

CLIFTON SANITATION DISTRICT

Financial Statements and
Independent Auditor's Report
For the Year Ended December 31, 2019

CLIFTON SANITATION DISTRICT

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MANAGEMENTS DISCUSSION AND ANALYSIS CLIFTON SANITATION DISTRICT FISCAL YEAR 2019

The Clifton Sanitation District (the “District”) offers the readers of the District’s financial statements this narrative overview and analysis of the District’s financial performance during the Fiscal Year ended December 31, 2019. Please read it in conjunction with the financial statements.

CONTENTS

In addition to this Management Discussion and Analysis, this annual report includes:

- * Independent Auditor’s Report
- * Financial Statements – the financial statements of the District report information about the District using accounting methods similar to those used by private sector companies. These statements offer short and long-term financial information about its activities. The audited financial statements of the district are:
 1. Statement of Net Position – The Statement of Net Position provides information about the nature and amounts of investments in resources (assets) and obligations to District’s creditors (liabilities). It also provides the basis for computing the rate of return, evaluating the capital structure of the District, and assessing the liquidity and financial flexibility of the District.
 2. Statement of Activities – The statement that measures the results of the District’s operations over the past year and illustrates the manner in which it has funded its operations. This section will determine profitability and credit worthiness. These results are also a reflection of the economic condition of our district. If the predicted moderate growth continues, we as a District also will continue that moderate growing trend.
 3. Statement of Cash Flows – The reason for this statement is to provide information about the District’s cash receipts and payments during this reporting period. This statement reports cash receipts, cash payments and net changes in cash resulting from operations, investing, and financial activities.
- * Notes to the Financial Statements, which explain in more detail and provide support for the information in the financial statements.
- * Supplementary Information –
Budget comparison Schedule –2019

DAY-TO-DAY OPERATIONAL CONTROL OF THE DISTRICT

For operational control, the District has classified all operations into two distinct categories: Operating and Non-operating. Operating Revenues and Operating Expenses are those items that are allocated to operations and are essential elements for day-to-day operation of the District. Non-operating Revenues are received and reserved for funding Non-operating Expenses that included infrastructure improvement, capacity development, and equipment purchases.

The District operates as a self-supporting enterprise, meaning that the revenue received from wastewater treatment and other Operating revenue sources must be adequate to cover expenses of day-to-day operation of the District. Capital projects, including infrastructure, capacity development, and equipment purchases are funded using Non-operating Revenues. Primarily, Non-operating Revenues are received from the sales of new sewer service connections called Plant Investment Fees. The Operating philosophy is critically dependent upon effective rates and user fees.

The District's day-to-day operational control involves many levels of planning, forecasting and budgeting. Revenues and expenses are allocated to specific functions of the District and staff is required to comply with monthly budget and budget variance parameters. The effectiveness of this system and the development of Cost of Service based fees and rates have been instrumental in operating the District in an efficient and economical manner.

FINANCIAL ANALYSIS OF THE DISTRICT

One of the most important questions asked about the District's finances is "Is the District as a whole better off or worse off as a result of this year's activities?" The Statement of Net Position and the following Statement of Activities are included to answer this question.

	2019	2018
CURRENT ASSETS	\$ 1,892,864	\$ 2,310,297
NON CURRENT ASSETS	37,587,496	35,698,820
TOTAL ASSETS	39,480,360	38,009,117
CURRENT LIABILITIES	828,718	846,409
NON CURRENT LIABILITIES	4,646,667	5,216,905
TOTAL LAIBILITIES	5,475,385	6,063,314
NET POSITION:		
Invested in Capital Assets	27,221,791	24,474,002
Unrestricted	6,783,184	7,471,801
NET POSITION	\$ 34,004,975	\$31,945,803

- The District funds its activities from interest earnings, new tap sales (Plant Investment Fees), and service fee charges.

	<u>2019</u>	<u>2018</u>
Operating Revenue:		
Service Fee Charges	\$ 3,192,858	\$3,056,021
Operating Expense	<u>(2,994,092)</u>	<u>(2,891,583)</u>
Net Income / (Loss) from Operations	198,766	164,438
Net Non-Operating Revenue/(Expense)	<u>1,254,755</u>	<u>258,765</u>
Income before Contributions	<u>1,453,521</u>	<u>423,203</u>
Capital Contributions:		
Plant Investment Fees	275,163	568,737
System Contribution	<u>330,488</u>	<u>57,600</u>
Total Contributed Capital	<u>605,651</u>	<u>626,337</u>
Net Position Beginning	31,945,803	30,896,963
Net Position Ending	<u>34,004,975</u>	<u>31,945,803</u>
Change in Net Position	<u>\$ 2,059,172</u>	<u>\$ 1,048,840</u>

Capital Assets

At the end of 2019, the District had invested \$32,438,696 (net of \$18,172,600) in accumulated depreciation), in a broad range of infrastructure, collection lines, maintenance and office facilities, treatment plant, vehicles and equipment as shown in the following table.

