

June 28, 2016

Honorable Johnson Elimo  
Governor, State of Chuuk  
Federated States of Micronesia

Dear Governor Elimo:

We have performed an audit of the financial statements of the governmental activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the State of Chuuk (the State) as of and for the year ended September 30, 2015, in accordance with auditing standards generally accepted in the United States of America (“generally accepted auditing standards”) and have issued our report thereon dated June 28, 2016.

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 State is responsible.

## **OUR RESPONSIBILITY UNDER GENERALLY ACCEPTED AUDITING STANDARDS AND GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS**

Our responsibility under generally accepted auditing standards and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, has been described in our engagement letter dated October 5, 2015. 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 each opinion unit in the State’s basic financial statements and the accompanying supplementary information, and to disclaim an opinion on the required supplementary information for the year ended September 30, 2015 in conformity with accounting principles generally accepted in the United States of America (“generally accepted accounting principles”), in all material respects;
- To express an opinion on whether the supplementary information that accompanies the basic financial statements is presented fairly, in all material respects, in relation to the basic financial statements taken as a whole;
- To report on the State’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, 2015 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 State's compliance with requirements applicable to each major program and on internal control over compliance in accordance with the *U.S. Office of Management and Budget (OMB) Circular A-133 Compliance Supplement (OMB Circular A-133)*.

Our responsibilities under generally accepted auditing standards include forming and expressing an opinion about whether the financial statements that have been prepared by management with the oversight of the Office of the Governor are presented fairly, in all material respects, in conformity with generally accepted accounting principles. The audit of the financial statements does not relieve management or the Office of the Governor 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 our judgment, including the assessment of the risks of material misstatement of the financial statements, whether caused by fraud or error. In making those risk assessments, we considered internal control over financial reporting relevant to the State's preparation and fair presentation of the financial statements in order to design audit procedures that were appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of the State's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the State'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 State'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 OMB Circular A-133. Our audit does not, however, provide a legal determination of the State's compliance with those requirements.

## **SIGNIFICANT ACCOUNTING POLICIES**

The State's significant accounting policies are set forth in Note 1 to the State's 2015 financial statements. During the year ended September 30, 2015, there were no significant changes in previously adopted accounting policies or their application, except for the following pronouncements adopted by the State:

- GASB *Statement* No. 68, *Accounting and Financial Reporting for Pensions*, which revises and establishes new financial reporting requirements for most governments that provide their employees with pension benefits.
- GASB *Statement* No. 69, *Government Combinations and Disposals of Government Operations*, which improves accounting and financial reporting for state and local governments' combinations and disposals of government operations. Government combinations include mergers, acquisitions, and transfers of operations. A disposal of government operations can occur through a transfer to another government or a sale.
- GASB *Statement* No. 71, *Pension Transition for Contributions Made Subsequent to the Measurement Date - an amendment of GASB Statement No. 68*, which addresses an issue regarding application of the transition provisions of *Statement* No. 68, *Accounting and Financial Reporting for Pensions*. The issue relates to amounts associated with contributions, if any, made by a state or local government employer or nonemployer contributing entity to a defined benefit pension plan after the measurement date of the government's beginning net pension liability.

The implementation of these statements did not have a material effect on the State's 2015 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 requires entities to expand their fair value disclosures by determining major categories of debt and equity securities within the fair value hierarchy on the basis of the nature and risk of the investment. The provisions in *Statement* 72 are effective for fiscal years beginning after June 15, 2015. Management believes that the implementation of this statement only requires additional disclosures to be made about fair value measurements, the level of fair value hierarchy, and valuation techniques and will not have a material effect on the financial statements of the State.

In June 2015, GASB issued Statement 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*, which aligns the reporting requirements for pensions and pension plans not covered in GASB Statements 67 and 68 with the reporting requirements in Statement 68. The provisions in Statement No. 73 are effective for fiscal years beginning after June 15, 2015, with the exception of the provisions that address employers and governmental nonemployer contributing entities for pensions that are not within the scope of Statement 68, which are effective for fiscal years beginning after June 15, 2016. Management does not believe that the implementation of this statement will have a material effect on the financial statements of the State.

In June 2015, GASB issued Statement No. 74, *Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans*, which replaces Statements 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 does not believe that the implementation of this statement will have a material effect on the financial statements of the State.

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. 75 are effective for fiscal years beginning after June 15, 2017. Management does not believe that the implementation of this statement will have a material effect on the financial statements of the State.

In June 2015, GASB issued Statement No. 76, *The Hierarchy of Generally Accepted Accounting Principles for State and Local Governments*, which eliminates two of the four categories of authoritative GAAP that exist under the existing hierarchy prescribed by Statement 55. The two categories that will remain under the new standard are (1) GASB Statements and (2) GASB technical bulletins and implementation guides in addition to AICPA guidance that the GASB clears. The provisions in 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 financial statements of the State.

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 does not believe that the implementation of this statement will have a material effect on the financial statements of the State.

