in prior reported amounts are encountered.

**Current Status:** *No longer applicable in the current year.*

**TOWN OF CULPEPER, VIRGINIA**  
**STATUS OF PRIOR YEAR COMMENTS**  
**(Continued)**

**FINANCIAL REPORTING COMMENTS (Continued)**

**Inventory Valuation**

In order to abide by the Town's adopted inventory method of FIFO, inventory items should be carried at historical cost. Under the current inventory valuation method, all items are recorded at the last purchased price for that particular item. This may not be the price at which the item was purchased. We recommend fully implementing the new inventory software through Munis to track inventory purchases and usage.

**Current Status:** *No longer applicable in the current year.*

**SEGREGATION OF DUTIES COMMENTS (Significant Deficiency)**

One of the more important aspects of any internal control is segregation of duties. In an ideal system of internal controls, no individual would perform more than one duty in connection with any transaction or series of transactions. In particular, no one individual should have access to both physical assets and the related accounting records. Such access may allow errors or irregularities to occur and either not be detected or concealed.

Specific items related to segregation of duties are discussed below:

- We noted that the Interim Treasurer has access to cash receipts, the accounts payable module, the payroll module, the ability to post journal entries, and bank reconciliation duties. In a well-controlled environment, these duties would be separated. We understand that due to the size of the Finance Department, it may be impractical to completely separate all of these duties.

**Current Status:** *No longer applicable in the current year.*

**Administrator Logs**

Based on our discussions with Director of IT, we determined that the Town is not keeping administrator logs for either the Active Directory network system or the Great Plains application. This increases the risk that inappropriate activity could occur and go undetected at the administrator level of both systems. We recommend that the Town configure the logs to record administrator activity and have that log reviewed by a non-administrator on a regular basis.

**Current Status:** *No longer applicable in the current year.*



**TOWN OF CULPEPER, VIRGINIA**  
**STATUS OF PRIOR YEAR COMMENTS**  
**(Continued)**

**SEGREGATION OF DUTIES COMMENTS (Significant Deficiency) (Continued)**

**DISASTER RECOVERY AND BACKUP AND RESTORE**

Per review of documentation and through discussion with the Director of IT, we determined that the Town does not have a formally documented disaster recovery plan. The Director has received some templates that could be used to create a plan but does not have the available resources currently to complete the plan. Without a disaster recovery plan, the Town has an increased risk of an extended interruption of service in the event of a disaster or emergency. We recommend that the Town have a formalized disaster recovery plan drafted, approved, and tested on an annual basis.

**Current Status:** *No longer applicable in the current year.*

**TOWN OF CULPEPER, VIRGINIA**  
**ACCOUNTING AND OTHER MATTERS**

In this section, we would like to make you aware of certain confirmed and potential changes that are on the horizon that may affect your financial reporting and audit.

**GASB STATEMENT NO. 75**

**GASB Statement No. 75**, *Accounting and Financial Reporting for Postemployment Benefits other than Pensions* improves accounting and financial reporting by state and local governments for postemployment benefits other than pensions (other postemployment benefits or OPEB). It also improves information provided by state and local governmental employers about financial support for OPEB that is provided by other entities. This Statement results from a comprehensive review of the effectiveness of existing standards of accounting and financial reporting for all postemployment benefits (pensions and OPEB) with regard to providing decision-useful information, supporting assessments of accountability and interperiod equity, and creating additional transparency.

This Statement 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, for OPEB*. Statement No. 74, *Financial Reporting for Postemployment Benefit Plans other than Pension Plans*, establishes new accounting and financial reporting requirements for OPEB plans.

The scope of this Statement addresses accounting and financial reporting for OPEB that is provided to the employees of state and local governmental employers. This Statement establishes standards for recognizing and measuring liabilities, deferred outflows of resources, deferred inflows of resources, and expense/expenditures. For defined benefit OPEB, this Statement identifies the methods and assumptions that are required to be used to project benefit payments, discount projected benefit payments to their actuarial present value, and attribute that present value to periods of employee service. Note disclosure and required supplementary information requirements about defined benefit OPEB also are addressed.