	Balance December 31, 2018	Reclass & Additions	Reclass & Deletions	Balance December 31, 2019
Land	\$ 3,028,297	\$ -	\$ -	\$ 3,028,297
Land Improvements	1,771,804	-	(41,950)	1,729,854
Building & Improvements	22,593,583	12,500	0	22,606,083
System Transmission Lines	14,932,194	3,078,430	(377,500)	17,633,124
Office Furniture & Equipment	195,233	-	(2,993)	192,240
Equipment	<u>5,078,370</u>	<u>364,395</u>	<u>(21,067)</u>	<u>5,421,698</u>
Total	47,599,481	3,455,325	(443,510)	50,611,296
Less Accumulated Depreciation	<u>(17,445,108)</u>	<u>(1,155,935)</u>	428,443	<u>(18,172,600)</u>
Construction in Process	106,772	-	(106,772)	-
Net Capital Assets	<u>\$ 30,261,145</u>	<u>\$ 2,299,390</u>	<u>\$ (121,839)</u>	<u>\$ 32,438,696</u>

The District's sewer system is a combination of the infrastructure contribution of developers, and the District's on-going capital projects.

BUDGETARY HIGHLIGHTS

As required by State Law, the District adopts a budget and appropriates funds for the following year by December 15th of each year. If an amendment is necessary, the Board will approve a supplemental appropriation at a public hearing and file it with the State of Colorado. Budget to actual statements are included as Supplemental Information in the audited financial statements. There were no supplemental appropriations made to the 2018 or 2019 budgets.

	2019 Budget	2019 Actual	2018 Budget	2018 Actual
Service Charges	\$ 3,136,060	\$ 3,192,858	\$ 2,994,933	\$ 3,056,021
Misc. Income	112,960	120,417	97,052	261,317
Plant Investment Fees	212,600	275,163	163,050	568,737
Investment Income	97,000	179,941	42,000	81,621
Grant Income	42,000	1,122,839	30,000	94,175
Total Revenues	\$ 3,600,620	\$ 4,891,218	\$ 3,327,035	\$ 4,061,871
Admin. Expenses	\$ 604,377	\$ 508,140	\$ 590,386	\$ 488,014
Operating Expenses	1,624,135	1,338,873	1,512,701	1,240,611
Capital Outlay	3,504,025	3,018,065	468,127	592,897
Debt Service	733,451	719,824	732,626	729,939
Total Expenses	\$ 6,465,988	\$ 5,584,902	\$ 3,303,840	\$ 3,051,461

BUDGETARY HIGHLIGHTS

2019 Actual Expenses vs. Budget were \$881,086 favorable variance
 2019 Actual Revenues vs. Budget were \$1,290,598 favorable variance, primarily due to grant funding received in 2019.

2018 Actual Expenses vs. Budget were \$252,373 favorable variance
 2018 Actual Revenues vs. Budget were \$734,836 favorable variance

The actual tap fee revenue received in 2019 was more than budgeted due primarily to an improved building economy.

Miscellaneous revenues include offsite wastewater hauling from oil and gas camps and gravel mining royalties. Both revenue sources are subject to economic conditions and may not be realized. Contingency plans are in place to defer or eliminate capital projects if not realized.

The difference in Grant revenue reflects a Federal Mineral Lease grant for \$1,000,000 that was awarded to the District in 2019.

CAPITAL ASSETS AND DEBT ACTIVITIES

During 2019, the District expended \$3,018,065 for capital related expenses and to complete capital improvements for treatment and infrastructure projects. The following are some of the major improvements that were added or are in progress for the system in 2019.

Capital Outlays:

During 2019, \$12,500 was spent on a rolling gate for the plant; \$364,394 was spent on equipment, of which a Rausch Camera Van costing \$296,580; \$2,641,170 was spent on line construction and \$330,488 was contributed through new subdivisions being accepted into the District.

The District's wastewater systems are operated in accordance with a host of federal, state, and local public health and environmental regulations and standards. These mandates continue to evolve and become more stringent. Regulatory projects are typically mandated and consequences of non-compliance can be severe (i.e., administrative penalties, building moratoriums, etc.). Therefore, regulatory requirements are considered highest-priority projects for the District.

The 2020 Capital Improvement Plan (CIP) outlines a small number of projects, programs, and policies for Clifton Sanitation District to implement in 2020 to continue to protect public health and water quality and ensure sufficient wastewater capacity to meet future growth needs.