## **ACCOUNTING ESTIMATES**

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's current judgments. Those judgments are ordinarily based on knowledge and experience about past and current events and on assumptions about future events. Significant accounting estimates reflected in the State's 2015 financial statements include management's estimate of the allowance for uncollectible accounts, which is determined based upon past collection experience and aging of the accounts, and management's estimate of depreciation expense, which is based on estimated useful lives of the respective capital assets. During the year ended September 30, 2015, we are not aware of any significant changes in accounting estimates or in management's judgments relating to such estimates.

## **UNCORRECTED MISSTATEMENTS**

Our audit of the financial statements was designed to obtain reasonable, rather than absolute, assurance about whether the financial statements are free of material misstatement, whether caused by error or fraud. We have attached to this letter, as Appendix A to Attachment I, a summary of uncorrected misstatements aggregated by us during the current engagement and pertaining to the latest period presented that were determined by management to be immaterial, both individually and in the aggregate, to the financial statements taken as a whole.

## **MATERIAL CORRECTED MISSTATEMENTS**

Our audit of the financial statements was designed to obtain reasonable, rather than absolute, assurance about whether the financial statements are free of material misstatement, whether caused by error or fraud. Material misstatements were brought to the attention of management as a result of our audit procedures and were corrected by management during the current period. We have attached to this letter, as Attachment II, a summary of misstatements corrected by management.

## **DISAGREEMENTS WITH MANAGEMENT**

We have not had any disagreements with management related to matters that are material to the State's 2015 financial statements.

## **OUR VIEWS ABOUT SIGNIFICANT MATTERS THAT WERE THE SUBJECT OF CONSULTATION WITH OTHER ACCOUNTANTS**

We are not aware of any consultations that management may have had with other accountants about auditing and accounting matters during 2015.

## **SIGNIFICANT FINDINGS OR ISSUES DISCUSSED, OR SUBJECT OF CORRESPONDENCE, WITH MANAGEMENT PRIOR TO OUR RETENTION**

Throughout the year, routine discussions were held, or were the subject of correspondence, with management regarding the application of accounting principles or auditing standards in connection with transactions that have occurred, transactions that are contemplated, or reassessment of current circumstances. In our judgment, such discussions or correspondence were not held in connection with our retention as auditors.

## **SIGNIFICANT DIFFICULTIES ENCOUNTERED IN PERFORMING THE AUDIT**

In our judgment, we received the full cooperation of the State's management and staff and had unrestricted access to the State's senior management in the performance of our audit.

## **MANAGEMENT'S REPRESENTATIONS**

We have made specific inquiries of the State's management about the representations embodied in the financial statements. Additionally, we have requested that management provide to us the written representations the State is required to provide to its independent auditors under generally accepted auditing standards. We have attached to this letter, as Attachment I, a copy of the representation letter we obtained from management.

## MODIFICATIONS TO OUR OPINION

Because of the inadequacy of accounting records, documentary evidence available to us was limited as the State has been unable to identify the propriety of significant unsubstantiated amounts that form part of the governmental activities expenses and the General Fund expenditures stated at \$659,394 for the year ended September 30, 2015. Furthermore, the State has not recorded a liability for land leases and related claims payable in the governmental activities and the General Fund and, accordingly, has not recorded an expenditure/expense for the current period change in that liability. Accounting principles generally accepted in the United States of America require that liabilities incurred attributable to services already rendered and that are not contingent upon a specific event that is outside of the control of the State be accrued as liabilities and expenditures/expenses, which would increase the liabilities, decrease net position, and change the expenses of the governmental activities and increase the liabilities, increase fund deficit, and change the expenditures of the General Fund. The amount by which this departure would affect the liabilities, net position and expenses of the governmental activities and the liabilities, fund deficit, and expenditures of the General Fund is not reasonably determinable. Our opinion is modified with respect to these matters and the proposed wording of the modification follows:

“In our opinion, except for the matters described in the “Basis for Qualified Opinions on Governmental Activities and General Fund” paragraph, the financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities and the General Fund of the State of Chuuk as of September 30, 2015, and the respective changes in financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.”

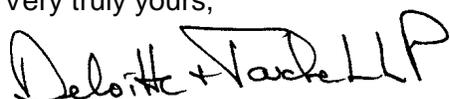
## CONTROL-RELATED MATTERS

We have issued a separate report to you, also dated June 28, 2016, concerning certain matters involving the State’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 on the audit performed in accordance with *Government Auditing Standards*. We have also issued a separate report to you, also dated June 28, 2016, concerning the State’s compliance with requirements applicable to each major program and on internal control over compliance in accordance with OMB Circular A-133. Although we have included management’s written response to our findings, 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.

\* \* \* \* \*

This report is intended solely for the information and use of management, the Office of the Governor, and others within the organization and is not intended to be and should not be used by anyone other than these specified parties.

Very truly yours,

Handwritten signature of Deloitte + Touche LLP in black ink.