In addition, this Statement details the recognition and disclosure requirements for employers with payables to defined benefit OPEB plans that are administered through trusts that meet the specified criteria and for employers whose employees are provided with defined contribution OPEB. This Statement also addresses certain circumstances in which a nonemployer entity provides financial support for OPEB of employees of another entity.

In this Statement, distinctions are made regarding the particular requirements depending upon whether the OPEB plans through which the benefits are provided are administered through trusts that meet the following criteria:

- Contributions from employers and nonemployer contributing entities to the OPEB plan and earnings on those contributions are irrevocable.
- OPEB plan assets are dedicated to providing OPEB to plan members in accordance with the benefit terms.
- OPEB plan assets are legally protected from the creditors of employers, nonemployer contributing entities, the OPEB plan administrator, and the plan members.

## **TOWN OF CULPEPER, VIRGINIA**

### **ACCOUNTING AND OTHER MATTERS (Continued)**

#### **GASB STATEMENT NO. 75 (Continued)**

**GASB Statement No. 75** will be effective for the year ending June 30, 2018. To prepare for implementation of this new Statement, management should consult with the entity's external OPEB actuarial firm to ensure timely reporting and compliance with the requirements of this Statement.

#### **GASB STATEMENT NO. 81**

**GASB Statement No. 81, *Irrevocable Split-Interest Agreements*** will improve accounting and financial reporting for irrevocable split-interest agreements by providing recognition and measurement guidance for situations in which a government is a beneficiary of the agreement.

Split-interest agreements are a type of giving agreement used by donors to provide resources to two or more beneficiaries, including governments. Split interest agreements can be created through trusts – or other legally enforceable agreements with characteristics that are equivalent to split-interest agreements – in which a donor transfers resources to an intermediary to hold and administer for the benefit of a government and at least one other beneficiary. Examples of these types of agreements include charitable lead trusts, charitable remainder trusts, and life-interests in real estate.

This Statement requires that a government that receives resources pursuant to an irrevocable split-interest agreement recognize assets, liabilities, and deferred inflows of resources at the inception of the agreement. Furthermore, this Statement requires that a government recognize assets representing its beneficial interests in irrevocable split-interest agreements that are administered by a third party, if the government controls the present service capacity of the beneficial interests. This Statement requires that a government recognize revenue when the resources become applicable to the reporting period.

**GASB Statement No. 81** will be effective for the year ending June 30, 2018.

#### **GASB STATEMENT NO. 82**

The objective of **GASB Statement No. 82, *Pension Issues – an amendment of GASB Statements No. 67, No. 68, and No. 73*** is to address certain issues that have been raised with respect to Statements No. 67, *Financial Reporting for Pension Plans*, No. 68, *Accounting and Financial Reporting for Pensions*, and No. 73, *Accounting and Financial Reporting for Pensions and Related Assets* that are not within the scope of GASB Statement 68, and Amendments to Certain Provisions of GASB Statements 67 and 68. Specifically, this Statement addresses issues regarding 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.

The requirements of this Statement are effective for the year ended June 30, 2017, except for the requirements of this Statement for the selection of assumptions in a circumstance in which an employer's pension liability is measured as of a date other than the employer's most recent fiscal year-end. In that circumstance, the requirements for the selection of assumptions are effective for that employer in the first reporting period in which the measurement date of the pension liability is on or after June 15, 2017.

## TOWN OF CULPEPER, VIRGINIA

### ACCOUNTING AND OTHER MATTERS (Continued)

#### **GASB STATEMENT NO. 83**

**GASB Statement No. 83**, *Certain Asset Retirement Obligations* addresses accounting and financial reporting for certain asset retirement obligations (AROs). An ARO is a legally enforceable liability associated with the retirement of a tangible capital asset. A government that has legal obligations to perform future asset retirement activities related to its tangible capital assets should recognize a liability based on the guidance in this Statement.

