OFFICE OF THE NEW YORK STATE COMPTROLLER



DIVISION OF LOCAL GOVERNMENT & School Accountability

Village of Franklinville Police Payroll and Water Accountability

Report of Examination

Period Covered:

June 1, 2012 — July 16, 2014 2014M-262

Thomas P. DiNapoli

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Division of Local Government and School Accountability

March 2015

Dear Village Officials:

A top priority of the Office of the State Comptroller is to help local government officials manage government resources efficiently and effectively and, by so doing, provide accountability for tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of local governments statewide, as well as compliance with relevant statutes and observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations and Village Board governance. Audits also can identify strategies to reduce costs and to strengthen controls intended to safeguard local government assets.

Following is a report of our audit of the Village of Franklinville, entitled Police Payroll and Water Accountability. This audit was conducted pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law.

This audit's results and recommendations are resources for local government officials to use in effectively managing operations and in meeting the expectations of their constituents. If you have questions about this report, please feel free to contact the local regional office for your county, as listed at the end of this report.

Respectfully submitted,

Office of the State Comptroller Division of Local Government and School Accountability



State of New York Office of the State Comptroller EXECUTIVE SUMMARY

The Village of Franklinville (Village) is located in the Town of Franklinville in eastern Cattaraugus County and has a population of approximately 1,740. The Village is governed by an elected Board of Trustees (Board) comprising a Mayor and four Trustees. The Board is responsible for the general management and control of the Village's financial affairs. The Mayor is the Village's chief executive officer and the Clerk-Treasurer is the chief fiscal officer.

The Village Police Department (Department) employs two full-time and nine part-time police officers. The Department is supervised by the full-time Police Chief (Chief), who reports to the Mayor. The Department's budgeted payroll appropriations for the 2014-15 fiscal year are approximately \$179,000.

The Village produces its own water from two wells and provides water services to 769 residential and commercial accounts. The Superintendent of Public Works oversees water operations. Budgeted appropriations for the water system for the 2014-15 fiscal year are approximately \$255,000.

Scope and Objectives

The objectives of our audit were to review the Village's police payroll and water operations for the period June 1, 2012 through July 16, 2014. Our audit addressed the following related questions:

- Are Village police payroll payments based on sufficiently documented hours worked and Board-approved rates?
- Do Village officials consistently monitor the amount of water produced in comparison to the amount of water sold to control unaccounted-for water?

Audit Results

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Department payroll payments were not adequately supported and leave time was not properly accrued or used. We found that, of the \$276,000 paid to police officers during our audit period, \$6,084 of overtime paid to the Chief and the full-time patrolman was not adequately supported by appropriate time sheets. We compared time sheets to other required, supporting time records, such as the police blotter and County dispatch records, and found discrepancies between all of these sources. We further found that the Board and Mayor did not monitor or review the Chief's compensatory time. Instead, the Board allowed the Chief to record unsupported compensatory time as accrued and used for himself. We also found that the full-time patrolman accrued sick leave in excess of the amount authorized. As a result of inadequate monitoring of the accrual and usage of leave time, the two full-time officers were improperly credited with leave time valued at more than \$12,000.

Village officials did not adequately monitor or develop a plan to address the causes for the difference in water produced by the Village's water system to the amount billed to customers. The Village produced more than 346 million gallons of water of which 92 million gallons of water was billed to customers, resulting in unaccounted-for water of 254 million gallons (73 percent). For perspective, this amount of water loss would cover more than one square mile with one foot of water.¹ The Village could have saved approximately \$66,000 during our audit period if it did not need to produce the 254 million gallons of water.

Comments of Village Officials

The results of our audit and recommendations have been discussed with Village officials, and their comments, which appear in Appendix A, have been considered in preparing this report. Village officials generally agreed with our recommendations and indicated they would be taking corrective action. Appendix B includes our comment on an issue raised in the Village's response.