DEPARTMENT OF ADMINISTRATIVE SERVICES  
DIVISION OF TREASURY  
CHUUK STATE  
FEDERATED STATES OF MICRONESIA

Director Jesse Mori  
Deputy Director Jonas Paul

June 28, 2016

Deloitte & Touche LLP  
361 South Marine Corps Drive  
Tamuning GU 96913

We are providing this letter in connection with your audit of the financial statements of the governmental activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the State of Chuuk (the "Government"), as of and for the year ended September 30, 2015, which collectively comprise the Government's basic financial statements for the purpose of expressing an opinion as to whether the basic financial statements present fairly, in all material respects, the financial position, results of operations or changes in fund balances of the Government in conformity with accounting principles generally accepted in the United States of America (GAAP).

We confirm that we are responsible for the following:

- a. The preparation and fair presentation in the basic financial statements of financial position of the governmental activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information, in conformity with GAAP.
- b. 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
  - To prevent and detect fraud.
- c. Establishing and maintaining effective internal control over financial reporting.
- d. The review and approval of the financial statements and related notes and acknowledge your role in the preparation of this information. Specifically, we acknowledge that your role in the preparation of the financial statements was a matter of convenience rather than one of necessity. We have reviewed the financial statement preparation assistance provided by you and acknowledge that the financial statements are prepared in accordance with GAAP. Our review was based on the use of the financial statement disclosure checklist for general purpose financial statements obtained from the Government Finance Officers Association.

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.

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

1. The basic financial statements referred to above are fairly presented in conformity with GAAP. In addition:
  - a. The financial statements include all component units as well as joint ventures with an equity interest, and properly disclose all other joint ventures and other related organizations except for the Chuuk State Coconut Authority and the Chuuk Public Fisheries Corporation. The omission of these component units is not considered material to the aggregate discretely presented component unit reporting unit. In addition, the Government has omitted certain Development Authorities, the Chuuk Visitors Bureau Fund, the Representation Fund, the Chuuk State Legislature Fund, the Legislature Emergency Fund, the Chuuk State Travel Fund, the Association of Pacific Island Legislatures Fund, the Municipal Operations and Projects Fund, the Fire Disaster Relief Fund, the Economic Development Loan Fund, the Chuuk Farmers', Fishermen's, and Handicrafts Fair Fund, and the Chuuk State Local Farmers Revolving Fund. These funds do not report any financial activity and, accordingly, the omission of these funds is not considered material to either the aggregate remaining fund information or the governmental activities reporting units.
  - b. Net position components (net investment in capital assets; restricted; and unrestricted) are properly classified and, if applicable, approved.
  - c. Deposits and investment securities are properly classified in the category of custodial credit risk.
  - d. Capital assets, including infrastructure assets, are properly capitalized, reported, and, if applicable, depreciated.
  - e. Required supplementary information is measured and presented within prescribed guidelines.
  - f. Applicable laws and regulations are followed in adopting, approving, and amending budgets.
  - g. The financial statements properly classify all funds and activities, including special and extraordinary items.
  - h. All funds that meet the quantitative criteria in the GASB Codification of Government Accounting and Financial Reporting Standards ("GASB Codification") Section 2200.159 for presentation as major are identified and presented as such and all other funds that are presented as major are particularly important to financial statement users.
  - i. Expenses have been appropriately classified in or allocated to functions and programs in the statement of activities, and allocations have been made on a reasonable basis.

- j. Revenues are appropriately classified in the statement of activities within program revenues, general revenues, contributions to term or permanent endowments, or contributions to permanent fund principal.
  - k. The Government's policy regarding whether to first apply restricted or unrestricted resources when an expense is incurred for purposes for which both restricted and unrestricted net position is available and appropriately disclosed and that net position is properly recognized under the policy.
  - l. The Government GASB Codification of Governmental Accounting and Financial Reporting Standards ("GASB Codification") Section 1800.178 regarding which resources (restricted, committed, assigned, or unassigned) are considered to be spent for expenditures to determine the fund balance classifications for financial reporting purposes.
  - m. Interfund, internal, and intra-Government activity and balances have been appropriately classified and reported.
  - n. Fund balance restrictions, commitments, and assignments are properly classified and, if applicable, approved.
2. The Government has provided to you all relevant information and access as agreed in the terms of the audit engagement letter.
  3. The Government has made available to you:
    - a. Financial records and related data for all financial transactions of the Government and for all funds administered by the Government. The records, books, and accounts, as provided to you, record the financial and fiscal operations of all funds administered by the Government and provide the audit trail to be used in a review of accountability. Information presented in financial reports is supported by the books and records from which the financial statements have been prepared.
    - b. Contracts and grant agreements (including amendments, if any) and any other correspondence that has taken place with federal agencies.
  4. There has been no:
    - a. Action taken by Government management that contravenes the provisions of federal laws, Federated States of Micronesia laws, or State laws, and laws and regulations, or of contracts and grants applicable to the Government.
    - b. Communication from other regulatory agencies concerning noncompliance with or deficiencies in financial reporting practices or other matters that could have a material effect on the financial statements, which have been provided to you.
  5. We believe the effects of any uncorrected financial statement misstatements aggregated by you during the current audit engagement and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the financial statements taken as a whole. A summary of such uncorrected misstatements has been attached as Appendix A.