This Statement establishes criteria for determining the timing and pattern of recognition of a liability and a corresponding deferred outflow of resources for AROs. This Statement requires that recognition occur when the liability is both incurred and reasonably estimable. The determination of when the liability is incurred should be based on the occurrence of external laws, regulations, contracts, or court judgments, together with the occurrence of an internal event that obligates a government to perform asset retirement activities. Laws and regulations may require governments to take specific actions to retire certain tangible capital assets at the end of the useful lives of those capital assets, such as decommissioning nuclear reactors and dismantling and removing sewage treatment plants. Other obligations to retire tangible capital assets may arise from contracts or court judgments. Internal obligating events include the occurrence of contamination, placing into operation a tangible capital asset that is required to be retired, abandoning a tangible capital asset before it is placed into operation, or acquiring a tangible capital asset that has an existing ARO.

This Statement requires the measurement of an ARO to be based on the best estimate of the current value of outlays expected to be incurred. The best estimate should include probability weighting of all potential outcomes, when such information is available or can be obtained at reasonable cost. If probability weighting is not feasible at reasonable cost, the most likely amount should be used. This Statement requires that a deferred outflow of resources associated with an ARO be measured at the amount of the corresponding liability upon initial measurement.

This Statement requires the current value of a government's AROs to be adjusted for the effects of general inflation or deflation at least annually. In addition, it requires a government to evaluate all relevant factors at least annually to determine whether the effects of one or more of the factors are expected to significantly change the estimated asset retirement outlays. A government should re-measure an ARO only when the result of the evaluation indicates there is a significant change in the estimated outlays. The deferred outflows of resources should be reduced and recognized as outflows of resources (for example, as an expense) in a systematic and rational manner over the estimated useful life of the tangible capital asset.

A government may have a minority share (less than 50 percent) of ownership interest in a jointly owned tangible capital asset in which a nongovernmental entity is the majority owner and reports its ARO in accordance with the guidance of another recognized accounting standards setter. Additionally, a government may have a minority share of ownership interest in a jointly owned tangible capital asset in which no joint owner has a majority ownership, and a nongovernmental joint owner that has operational responsibility for the jointly owned tangible capital asset reports the associated ARO in accordance with the guidance of another recognized accounting standards setter. In both situations, the government's minority share of an ARO should be reported using the measurement produced by the nongovernmental majority owner or the nongovernmental minority owner that has operational responsibility, without adjustment to conform to the liability measurement and recognition requirements of this Statement.

## **TOWN OF CULPEPER, VIRGINIA**

### **ACCOUNTING AND OTHER MATTERS (Continued)**

#### **GASB STATEMENT NO. 83 (Continued)**

In some cases, governments are legally required to provide funding or other financial assurance for their performance of asset retirement activities. This Statement requires disclosure of how those funding and assurance requirements are being met by a government, as well as the amount of any assets restricted for payment of the government's AROs, if not separately displayed in the financial statements.

This Statement also requires disclosure of information about the nature of a government's AROs, the methods and assumptions used for the estimates of the liabilities, and the estimated remaining useful life of the associated tangible capital assets. If an ARO (or portions thereof) has been incurred by a government but is not yet recognized because it is not reasonably estimable, the government is required to disclose that fact and the reasons therefore. This Statement requires similar disclosures for a government's minority shares of AROs.

**GASB Statement No. 83** will be effective for the year ending June 30, 2019.

#### **GASB STATEMENT NO. 84**

The objective of **GASB Statement No. 84**, *Fiduciary Activities* is to improve guidance regarding the identification of fiduciary activities for accounting and financial reporting purposes and how those activities should be reported.