¹ Environmental Protection Agency publication reference # 810-F-95-001, dated 1995

Introduction		
Background	The Village of Franklinville (Village) is located in the Town of Franklinville in eastern Cattaraugus County (County) and has a population of 1,740. The Village is governed by an elected Board of Trustees (Board) comprising a Mayor and four Trustees. The Board is responsible for the general management and control of the Village's financial affairs. The Mayor is the Village's chief executive officer and the Clerk-Treasurer is the chief fiscal officer.	
	The Village provides various services to residents, including police protection, water, sewer, garbage disposal, street maintenance and improvements and general government support. The Village's budgeted appropriations for the 2014-15 fiscal year are \$707,870, funded primarily with real property taxes, sales tax and user charges.	
	The Village Police Department (Department) employs two full-time and nine part-time police officers. The Department is supervised by the full-time Police Chief (Chief), who reports to the Mayor. The Department's budgeted payroll appropriations for the 2014-15 fiscal year are approximately \$179,000.	
	The Village produces its own water from two wells and provides water services to 769 residential and commercial accounts. The Superintendent of Public Works (SPW) oversees water operations, while the Assistant Wastewater Treatment Plant Operator is responsible for reading the two master meters on a daily basis. Employees of the Department of Public Works manually read residential and commercial meters on a quarterly basis. The Clerk- Treasurer enters the readings into the billing software and generates the quarterly billing. Budgeted appropriations for the water system for the 2014-15 fiscal year are approximately \$255,000.	
Objectives	The objectives of our audit were to review the Village's police payroll and water operations. Our audit addressed the following related questions:	
	• Are Village police payroll payments based on sufficiently documented hours worked and Board-approved rates?	
	• Do Village officials consistently monitor the amount of water produced in comparison to the amount of water sold to control unaccounted-for water?	

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Scope and Methodology

Comments of Village Officials and Corrective Action We examined the Village's records and reports for police payroll and water operations for the period June 1, 2012 through July 16, 2014.

We conducted our audit in accordance with generally accepted government auditing standards (GAGAS). More information on such standards and the methodology used in performing this audit is included in Appendix C of this report.

The results of our audit and recommendations have been discussed with Village officials, and their comments, which appear in Appendix A, have been considered in preparing this report. Village officials generally agreed with our recommendations and indicated they would be taking corrective action. Appendix B includes our comment on an issue raised in the Village's response.

The Board has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report should be prepared and forwarded to our office within 90 days, pursuant to Section 35 of the General Municipal Law (GML). For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. We encourage the Village to make this plan available for public review in the Clerk-Treasurer's office.

Police Payroll

Salaries and wages, including overtime, comprise a significant portion of the Village's budget. To properly control and account for these costs, Village officials should ensure that time worked and leave time earned is properly approved, documented, monitored and controlled, so employees are only paid amounts to which they are entitled as authorized by the Board. An important component of accounting for employees' time worked is maintaining records that accurately capture the time employees report to work, the time employees' shifts end and when leave time is accrued and used. Each employee's time record should be signed by the employee and reviewed and signed by the employee's supervisor. Further, leave time should only be used and overtime should only be paid in accordance with Board policies.

Department payroll payments were not adequately supported and leave time was not properly accrued or used. We found that, of the \$276,000 paid to police officers during our audit period, \$6,084 of overtime paid to the Chief and the full-time patrolman was not adequately supported by appropriate time sheets. We compared time sheets to other required, supporting time records, such as the police blotter and County dispatch records, and found discrepancies between all of these sources. We also found that the Board and Mayor did not monitor or review the Chief's compensatory time, allowing him to record unsupported compensatory time as accrued and used for himself. We also found that the full-time patrolman accrued sick leave in excess of the amount authorized. As a result of inadequate monitoring of the accrual and usage of leave time, the two full-time officers were improperly credited with leave time valued at more than \$12,000. We found no exceptions with the rates of pay for any of the officers we tested.

Time Records Payroll payments should be based on Board-approved rates and accurate and supported time sheets and records that reflect the actual hours worked. According to the Chief, officers are required to fill out a time sheet² and track hours worked by filling out a police blotter with an in-service time, a record of services performed during their shift and an out-of-service time. In addition, officers are to call in to the County dispatch system at the start of their shift and call out at the end of their shift.

² Until May 2014, time sheets consisted of an annual chart, listing each month and recording the total number of hours worked for each day in a month. These were not submitted to the Clerk-Treasurer for payroll processing. As of May 26, 2014, the Department switched to completing and submitting biweekly time sheets.