6. The Government has not performed a formal risk assessment, including the assessment of the risk that the financial statements may be materially misstated as a result of fraud. However, management has made available to you their understanding about the risks of fraud in the Government and do not believe that the financial statements are materially misstated as a result of fraud.
7. We have no knowledge of any fraud or suspected fraud affecting the Government involving:
  - a. Management.
  - b. Employees who have significant roles in internal control over financial reporting.
  - c. Others, when the fraud could have a material effect on the financial statements.
8. We have no knowledge of any allegations of fraud or suspected fraud affecting the Government's financial statements communicated by employees, former employees, analysts, regulators, or others.
9. There are no unasserted claims or assessments that legal counsel has advised us are probable of assertion and must be disclosed in accordance with GASB Codification Section C50, *Claims and Judgments*, except as disclosed in Note 11 to the financial statements.
10. Significant assumptions used by us in making accounting estimates are reasonable.
11. We are responsible for the preparation of the Schedule of Expenditures of Federal Awards in accordance with the requirements of OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations* ("OMB Circular A-133"). We have identified and disclosed all of the Entity's government programs and related activities subject to the OMB Circular A-133 compliance audit. In addition, we have accurately completed the appropriate sections of the data collection form.
12. We are responsible for compliance with local, state, and federal laws, rules, and regulations, including compliance with the requirements of OMB Circular A-133, and provisions of grants and contracts relating to the Government's operations. We are responsible for establishing and maintaining the components of internal control relating to our activities in order to achieve the objectives of providing reliable financial reports, effective and efficient operations, and compliance with laws and regulations. The Government is responsible for maintaining accounting and administrative control over revenues, obligations, expenditures, assets, and liabilities.
13. 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 federal awards in compliance with laws, regulations, and provisions of contracts or grant agreements that could have a material effect on its federal programs.

14. We have disclosed to you all deficiencies in the design or operation of internal control over financial reporting identified as part of our evaluation, including separately disclosing to you all such deficiencies that are significant deficiencies or material weaknesses in internal control over financial reporting.
15. No events have occurred subsequent to September 30, 2015 that require consideration as adjustments to or disclosures in the schedule of federal awards and related notes or that existed at the end of the reporting period that affect noncompliance during the reporting period.
16. We have disclosed all known noncompliance with direct and material compliance requirements occurring subsequent to September 30, 2015.
17. There have been no changes in internal control over compliance or other factors that might significantly affect internal control, including any corrective action taken by the Government with regard to significant deficiencies and material weaknesses in internal control over compliance, subsequent to September 30, 2015.
18. Federal awards expenditures have been charged in accordance with applicable cost principles.
19. The Reporting Package submitted to the Federal Audit Clearinghouse (FAC) as defined by the Uniform Grant Guidance section 2CFR200.512(3)(c) does not contain protected personally identifiable information.
20. We have disclosed all contracts or other agreements with service organizations.
21. We have disclosed to you all communications from service organizations relating to noncompliance with the requirements of federal statutes, regulations, and terms and conditions of federal awards at those organizations.
22. We have:
  - a. Identified and disclosed to you the requirements of laws, regulations, and the provisions of contracts and grant agreements that are considered to have a direct and material effect on each federal program under audit.
  - b. Complied, in all material respects, with the requirements identified above in connection with federal awards.
  - c. Identified and disclosed interpretations of any compliance requirements that have varying interpretations.
  - d. Made available all information related to federal financial reports and claims for advances and reimbursements. Federal financial reports and claims for advances and reimbursements are supported by the books and records from which the financial statements have been prepared and are prepared on a basis consistent with that presented in the Schedule of Expenditures of Federal Awards. The copies of federal program financial reports provided are true copies of the reports submitted, or electronically transmitted, to the federal agency or pass-through entity, as applicable.

- e. Identified and disclosed all amounts questioned and any known noncompliance with the requirements of federal awards, including the results of other audits or program reviews related to the objectives of the audit.
  - f. Identified previous financial audits, attestation engagements, performance audits, or other studies related to the objectives of the audit and the corrective actions taken to address significant findings and recommendations, including the status of follow-up on prior audit findings (and information about all management decisions) by federal awarding agencies and pass-through entities.
  - g. Provided to you our views on the reported findings, conclusions, and recommendations for your report.
  - h. Monitored subrecipients to determine that they have expended pass-through assistance in accordance with applicable laws and regulations and have met the requirements of Circular A-133.
  - i. Taken appropriate corrective action on a timely basis after receipt of a subrecipient's auditor's report that identifies noncompliance with laws, regulations, or the provisions of contracts or grant agreements.
  - j. Considered the results of the subrecipient's audits and made any necessary adjustments to the auditee's own books and records.
23. We are responsible for follow-up on all prior-year(s) findings. We have prepared a summary schedule of prior-year findings reporting the status of our efforts in implementation of the prior-year's corrective action plan. The summary schedule of prior audit findings includes all findings required to be included in accordance with OMB Circular A-133.
24. We are responsible for taking corrective action plan on audit findings and have developed a corrective action plan that meets the requirements of OMB Circular A-133. We have included in the corrective action plan for current-year findings, the name of the person in our organization responsible for implementation of the actions, the best actions to be taken, and the estimate of a completion date. We have taken timely and appropriate steps to remedy fraud, illegal acts, violations of provisions of contracts or grant agreements, or abuse that you report.
25. Management has identified and disclosed to you all laws and regulations that have a direct and material effect on the determination of financial statement amounts.
26. We have adopted the provisions of GASB Codification Section 2100, *Defining the Financial Reporting Government*. We believe that we have properly identified and reported as a component unit of the Government each organization that meets the criteria established in GASB Codification Section 2100, *Defining the Financial Reporting Government*.