This Statement establishes criteria for identifying fiduciary activities of all state and local governments. The focus of the criteria generally is on (1) whether a government is controlling the assets of the fiduciary activity and (2) the beneficiaries with whom a fiduciary relationship exists. Separate criteria are included to identify fiduciary component units and postemployment benefit arrangements that are fiduciary activities.

An activity meeting the criteria should be reported in a fiduciary fund in the basic financial statements. Governments with activities meeting the criteria should present a statement of fiduciary net position and a statement of changes in fiduciary net position. An exception to that requirement is provided for a business-type activity that normally expects to hold custodial assets for three months or less.

This Statement describes four fiduciary funds that should be reported, if applicable: (1) pension (and other employee benefit) trust funds, (2) investment trust funds, (3) private-purpose trust funds, and (4) custodial funds. Custodial funds generally should report fiduciary activities that are not held in a trust or equivalent arrangement that meets specific criteria.

A fiduciary component unit, when reported in the fiduciary fund financial statements of a primary government, should combine its information with its component units that are fiduciary component units and aggregate that combined information with the primary government's fiduciary funds.

This Statement also provides for recognition of a liability to the beneficiaries in a fiduciary fund when an event has occurred that compels the government to disburse fiduciary resources. Events that compel a government to disburse fiduciary resources occur when a demand for the resources has been made or when no further action, approval, or condition is required to be taken or met by the beneficiary to release the assets.

**GASB Statement No. 84** will be effective for the year ending June 30, 2020.

## TOWN OF CULPEPER, VIRGINIA

### ACCOUNTING AND OTHER MATTERS (Continued)

#### **GASB STATEMENT NO. 85**

The objective of **GASB Statement No. 85**, *Omnibus 2017*, is to address practice issues that have been identified during implementation and application of certain GASB Statements. This Statement addresses a variety of topics including issues related to blending component units, goodwill, fair value measurement and application, and postemployment benefits (pensions and other postemployment benefits (OPEB)). Specifically, this Statement addresses the following topics:

- Blending a component unit in circumstances in which the primary government is a business-type activity that reports in a single column for financial statement presentation
- Reporting amounts previously reported as goodwill and “negative” goodwill
- Classifying real estate held by insurance entities
- Measuring certain money market investments and participating interest earning investment contracts at amortized cost
- Timing of the measurement of pension or OPEB liabilities and expenditures recognized in financial statements prepared using the current financial resources measurement focus
- Recognizing on-behalf payments for pensions or OPEB in employer financial statements
- Presenting payroll-related measures in required supplementary information for purposes of reporting by OPEB plans and employers that provide OPEB
- Classifying employer-paid member contributions for OPEB
- Simplifying certain aspects of the alternative measurement method for OPEB
- Accounting and financial reporting for OPEB provided through certain multiple-employer defined benefit OPEB plans.

**GASB Statement No. 85** will be effective for the year ending June 30, 2018.

#### **GASB STATEMENT NO. 86**

The primary objective of **GASB Statement No. 86**, *Certain Debt Extinguishment Issues* is to improve consistency in accounting and financial reporting for in-substance defeasance of debt by providing guidance for transactions in which cash and other monetary assets acquired with only existing resources—resources other than the proceeds of refunding debt—are placed in an irrevocable trust for the sole purpose of extinguishing debt. This Statement also improves accounting and financial reporting for prepaid insurance on debt that is extinguished and notes to financial statements for debt that is defeased in substance.

**TOWN OF CULPEPER, VIRGINIA**  
**ACCOUNTING AND OTHER MATTERS (Continued)**

**GASB STATEMENT NO. 86 (Continued)**

*In-Substance Defeasance of Debt Using Only Existing Resources*

Statement No. 7, *Advance Refundings Resulting in Defeasance of Debt*, requires that debt be considered defeased in substance when the debtor irrevocably places cash or other monetary assets acquired with refunding debt proceeds in a trust to be used solely for satisfying scheduled payments of both principal and interest of the defeased debt. The trust also is required to meet certain conditions for the transaction to qualify as an in-substance defeasance. This Statement establishes essentially the same requirements for when a government places cash and other monetary assets acquired with only existing resources in an irrevocable trust to extinguish the debt. However, in financial statements using the economic resources measurement focus, governments should recognize any difference between the reacquisition price (the amount required to be placed in the trust) and the net carrying amount of the debt defeased in substance using only existing resources as a separately identified gain or loss in the period of the defeasance.