Debt Activities

Adequate funding from revenues projected in 2020 will be sufficient to pay the scheduled debt service amounts. The District does not plan to incur new debt for 2020 or to finance capital projects. Note 8 in the Notes to the Financial Statements provide the details of the District's long-term indebtedness.

ECONOMIC FACTORS AND NEXT YEAR'S BUDGET AND RATES

Clifton Sanitation District is located on the Western Slope of Colorado, between Grand Junction and Palisade and provides sanitary sewer service to an estimated 21,000 residents of Clifton and the Community of Whitewater.

The number of taps sold by the District is tightly correlated to the boom and bust cycle of western Colorado's economy. The cyclical nature of western Colorado's economy makes it difficult for the District to plan for future service needs. Boom years can result in growth too rapid for the District to keep pace while bust years prevent the District from collecting enough revenue to maintain existing infrastructure.

The monthly sewer service charges are based upon the cost to collect, treat and dispose of wastewater from one single-family unit. The charges comprise the funds for operations, maintenance and debt service.

In 2017, the District authorized Farnsworth Consulting Group to update the previous Master Plan completed in 2008, develop an asset management needs assessment, and update the last rate study completed in 2011. The Master Plan update evaluated the collection system and provides the District with an up to date capital improvement plan for future improvement recommendations based on dwelling unit increases and system capacity projections.

Asset management consists of systematic and coordinated activities and practices through which the District optimally manages its physical assets and the performance and expenditure over their lifecycle. The goal of asset management is to ensure that the District has sufficient information to make value-based decisions related to operating, maintaining, repairing, rehabilitating, and replacing assets.

Red Oak Consulting completed the last rate study in December 2011. The updated study will reflect the current financial position of the District and the need to have a fee system to provide the capital for future projects and on-going operation of the District. The study recommended fee changes necessary to maintain the District in a strong financial position. The rate study included a comprehensive cash flow and financial analysis, cost of service analysis, examination of the financial status and policies, and proposed rate and fee schedule adjustments.

The District has an Intergovernmental Agreement, (IGA) with the Whitewater Public Improvement District, (WWPID) to treat the sanitary sewer from the Whitewater community. The District has been treating wastewater from the WWPID affective December 2012. In addition to the Whitewater Community, the District will be providing service to the properties adjacent to the sewer main between the WWPID and the District treatment facility. This may result in a modest growth in tap sales in 2020 and is expected to continue in subsequent years.

User fees, growth, and increasing water quality standards being implemented by the Colorado Department of Public Health & Environment (CDPHE) are contributing factors that will be evaluated before a final budget is adopted for the next year's budget.

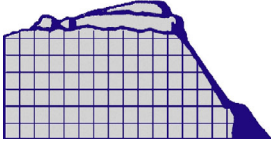
The 2019 budget reflected a 3.5% adjustment to monthly service fees. There are no rate increases proposed in 2020 and a 3.5% adjustment is recommended for 2021. It is the District's intent to update the financial analysis annually to recognize changes in customer billing data, operating expenditures and capital improvement needs. Future rate increases will likely be necessary to ensure that adequate reserves are in place to address any operating deficit as well as the necessary funds to address infrastructure rehabilitation and replacement.

CONTACTING THE DISTRICT MANAGER

This financial report is designed to provide our citizens, customers, and creditors with the general overview of the District's finances and demonstrate the District's accountability for the money it receives. If you have any questions concerning this report or need additional information please contact the Manager of Clifton Sanitation District 3217 D Road, Clifton, Colorado 81520.

Brian Woods

Brian Woods,
District Manager
January 27, 2020`



INDEPENDENT AUDITOR'S REPORT

To the Board of Directors
Clifton Sanitation District
Clifton, Colorado

I have audited the accompanying financial statements of the business-type activities of Clifton Sanitation District as of and for the year ended December 31, 2019, and the related notes to the financial statements, which collectively comprise the District's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes 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.

Auditor's Responsibility

My responsibility is to express an opinion on these financial statements based on my audit. I conducted my audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that I plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, I express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my audit opinion.

Opinions

In my opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the business-type activities of the Clifton Sanitation District, as of December 31, 2019, and the respective changes in financial position and, cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis information on pages i-vii be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. I have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to my inquiries, the basic financial statements, and other knowledge I obtained during my audit of the basic financial statements. I do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Information

My audit was conducted for the purpose of forming an opinion on the financial statements that collectively comprise the Clifton Sanitation District's basic financial statements. The budgetary comparison information on page 14-15, is presented for purposes of additional analysis and is not a required part of the basic financial statements. The schedule of expenditures of federal awards on page xx, is presented for purposes of additional analysis as required by Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative requirements, Cost Principles, and audit requirements for federal Awards, and is also not a required part of the basis financial statements.