27. Note 11 to the financial statements discloses all of the facts (i.e., significant conditions and events and management plans) of which we are aware that are relevant to the Government's ability to continue as a going concern. The Government has entered into a memorandum of agreement (MOA) with the FSM National Government to outline reform measures to address the Government's current General Fund deficit position. Management believes that the actions outlined in the MOA will provide the Government the opportunity to continue the process of reducing the General Fund deficit position.

Except where otherwise stated below, matters less than \$214,000 collectively for the governmental activities, \$49,000 collectively for the General Fund, \$165,000 collectively for the Foreign Assistance Grants Fund, \$112,000 collectively for the Compact Trust Fund, and \$1,100 collectively for the aggregate remaining fund information are not considered to be exceptions that require disclosure for the purpose of the following representations. These amounts are not necessarily indicative of amounts that would require adjustment to, or disclosure in, the basic financial statements.

28. Except as listed in Appendix A, there are no transactions that have not been recorded and reflected in the financial statements.
29. The Government has no plans or intentions that may affect the carrying value or classification of assets and liabilities.
30. Regarding related parties:
- a. We have disclosed to you the identity of the Government's related parties and all the related party relationships and transactions of which we are aware.
  - b. To the extent applicable, related parties and all related-party relationships and transactions, including sales, purchases, loans, transfers, leasing arrangements, and guarantees (written or oral) have been appropriately identified, properly accounted for, and disclosed in the financial statements.
31. In preparing the financial statements in conformity with GAAP, management uses estimates. All estimates have been disclosed in the financial statements for which known information available prior to the issuance of the financial statements indicates that both of the following criteria are met:
- a. It is reasonably possible that the estimate of the effect on the financial statements of a condition, situation, or set of circumstances that existed at the date of the financial statements will change in the near term due to one or more future confirming events.
  - b. The effect of the change would be material to the financial statements.
32. Risks associated with concentrations, based on information known to management, that meet all of the following criteria have been disclosed in the financial statements:
- a. The concentration exists at the date of the financial statements.
  - b. The concentration makes the Government vulnerable to the risk of a near-term severe impact.

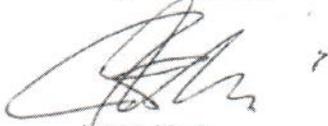
- c. It is at least reasonably possible that the events that could cause the severe impact will occur in the near term.
33. There are no:
  - a. Instances of identified or suspected noncompliance with laws and regulations whose effects should be considered when preparing the financial statements.
  - b. Known actual or possible litigation and claims whose effects should be considered when preparing the financial statements that have not been disclosed to you and accounted for and disclosed in accordance with GAAP.
  - c. Other liabilities or gain or loss contingencies that are required to be accrued or disclosed by GASB Codification Section C50, *Claims and Judgments*, except as discussed in Note 11 to the financial statements.
34. The Government 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 except as discussed in Notes 1K and 7 to the financial statements.
35. The Government has complied with aspects of contractual agreements that may affect the financial statements.
36. No department or agency of the Government has reported a material instance of noncompliance to us.
37. The Government has identified all derivative instruments as defined by GASB Codification Section D40, *Derivative Instruments*, and appropriately recorded and disclosed such derivatives in accordance with GASB Codification Section D40.
38. No events have occurred after September 30, 2015, but before June 28, 2016, the date the financial statements were issued that requires consideration as adjustments to or disclosures in the financial statements.
39. Regarding required supplementary information:
  - a. We confirm that we are responsible for the required supplementary information.
  - b. The required supplementary information is measured and presented in accordance with GASB Codification Section 2200, *Comprehensive Annual Financial Report*.
  - c. The methods of measurement and presentation of the supplementary information have not changed from those used in the prior period.
40. Regarding supplementary information:
  - a. We are responsible for the preparation and fair presentation of the supplementary information in accordance with GASB Codification Section 2200, *Comprehensive Annual Financial Report*.