Governments that defease debt using only existing resources should provide a general description of the transaction in the notes to financial statements in the period of the defeasance. In all periods following an in-substance defeasance of debt using only existing resources, the amount of that debt that remains outstanding at period-end should be disclosed.

*Prepaid Insurance Related to Extinguished Debt*

For governments that extinguish debt, whether through a legal extinguishment or through an in-substance defeasance, this Statement requires that any remaining prepaid insurance related to the extinguished debt be included in the net carrying amount of that debt for the purpose of calculating the difference between the reacquisition price and the net carrying amount of the debt.

*Additional Disclosure for All In-Substance Defeasance Transactions*

One of the criteria for determining an in-substance defeasance is that the trust holds only monetary assets that are essentially risk-free. If the substitution of essentially risk-free monetary assets with monetary assets that are not essentially risk-free is not prohibited, governments should disclose that fact in the period in which the debt is defeased in substance. In subsequent periods, governments should disclose the amount of debt defeased in substance that remains outstanding for which that risk of substitution exists.

**GASB Statement No. 86** will be effective for the year ending June 30, 2018.

## TOWN OF CULPEPER, VIRGINIA

### ACCOUNTING AND OTHER MATTERS (Continued)

#### **GASB STATEMENT NO. 87**

The objective of **GASB Statement No. 87, *Leases***, is to better meet the information needs of financial statement users by improving accounting and financial reporting for leases by governments. This Statement increases the usefulness of governments' financial statements by requiring recognition of certain lease assets and liabilities for leases that previously were classified as operating leases and recognized as inflows of resources or outflows of resources based on the payment provisions of the contract. It establishes a single model for lease accounting based on the foundational principle that leases are financings of the right to use an underlying asset. Under this Statement, a lessee is required to recognize a lease liability and an intangible right-to-use lease asset, and a lessor is required to recognize a lease receivable and a deferred inflow of resources, thereby enhancing the relevance and consistency of information about governments' leasing activities.

#### *Definition of a Lease*

A lease is defined as a contract that conveys control of the right to use another entity's nonfinancial asset (the underlying asset) as specified in the contract for a period of time in an exchange or exchange-like transaction. Examples of nonfinancial assets include buildings, land, vehicles, and equipment. Any contract that meets this definition should be accounted for under the leases guidance, unless specifically excluded in this Statement.

#### *Lease Term*

The lease term is defined as the period during which a lessee has a non-cancelable right to use an underlying asset, plus the following periods, if applicable:

- Periods covered by a lessee's option to extend the lease if it is reasonably certain, based on all relevant factors, that the lessee will exercise that option
- Periods covered by a lessee's option to terminate the lease if it is reasonably certain, based on all relevant factors, that the lessee will not exercise that option
- Periods covered by a lessor's option to extend the lease if it is reasonably certain, based on all relevant factors, that the lessor will exercise that option
- Periods covered by a lessor's option to terminate the lease if it is reasonably certain, based on all relevant factors, that the lessor will not exercise that option.

A fiscal funding or cancellation clause should affect the lease term only when it is reasonably certain that the clause will be exercised.

Lessees and lessors should reassess the lease term only if one or more of the following occur:

- The lessee or lessor elects to exercise an option even though it was previously determined that it was reasonably certain that the lessee or lessor would not exercise that option.
- The lessee or lessor elects not to exercise an option even though it was previously determined that it was reasonably certain that the lessee or lessor would exercise that option.
- An event specified in the lease contract that requires an extension or termination of the lease takes place.