During our audit period, the Department payroll totaled nearly \$276,000. We compared the hours paid through payroll to the hours recorded on time sheets, in the police blotter and on County dispatch records and found the following:

- While the majority of hours were recorded on officers' time • sheets, the full-time patrolman and Chief did not consistently record overtime hours that they were paid for on their respective time sheets. As a result, \$6,084 was paid for 234 hours that was not supported by time sheets.
- Officers did not consistently record in-service and out-ofservice times in the police blotter. Often, an officer would sign in at the beginning of a shift, but would not sign out at the end. As a result, hours worked for 105 blotter entries (7 percent) could not be verified. Because several officers work for more than one municipality, it is important to include times to ensure that the appropriate municipality pays for the time worked and officers are not paid by more than one municipality for the same hours, resulting in overpayments.
- For 26 shifts (6 percent) the Chief's out-of-service entry in the police blotter at the end of a shift was recorded by the officer who came on shift immediately following the Chief. Therefore, we could not determine if the Chief completed his full shift or ended his shift early on these occasions.
- Officers did not consistently call in to County dispatch at the beginning and end of each shift. Based on the County dispatch records for our audit period, officers called in to County dispatch for 7,720 (51 percent) of the hours that were paid. Two part-time officers never called in to County dispatch, while the Chief called in 1,356 (30 percent) of the hours he recorded as worked.

Figure 1: Time Records for Officers								
	Payroll Hours	Amount	Time Sheet Hours	Amount	Blotter Hours ^ª	Amount	Dispatch Hours	Amount
Part-Time Officers	6,272 [♭]	\$84,460	6,338°	\$84,309	5,873	\$77,889	4,313	\$56,675
Full-Time Patrolman	4,438	\$72,179	4,385	\$70,777	4,269	\$68,910	2,050	\$33,047
Chief	4,569	\$119,352	4,388	\$114,670	3,693	\$96,507	1,356	\$35,396
Totals	15,279	\$275,991	15,111	\$269,756	13,835	\$243,306	7,719	\$125,118
^a Does not include hours for entries where officers signed in but not out								

Includes hours paid at both regular and overtime pay rates The Chief disallowed certain hours for payroll payment.

The Chief stated that all hours worked may not be recorded in the blotter due to special events or circumstances where officers do not report directly to the police station at the start of their shift but, instead, report directly to the location of the event or call.³ He said that while the hours may not be in the blotter, he is "100 percent sure" that the officers worked the hours for which they were paid. Also, contrary to our initial discussion, at the end of fieldwork the Chief stated that, while it is not necessarily required to call in to County dispatch at the start and end of each shift, he requires his officers to call but does not do so himself. He said that signing in to the laptops kept in each police car would also serve as a call in to County dispatch. However, the officers do not use the laptops. Due to a lack of time records to adequately support hours paid through payroll, Village officials cannot be assured that hours paid during our audit period were always accurately supported. Specifically, the conflicting answers we received from the Chief make us question the legitimacy of the hours. In particular, we question the Chief's hours because another officer logged him out, which is roughly the equivalent of someone else punching an employee out on a time clock. Leave accruals represent time off with pay (vacation, sick, Leave Accruals and Usage compensatory, etc.) earned by officers. The Board should approve the rates of leave accruals and establish a policy or resolution regarding how leave accruals are to be used, monitored and, if applicable, paid. The Chief should monitor the day-to-day usage and accrual of Department leave time. <u>Compensatory Time</u> – Compensatory time is time off with pay that is earned instead of being paid for the overtime that is worked. The Village's Employee Handbook (Handbook) establishes that Village employees work an eight hour day and a 40 hour workweek. The Board adopted a resolution dated June 22, 2009 to authorize the Chief to accrue one compensatory hour for each hour worked over 40 in a weekly pay period and to be paid for these hours up to a maximum of 120 hours annually. The Chief recorded,⁴ earned and used compensatory time throughout our audit period and was paid for overtime.

We reviewed the Chief's compensatory time records and compared them to the hours recorded as worked per the blotter⁵ and found that

³ The Chief stated that the most frequent instances of these types of events occurring were coverage for Halloween, gun range practice and traffic control situations.

⁴ The Chief maintained and kept his own records and no one reviewed them.