- b. We believe the supplementary information, including its form and content, is fairly presented in accordance with GASB Codification Section 2200, *Comprehensive Annual Financial Report*.
  - c. The methods of measurement and presentation of the supplementary information have not changed from those used in the prior period.
41. Receivables recorded in the financial statements represent valid claims against debtors for sales or other charges arising on or before the balance-sheet date and have been appropriately reduced to their estimated net realizable value.
42. During the year ended September 30, 2015, the Government implemented the following pronouncements:
  - GASB Statement No. 68, *Accounting and Financial Reporting for Pensions*, and GASB Statement No. 71, *Pension Transition for Contributions Made Subsequent to the Measurement Date - an amendment of GASB Statement No. 68*, which revise and establish new financial reporting requirements for most governments that provide their employees with pension benefits. The implementation of these statements did not have a material effect on the financial statements of the Government.
  - GASB Statement No. 69, *Government Combinations and Disposals of Government Operations*, which improves accounting and financial reporting for state and local governments' combinations and disposals of government operations. Government combinations include mergers, acquisitions, and transfers of operations. A disposal of government operations can occur through a transfer to another government or a sale. The implementation of this statement did not have a material effect on the financial statements of the Government.
43. 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 requires entities to expand their fair value disclosures by determining major categories of debt and equity securities within the fair value hierarchy on the basis of the nature and risk of the investment. The provisions in Statement 72 are effective for fiscal years beginning after June 15, 2015. Management believes that the implementation of this statement only requires additional disclosures to be made about fair value measurements, the level of fair value hierarchy, and valuation techniques and will not have a material effect on the financial statements of the Government.
44. In June 2015, GASB issued Statement 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*, which aligns the reporting requirements for pensions and pension plans not covered in GASB Statements 67 and 68 with the reporting requirements in Statement 68. The provisions in Statement No. 73 are effective for fiscal years beginning after June 15, 2015, with the exception of the provisions that address employers and governmental nonemployer contributing entities for pensions that are not within the scope of Statement 68, which are effective for fiscal years beginning after June 15, 2016. Management does not believe that the implementation of this statement will have a material effect on the financial statements of the Government.

45. In June 2015, GASB issued Statement No. 74, *Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans*, which replaces Statements 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 does not believe that the implementation of this statement will have a material effect on the financial statements of the Government.
46. 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. 75 are effective for fiscal years beginning after June 15, 2017. Management does not believe that the implementation of this statement will have a material effect on the financial statements of the Government.
47. In June 2015, GASB issued Statement No. 76, *The Hierarchy of Generally Accepted Accounting Principles for State and Local Governments*, which eliminates two of the four categories of authoritative GAAP that exist under the existing hierarchy prescribed by Statement 55. The two categories that will remain under the new standard are (1) GASB Statements and (2) GASB technical bulletins and implementation guides in addition to AICPA guidance that the GASB clears. The provisions in 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 financial statements of the Government.\
48. 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 does not believe that the implementation of this statement will have a material effect on the financial statements of the Government.
49. The Government is exposed to various risks of loss related to torts; theft of damage to, and destruction of assets; errors and omissions; injuries to employees; and natural disasters. It is the policy of the primary government not to purchase commercial insurance for the risks of loss to which it is exposed. Instead, the Government management believes it is more economical to manage its risks internally. In the event of claim settlements and judgments, the Government reports all of its risk management activities in its General Fund. Claims expenditures and liabilities are reported when it is probable that a loss has occurred and the amount of that loss can be reasonably estimated. These losses include an estimate of claims that have been incurred but not reported. No losses have occurred as a result of these risks in any of the past three fiscal years.

50. Management of the Government believes that it is in compliance with all significant limitations and restrictions of Asian Development Bank loan covenants as of September 30, 2015.
51. We have appropriately identified and properly recorded and disclosed in the financial statements, where applicable, all interfund transactions, including repayment terms.
52. No evidence of fraud, possible irregularities, or dishonesty in fiscal operations of federal programs administered by the Government has been discovered.

Very truly yours,



Jesse Mori  
Director, Department of Administrative Services

State of Chuuk  
 General Fund  
 Appendix A  
 Summary of Uncorrected Misstatements  
 September 30, 2015

	Assets		Liabilities		Equity		Income	
	Dr.	(Cr.)	Dr.	(Cr.)	Dr.	(Cr.)	Dr.	(Cr.)
To correct overstatement of FSMNG receivable		(68,765)					68,765	
To correct overstatement of allowance for bad debts	114,286							(114,286)
To correct overstatement of payroll liabilities			53,925					(53,925)
To correct overstatement of FSMNG receivable		(21,995)					21,995	
	114,286	(90,760)	53,925				90,760	(168,211)

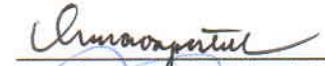


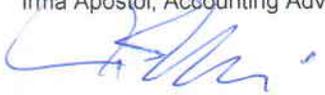
State of Chuuk  
 Other Governmental Funds  
 Appendix A  
 Summary of Uncorrected Misstatements  
 September 30, 2015

	Assets		Liabilities		Equity		Income	
	Dr.	(Cr.)	Dr.	(Cr.)	Dr.	(Cr.)	Dr.	(Cr.)
To correct understatement of allowance for bad debts		(1,510)						1,510

	1 AJE		
61-1820-00-00-00000-00	AR Housing Loans	622,778.00	
61-1821-00-00-00000-00	Allow for Doubt- AR Hsing Loan	-	622,778.00
		622,778.00	622,778.00
	To adjust general ledger to equal subledger as of 9/30/15		

**Concurrence:** I have reviewed the adjustments above and authorize that they be recorded in the general ledger as of September 30, 2015. The adjustments are results of errors and not results of fraud or illegal acts.