## **TOWN OF CULPEPER, VIRGINIA**

### **ACCOUNTING AND OTHER MATTERS (Continued)**

#### **GASB STATEMENT NO. 87 (Continued)**

##### *Short-Term Lease*

A short-term lease is defined as a lease that, at the commencement of the lease term, has a maximum possible term under the lease contract of 12 months (or less), including any options to extend, regardless of their probability of being exercised. Lessees and lessors should recognize short-term lease payments as outflows of resources or inflows of resources, respectively, based on the payment provisions of the lease contract.

##### *Lessee Accounting*

A lessee should recognize a lease liability and a lease asset at the commencement of the lease term, unless the lease is a short-term lease or it transfers ownership of the underlying asset. The lease liability should be measured at the present value of payments expected to be made during the lease term (less any lease incentives). The lease asset should be measured at the amount of the initial measurement of the lease liability, plus any payments made to the lessor at or before the commencement of the lease term and certain direct costs.

A lessee should reduce the lease liability as payments are made and recognize an outflow of resources (for example, expense) for interest on the liability. The lessee should amortize the lease asset in a systematic and rational manner over the shorter of the lease term or the useful life of the underlying asset. The notes to financial statements should include a description of leasing arrangements, the amount of lease assets recognized, and a schedule of future lease payments to be made.

##### *Lessor Accounting*

A lessor should recognize a lease receivable and a deferred inflow of resources at the commencement of the lease term, with certain exceptions for leases of assets held as investments, certain regulated leases, short-term leases, and leases that transfer ownership of the underlying asset. A lessor should not derecognize the asset underlying the lease. The lease receivable should be measured at the present value of lease payments expected to be received during the lease term. The deferred inflow of resources should be measured at the value of the lease receivable plus any payments received at or before the commencement of the lease term that relate to future periods.

A lessor should recognize interest revenue on the lease receivable and an inflow of resources (for example, revenue) from the deferred inflows of resources in a systematic and rational manner over the term of the lease. The notes to financial statements should include a description of leasing arrangements and the total amount of inflows of resources recognized from leases.

## TOWN OF CULPEPER, VIRGINIA

### ACCOUNTING AND OTHER MATTERS (Continued)

#### **GASB STATEMENT NO. 87 (Continued)**

##### *Contracts with Multiple Components and Contract Combinations*

Generally, a government should account for the lease and non-lease components of a lease as separate contracts. If a lease involves multiple underlying assets, lessees and lessors in certain cases should account for each underlying asset as a separate lease contract. To allocate the contract price to different components, lessees and lessors should use contract prices for individual components as long as they do not appear to be unreasonable based on professional judgment, or use professional judgment to determine their best estimate if there are no stated prices or if stated prices appear to be unreasonable. If determining a best estimate is not practicable, multiple components in a lease contract should be accounted for as a single lease unit. Contracts that are entered into at or near the same time with the same counterparty and that meet certain criteria should be considered part of the same lease contract and should be evaluated in accordance with the guidance for contracts with multiple components.

##### *Lease Modifications and Terminations*

An amendment to a lease contract should be considered a lease modification, unless the lessee's right to use the underlying asset decreases, in which case it would be a partial or full lease termination. A lease termination should be accounted for by reducing the carrying values of the lease liability and lease asset by a lessee, or the lease receivable and deferred inflows of resources by the lessor, with any difference being recognized as a gain or loss. A lease modification that does not qualify as a separate lease should be accounted for by re-measuring the lease liability and adjusting the related lease asset by a lessee and re-measuring the lease receivable and adjusting the related deferred inflows of resources by a lessor.

##### *Subleases and Leaseback Transactions*

Subleases should be treated as transactions separate from the original lease. The original lessee that becomes the lessor in a sublease should account for the original lease and the sublease as separate transactions, as a lessee and lessor, respectively.