⁵ We used blotter hours to compare to compensatory time as this was the sole record which indicated the Chief's start and end times for each shift.

compensatory time was not properly supported as earned. For our audit period, the compensatory time records show the accrual of 415.5 hours, while the blotter shows that only 9.5 hours were worked in excess of 40 hours per week. As such, there was no documentation to support 406 hours or \$10,600 of compensatory time recorded as earned. A total of 208.5 hours, or approximately \$5,400, was paid directly through payroll, while 197.5 hours were used as leave time, leaving an unused compensatory leave balance of 9.5 hours.

Because there was almost a complete lack of documentation that the Chief actually worked the additional hours, his accrual of the \$10,600 of compensatory time was questionable.

<u>Other Leave Time</u> – The Handbook allows for the accrual of vacation and sick leave for full-time officers based on the length of time an officer has been employed by the Village.⁶

We reviewed the vacation and sick leave accruals for both full-time officers and found that sick leave was not properly accrued by the full-time patrolman. The Handbook that was adopted when the patrolman started service with the Village allows for the accrual of 16 hours of sick leave per quarter, or 64 hours per year. However, the leave records show accruals of 96 hours of sick leave per year. Village officials did not have an explanation for the additional hours. However, they indicated that they would investigate the issue. During our audit period, the patrolman's accumulated sick leave balance was overstated by 96 hours, with a value of \$1,593.

The Board has not adopted written policies and procedures for preparing, reviewing and approving Department payroll. Moreover, policies and written procedures regarding leave accruals are inadequate and not consistently followed. In addition, the Board and Mayor did not properly monitor the Chief's pay and leave time and the Chief did not properly monitor his Department's payroll. As a result of these control deficiencies, the two full-time officers were improperly credited for leave time with a value of over \$12,000.

Recommendations 1. The Board, Mayor and Chief should develop and adopt written policies and procedures to address preparing, reviewing and approving timekeeping records.

⁶ For the 2014-15 fiscal year, the Chief may accrue 18 days of vacation leave and 96 hours of sick leave, cumulative to 150 days, per year. The full-time patrolman may accrue eight days of vacation leave and 64 hours of sick leave, cumulative to 150 days, per year.

- 2. The Mayor should ensure that payrolls for the Chief and officers are adequately supported by time sheets (indicating start and end times), the police blotter and/or other available records.
- 3. The Board should clarify policies as they relate to the recordkeeping and accruing of compensatory time.
- 4. The Mayor should closely review current leave balances of the Chief and full-time patrolman and periodically monitor and, if necessary, ensure the adjustment of accumulated leave balances so they do not exceed levels authorized by policies.

Water Accountability

Village officials are responsible for controlling the cost of operating the Village's water system. To fulfill this responsibility, Village officials should track water use throughout the system and identify areas that need attention, particularly large volumes of unaccountedfor water. Unaccounted-for water can result for various reasons, such as source meter errors, faulty customer meters, unmetered customers, accounting procedure errors, illegal connections, storage tank overflows, underground leaks and municipal use such as the flushing of fire hydrants and firefighting.

Procedures should be in place to monitor and identify the cause of water loss. It is essential to perform a periodic reconciliation of water produced with water billed to provide officials with the information necessary to detect and reduce water loss. A large volume of unaccounted-for water could be a warning sign of significant infrastructure problems.

Neither the Board nor the SPW has taken adequate steps to identify and reduce the amount of unaccounted-for water within the Village's system. Village officials do not have written procedures for reconciling the water produced by the Village's water system to the amount billed to customers. While the SPW performs a basic reconciliation of water produced to water billed on a quarterly basis, he did not prepare formal reconciliations comparing the amount of water produced to the total amount metered for both billed and unbilled customers. This type of reconciliation would have allowed Village officials to determine the amount of unaccounted-for water, compare it to industry standards and take steps to correct identified problems.

During the audit period, the Village could not account for 254 million gallons (73 percent) of the water produced. For perspective, this amount of water loss would cover more than one square mile with one foot of water.⁷ The Village produced more than 346 million gallons of water. However, it billed customers for approximately 83 million gallons and had authorized, unbilled usage of 9 million gallons, for a total of 92 million gallons of water recognized as consumed (27 percent of the water produced).