  
\_\_\_\_\_  
Irma Apostol, Accounting Advisor

  
\_\_\_\_\_  
Jesse Mori, Director of Administrative Services

**ATTACHMENT II, CONTINUED**

**Chuuk State Government  
Corrected Misstatements  
September 30, 2015**

<u>Fund-Acct</u>	<u>Name</u>	<u>Debit</u>	<u>Credit</u>
	1 AJE		
1-1999-00-00-00000-99	Due to Treasury Fund	-	533,209.08
1-4110-00-00-00000-00	Fund Balance Surplus	448,108.25	-
1-7999-10-29-01095-00	Other Miscellaneous Revenue	85,100.83	-
		533,209.08	533,209.08
	To correct opening fund balance to reflected FY14 audited balance		
	2 AJE		
1-1115-00-00-00000-00	Investment-Early Rtrmt Trust	-	230,218.61
1-8720-10-29-01095-00	Loan Principal Payment	393,484.26	-
1-7810-10-29-01095-00	Interest Income	-	163,265.65
		393,484.26	393,484.26
	To GL to equal investment confirmation received from FSM National		
	3 AJE		
1-8910-95-95-09195-00	Transfer Out	-	200,000.00
1-7910-04-11-00459-00	TRANSFER IN MAYSAK	200,000.00	-
		200,000.00	200,000.00
	To correct erroneous entry regarding transfer out from GF to IMF		
	4 AJE		
1-8815-10-29-01095-00	One Time Adjustments	74,935.00	-
1-8910-95-95-09195-00	Transfer Out	-	74,935.00
		74,935.00	74,935.00
	To adjust fund transfer out from GF to IMF to reflect Governor's decree.		
	5 AJE		
1-1999-00-00-00000-99	Due to Treasury Fund	337,720.76	-
99-1999-00-00-00000-10	Due to Cmpt II Ed Fund	-	39,275.33
99-1999-00-00-00000-11	Due to Cmpt II Hlth Fund	-	67,132.36
99-1999-00-00-00000-12	Due to Cmpt II Environ Fund	-	25,421.14
99-1999-00-00-00000-13	Due to Cmpt II Priv Sctr Fund	-	41,729.92
99-1999-00-00-00000-14	Due to Cmpt II Pblc Cpcty Fund	-	1,654.76
99-1999-00-00-00000-15	Due to Cmpt II SEG Fund	183,158.38	-
99-1999-00-00-00000-20	Due to US Grants thru FSM Fund	-	25.00
99-1999-00-00-00000-01	Due to General Fund	-	337,720.76
99-1999-00-00-00000-18	Due to Cmpt II Infrstrct Maint	338,963.00	-
99-1999-00-00-00000-16	Due to ERA Fund	-	9,162.11
1-7110-10-21-01010-00	Federal Grants	-	337,720.76
		859,842.14	859,842.14
	To correct opening fund balance in Grant Assistance.		

**ATTACHMENT II, CONTINUED**

	3 AJE		
13-1420-00-00-00000-00	A/R Compact	-	144,919.42
12-1420-00-00-00000-00	A/R Compact	-	61,682.30
14-1420-00-00-00000-00	A/R Compact	-	322,837.93
15-1420-00-00-00000-00	A/R Compact	-	903,034.74
10-1420-00-00-00000-00	A/R Compact	-	1,127,104.57
11-1420-00-00-00000-00	A/R Compact	-	939,549.48
10-7050-10-29-10000-14	Compact II Revenues	1,127,104.57	-
11-7050-10-29-11000-14	Compact II Revenues	939,549.48	-
12-7050-10-29-12000-14	Compact II Revenues	61,682.30	-
13-7050-10-29-13000-14	Compact II Revenues	144,919.42	-
14-7050-10-29-14000-14	Compact II Revenues	322,837.93	-
15-7050-10-29-15000-13	Compact II Revenues	903,034.74	-
16-1420-00-00-00000-00	A/R Compact	-	47,279.10
16-7050-10-29-16000-14	Compact II Revenues	47,279.10	-
27-1420-00-00-00000-00	A/R Compact	455,499.76	-
28-1420-00-00-00000-00	A/R Compact	-	133,890.07
27-7050-10-29-10000-14	Compact revenue	-	455,499.76
28-7050-10-29-11100-14	Compact revenue	133,890.07	-
24-7050-10-29-24000-15	Compact II Revenues	25,686.47	-
24-1420-00-00-00000-00	A/R Compact	-	25,686.47
		4,161,483.84	4,161,483.84
	To adjust sector revenue to equal expenditure incurred		

	4 AJE		
20-1410-00-00-00000-00	A/R Natl FG	18,631.98	-
20-7110-10-29-10950-00	Federal Grants Adjustment	-	18,631.98
21-7120-31-47-13201-00	US AID FOR AGRICULTURE	-	1,631.10
21-1411-00-00-00000-00	AR direct from grantor	1,631.10	-
		20,263.08	20,263.08
	To adjust federal grants revenue to equal expenditure incurred.		