A transaction qualifies for sale-leaseback accounting only if it includes a sale. Otherwise, it is a borrowing. The sale and lease portions of a transaction should be accounted for as separate sale and lease transactions, except that any difference between the carrying value of the capital asset that was sold and the net proceeds from the sale should be reported as a deferred inflow of resources or a deferred outflow of resources and recognized over the term of the lease.

A lease-leaseback transaction should be accounted for as a net transaction. The gross amounts of each portion of the transaction should be disclosed.

**GASB Statement No. 87** will be effective for the year ending June 30, 2021.

## TOWN OF CULPEPER, VIRGINIA

### ACCOUNTING AND OTHER MATTERS (Continued)

#### CURRENT GASB PROJECTS

GASB currently has a variety of projects in process. Some of these projects are as follows:

- **Conceptual Framework – Recognition.** The project’s objective is to develop recognition criteria for *whether* information should be reported in state and local governmental financial statements and *when* that information should be reported. This project ultimately will lead to a Concepts Statement on recognition of elements of financial statements. The project is currently in deliberations with an exposure draft expected in March 2020, with a final statement in November 2021.
- **Financial Reporting Model.** The objective of this project is to make improvements to the financial reporting model, including Statement No. 34, *Basic Financial Statements – and Management’s Discussion and Analysis – for State and Local Governments*, and other reporting model-related pronouncements (Statements No. 35, *Basic Financial Statements – and Management’s Discussion and Analysis – for Public Colleges and Universities*, No. 37, *Basic Financial Statements – and Management’s Discussion and Analysis – for State and Local Governments: Omnibus*, No. 41, *Budgetary Comparison Schedules – Perspective Differences*, and No. 46, *Net Assets Restricted by Enabling Legislation, and Interpretation No. 6, Recognition and Measurement of Certain Liabilities and Expenditures in Governmental Fund Financial Statements*). The objective of these improvements would be to enhance the effectiveness of the model in providing information that is essential for decision-making and enhance the ability to assess a government’s accounting and address certain application issues, based upon the results of the pre-agenda research on the financial reporting model. The project is currently in deliberations with an exposure draft expected in March 2020, with a final statement in November 2021.
- **Revenue and Expense Recognition.** The objective of this project is to develop a comprehensive application model for the recognition of revenues and expenses that arise from nonexchange, exchange, and exchange-like transactions, including guidance for exchange transactions that has not been specifically addressed in the current literature. The purpose for developing a comprehensive model is (1) to improve the information regarding revenues and expenses that users need to make decisions and assess accountability, (2) to provide guidance regarding exchange and exchange-like transactions that have not been specifically addressed, (3) to evaluate revenue and expense recognition in the context of the conceptual framework, and (4) to address application issues identified in practice, based upon the results of the pre-agenda research on revenue for exchange and exchange-like transactions. The project is currently in deliberations with an exposure draft expected in March 2021, with a final statement in June 2022.
- **Capitalization of Interest Cost.** The objective of this project is to reconsider the accounting and financial reporting standards for capitalization of interest cost, with the goal of enhancing the relevance of capital asset information and potentially simplifying financial reporting. In particular, the guidance will be reviewed in light of the definitions of financial statement elements now established in the GASB’s conceptual framework. This project has been added to the current technical agenda, with a final statement expected in June 2018.

**TOWN OF CULPEPER, VIRGINIA**

**ACCOUNTING AND OTHER MATTERS (Continued)**

**CURRENT GASB PROJECTS (continued)**

- ***Equity Interest Ownership Issues.*** This project will address certain issues related to the reporting of majority equity ownership in legally separate entities. The project will consider improvements to the existing guidance in Statement No. 14, *The Financial Reporting Entity*, on the presentation of ownership interest in a legally separate entity. The project also will consider improvements to the recognition and measurement guidance for wholly-owned legally separate entities that are presented as component units. The project is currently in deliberations with a final statement expected in November 2018.