While Village officials were unable to provide specific reasons for the water loss, the SPW stated that he believes that infrastructure leaks and unmetered usage by the Fire Department for firefighting and the

⁷ Environmental Protection Agency publication reference # 810-F-95-001, dated 1995

	flushing of fire hydrants are contributors to the unaccounted-for water. The SPW stated that the water system infrastructure is over 100 years old, and the Village does not have the resources to find all of the leaks. However, he stated that the Village is in the beginning stages of a capital project to map out and identify issues with the water system infrastructure. The SPW also stated that there is no practical way to estimate the amount of water used by the Fire Department because there is no meter at the fire hall. In addition, although a portable meter is available for use at fire hydrants, it is not practical to use during firefighting. Village officials stated that they are working on procedures to best estimate the Fire Department's use of water.
	We estimate that it costs the Village approximately \$.26 for electricity and chemicals to produce 1,000 gallons of water. Therefore, the Village could have saved approximately \$66,000 during our audit period if it did not need to produce the 254 million gallons.
Recommendations	The SPW should:
	5. Perform periodic reconciliations of water produced with amounts billed and identify the causes of significant discrepancies of unaccounted-for water in a timely manner.
	6. Develop a plan to address the causes of significant unaccounted-for water.
	7. Estimate water use for hydrant flushing and firefighting.
	The Board should:
	8. Ensure that the SPW develops procedures for periodically reconciling the amount of water produced with the amount billed and review the reconciliation to determine what action to take to reduce significant unaccounted-for water.

APPENDIX A

RESPONSE FROM VILLAGE OFFICIALS

The Village officials' response to this audit can be found on the following pages.

Village of Franklinville

Incorporated May 28, 1871

March 3, 2015

Jeffrey D. Mazula Chief Examiner of Local Government and School Accountability State of New York Office of The State Comptroller 110 State Street Albany, New York 12236

Dear Mr. Mazula,

Please let this letter serve as the Village of Franklinville's response to the audit conducted by your office.

<u>Audit Question:</u> Are Village police payroll payments based on sufficiently documented hours worked and Board-approved rates?

In response to the audit inquiry for Village Police payroll for the audit period of June 1, 2012 through June 16, 2014, the Village Board concurs with the Audit reports findings with the following qualifications:

Time Records

The Village officials are in agreement that the current procedure for documenting hours worked, leave time accrual, and overtime accrual is inadequate and has not been uniformly followed by all employees of the department.

Not withstanding the above, after independent inquiry into the issues raised by the audit it is the belief of the Village that the employees of the department were properly compensated for the actual time that they had worked and that while not uniformly documented, no employee was compensated by the village for work that they did not actually perform.

The Village Board in response to the audit report has undertaken a comprehensive review of time record documentation, payroll policies and practices for the Franklinville Police Department in response to deficiencies revealed by this audit. The findings and procedures adopted by the Village in response to this audit and the internal review will be stated in the Village's Corrective Action Plan.

Leave Accruals and Usage

P.O. Box 167 · 19 Pennsylvania Ave. · Franklinville, NY 14737 · (716) 676-3010

The Village Board is in agreement that the current procedure requiring the Chief of Police to monitor the day to day usage and accrual of leave time accrual and leave time within the department has not been consistently followed by the department.

The Village Board agrees with the audit report that inadequate documentation was submitted regarding the accrual of compensatory time for the Chief of Police. The Village at the Executive level should have required the Chief of Police to follow the department's own procedures for this documentation. Had this occurred there would be no questions as to the accuracy of the accrual of the Chief's compensatory time. The Village Board understands that the sufficiency of the documentation submitted does raise questions; however we are satisfied that the amount of compensatory time as reported by the Chief at the time of payment was accurate.

The Village Board agrees with the audit reports revelation that a full time patrolman was erroneously over credited for 96 hours of sick leave. The Village Board after inquiry has determined that the overstatement was the result of an entry log error and the credit has been since reversed.

Conclusion

The Village Board agrees with the audit reports conclusion that the Village is lacking the appropriate written policies and procedures for the preparing, reviewing, and approving both payroll and leave accruals for the Village Police Department. Further, the Board and the Mayor did not adequately monitor the Departments leave pay and accrual policies in effect and contained in the Police Departments procedure manual. While the audit did reveal inadequacies that will be addressed in the Village's Corrective Action Plan, both the Village Board and the Mayor are satisfied that no employee of the police department was improperly compensated during the audit period.