	5 AJE		
25-1410-00-00-00000-00	A/R Natl FG	28,820.44	-
25-7210-20-35-40050-11	CFSM Grants	-	28,820.44
		28,820.44	28,820.44
	To adjust CFSM revenue to equal expenditure		

	1 AJE		
89-7820	Compact Investment	584,472.37	-
89-1110-00-00-00000-00	Marketable Securities	-	584,472.37
		584,472.37	584,472.37
	To adjust GL balance to equal confirmation from National Government		

	1 AJE		
93-2910-00-00-00000-00	Amt to be Provided	-	2,067,879.91
93-3810-00-00-00000-00	ADB Loans 1873 and 1874 (PSDP)	297,037.62	-
93-3811-00-00-00000-00	ADB Loan 1816 (BSSP) Payable	365,712.18	-
93-3830-00-00-00000-00	LTD Retirement ADB loan 1520	796,308.12	-
93-3812-00-00-00000-00	ADB Loans 1459 (Water Supply)	608,821.99	-
		2,067,879.91	2,067,879.91
	To adjust ADB loans to equal amount confirmed by National Government		

**ATTACHMENT II, CONTINUED**

	6 AJE		
99-1999-00-00-00000-10	Due to Cmpt II Ed Fund	39,275.92	-
99-1999-00-00-00000-11	Due to Cmpt II Hlth Fund	101,054.52	-
99-1999-00-00-00000-12	Due to Cmpt II Environ Fund	3,448.19	-
99-1999-00-00-00000-13	Due to Cmpt II Priv Sctr Fund	25,275.69	-
99-1999-00-00-00000-14	Due to Cmpt II Pblc Cpcty Fund	129.35	-
99-1999-00-00-00000-15	Due to Cmpt II SEG Fund	-	332,741.56
99-1999-00-00-00000-20	Due to US Grants thru FSM Fund	-	202,173.51
99-1999-00-00-00000-23	Due to Non-US Grants Fund	1.66	-
99-1999-00-00-00000-25	Due to CFSM Grants Fund	-	13,010.93
99-1999-00-00-00000-01	Due to General Fund	533,209.08	-
99-1999-00-00-00000-01	Due to General Fund	313,329.17	-
99-1999-00-00-00000-18	Due to Cmpt II Infrstrct Maint	-	338,962.35
99-1999-00-00-00000-61	Due to CHA Fund	75,450.32	-
99-1999-00-00-00000-97	Due to RM Fund	-	202,662.61
99-1999-00-00-00000-16	Due to ERA Fund	-	1,622.94
		1,091,173.90	1,091,173.90
	To correct interfund		
	1 AJE		
10-1999-00-00-00000-99	Due to Treasury Fund	39,275.33	-
10-4110-00-00-00000-00	Fund Balance Surplus	-	0.63
11-1999-00-00-00000-99	Due to Treasury Fund	67,132.36	-
11-4110-00-00-00000-00	Fund Balance Surplus	-	67,132.36
12-1999-00-00-00000-99	Due to Treasury Fund	25,421.14	-
12-4110-00-00-00000-00	Fund Balance Surplus	-	25,421.14
13-1999-00-00-00000-99	Due to Treasury Fund	41,729.92	-
13-4110-00-00-00000-00	Fund Balance Surplus	-	7,183.16
14-1999-00-00-00000-99	Due to Treasury Fund	1,654.76	-
14-4110-00-00-00000-00	Fund Balance Surplus	-	-
15-1999-00-00-00000-99	Due to Treasury Fund	-	183,158.38
15-4110-00-00-00000-00	Fund Balance Surplus	183,158.38	-
20-1999-00-00-00000-99	Due to Treasury Fund	25.00	-
20-4110-00-00-00000-00	Fund Balance Surplus	-	25.00
13-4270-00-00-00000-00	Reserve for Enc	68.89	-
18-1999-00-00-00000-99	Due to Treasury Fund	-	338,963.00
16-1999-00-00-00000-99	Due to Treasury Fund	9,162.11	-
16-4110-00-00-00000-00	Fund Balance Surplus	-	4,431.10
10-4111-00-00-00000-00	Reserve for Commitments	-	39,274.70
13-4111-00-00-00000-00	Reserve for Commitments	-	34,615.65
14-4111-00-00-00000-00	Reserve for Commitments	-	1,654.76
16-4111-00-00-00000-00	Reserve for Commitments	-	4,731.01
18-4111-00-00-00000-00	Reserve for Commitments	338,963.00	-
		706,590.89	706,590.89
	To correct opening fund balance to equal 2014 audited balance		