The Village Board and the Mayor will seek to incorporate the Comptroller's recommendations in it's Corrective Action Plan.

<u>Audit Question:</u> Do Village officials consistently monitor the amount of water produced in comparison to the amount of water sold to control unaccounted-for water?

The Village Board agrees with the analysis used to determine the quantity of unaccounted for water that in theory could have resulted in a net savings to the water and sewer users of approximately \$65,000.00 during the audit period, however respectfully disagrees with the conclusion that accurate and reconciled reports would have led to a tangible savings. The theoretical savings of \$65,000 while accurate is based on formula that does not account for losses in produced water through leaks in the water delivery system. When dealing with an archaic water delivery system such as that , the leaks and associated costs in producing water that will not otherwise make to an individual meter for accounting purposes, are necessary cost of doing business and must be absorbed into the costs passed on to all end users.

Respectfully, the Village Board disagrees with conclusion of the examiner that it has taken inadequate steps to steps to identify and reduce the amount of unaccounted-for water within the Village's water system.

In June of 2012, upon the recommendation of the Superintendent of Public Works, the Village engaged the services of Carl Calarco, PE as a consulting engineer to assist the department in addressing numerous issues within the water and sewer system, including those issues raised in the audit report.

See Note 1 Page 17 In February of 2013, the consulting engineer began a comprehensive study of the potable water and sanitary sewer systems in an effort to further address the known deficiencies, and to identify and address additional deficiencies. The scope of the study, which is ongoing and as it relates to the water system, was commenced prior to and addresses those issues raised in the audit report. In particular it provides: Leakage testing of the system; Hydrant and Valve Testing; Creation of a working Water Model; Creation of system Mapping; and the generation of Engineering Reports detailing the results of and providing recommendations and associated costs for improvements.

Sincerely,

Robert J. Breton, Village of Franklinville Mayor

APPENDIX B

OSC COMMENT ON THE VILLAGE'S RESPONSE

Note 1

During our audit, the Village could not account for 73 percent of the water it produced. We encourage Village officials to continue pursuing efforts to identify the causes of this significant unaccounted-for water and take corrective action if it is cost effective.

APPENDIX C

AUDIT METHODOLOGY AND STANDARDS

Our objectives were to determine if the Village police payroll payments were properly supported and paid and if unaccounted-for water was monitored and controlled. To accomplish our audit objectives and obtain audit evidence, our procedures included the following:

Police Payroll:

- We reviewed policies and procedures and interviewed Village officials to gain an understanding of the payroll, timekeeping and leave time processes.
- We compared the hours worked as recorded on payroll summaries, time sheets, police blotters and County dispatch records.
- We reviewed overtime worked per payroll summaries for appropriate supporting documentation and approval.
- We reviewed time sheets and payroll summaries for approval by the Chief and Mayor.
- We reviewed Village budgets for approved salaries and regular and overtime pay rates and recalculated payrolls to determine if amounts paid matched to amounts approved.
- We reviewed leave time records for full-time officers to determine if leave time was appropriately used and accrued.

Water Accountability:

- We reviewed the Village tax roll, billing summaries and meter readings to determine if key Village officials and businesses were billed for water and reviewed billing summaries to ensure that bills were accurate and based on actual meter readings, not estimates.
- We interviewed Village officials to gain an understanding of water system operations and procedures, including municipal water use and leak detection.
- We reviewed available water reconciliations for completeness and accuracy.
- We compared water produced based on meter readings for the two Village wells to residential and commercial meter readings to determine the amount of unaccounted-for water.
- We compared the amount of unaccounted-for water to industry standards to determine if the amount of water loss was reasonable.
- We reviewed meter readings and billing summaries to determine if bills were accurately calculated.

- We reviewed Village records to determine the amount of water attributable to municipal use and the flushing of fire hydrants.
- We reviewed electricity and chemical claim vouchers for the water fund to determine the cost to produce 1,000 gallons of water and compared the cost to the amount of unaccounted-for water.

We conducted this performance audit in accordance with GAGAS. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

APPENDIX D

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APPENDIX E

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Andrew A. SanFilippo, Executive Deputy Comptroller Gabriel F. Deyo, Deputy Comptroller Nathaalie N. Carey, Assistant Comptroller

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