The budgetary comparison information and the schedule of expenditures of federal awards are responsibility of management and were derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepared the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In my opinion, the budgetary comparison information and the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with Government /auditing Standards, I have also issued my report dated January 27, 2020, on my consideration of the District's internal control over financial reporting and on my tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of my testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the District's internal control over financial reporting and compliance. That report is an integral part of the audit performed in accordance with Government Auditing Standards in considering the District's internal control over reporting and compliance.

Paul D. Miller, CPA, LLC

Grand Junction, CO
January 27, 2020

CLIFTON SANITATION DISTRICT
STATEMENT OF NET POSITION
As of December 31, 2019

ASSETS

CURRENT ASSETS

Cash on hand and in banks	\$ 1,170,222
Accounts receivable-service fees-less \$0 allowance	592,712
Other receivables	10,829
Inventory (Cost)	84,728
Prepaid expenses	20,721
Accrued interest receivable	<u>13,652</u>
Total Current Assets	<u>1,892,864</u>

NONCURRENT ASSETS:

Cash -HRA	1,037
Investments	5,147,763
Capital assets	<u>32,438,696</u>
Total Noncurrent Assets	<u>37,587,496</u>

TOTAL ASSETS	<u><u>\$ 39,480,360</u></u>
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LIABILITIES

CURRENT LIABILITIES

Accounts payable	82,258
Other current liabilities	2,688
Unearned gravel revenue	63,517
Accrued payroll	16,561
Accrued interest payable	53,463
Accrued compensated absences	39,993
Current loans payable	<u>585,238</u>
Total Current Liabilities	<u>843,718</u>

LONG-TERM LIABILITIES

Loans payable less current portion	<u>4,631,667</u>
Total Long-term Liabilities	<u>4,631,667</u>
TOTAL LIABILITIES	<u>5,475,385</u>

NET POSITION

Invested in capital assets net of related debt	27,221,791
Unrestricted	<u>6,783,184</u>
NET POSITION	<u>\$ 34,004,975</u>

TOTAL LIABILITIES AND NET POSITION	<u><u>\$ 39,480,360</u></u>
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The accompanying notes are an integral part of this statement

CLIFTON SANITATION DISTRICT
STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION
For the Years Ended December 31, 2019

OPERATING REVENUE		
Charges for services		\$ 3,192,858
OPERATING EXPENSES		
Treatment		1,127,293
Collection		211,580
Depreciation		1,155,935
General operating expenses		499,284
Total Operating Expense		<u>2,994,092</u>
Net (Loss) From Operations		<u>198,766</u>
NON-OPERATING REVENUE (EXPENSES)		
Miscellaneous income		120,417
Grant income		1,122,839
Investment income		179,941
Investment expense		(8,856)
Interest expense		(159,586)
Total Non-Operating Revenue		<u>1,254,755</u>
NET (LOSS) INCOME BEFORE CONTRIBUTIONS		<u>1,453,521</u>
CAPITAL CONTRIBUTIONS:		
Plant investment fees		275,163
System contribution (non cash)		330,488
Total Capital Contribution		<u>605,651</u>
Change in Net Position		2,059,172
Total Net Position - Beginning		<u>31,945,803</u>
Total Net Position - Ending		<u>\$ 34,004,975</u>

The accompanying notes are an integral part of this statement

CLIFTON SANITATION DISTRICT
STATEMENT OF CASH FLOWS
For the Years Ended December 31, 2019

INCREASE (DECREASE) IN CASH & CASH EQUIVALENTS	
CASH FLOW FROM OPERATING ACTIVITIES	
Cash received from customers	\$ 3,130,873
Other cash receipts	1,267,037
Cash payments to and on behalf of employees	(911,463)
Cash payments to suppliers	(2,180,701)
NET CASH PROVIDED BY OPERATING ACTIVITIES	1,305,746
CASH FLOWS FROM CAPITAL AND RELATED FINANCING ACTIVITIES	
Acquisition & construction of capital assets	(3,020,153)
(Increase) Decrease in restricted cash	402
Payment of loans	(570,238)
Plant investment fees	275,163
NET CASH PROVIDED (USED) BY CAPITAL AND RELATED FINANCING ACTIVITIES	(3,314,826)
CASH FLOWS FROM INVESTING ACTIVITIES	
Net Investment income (Net of Investment expense of \$8,856)	111,960
Withdrawal from investment	600,000
Net sale (purchase) of investments	836,862
NET CASH PROVIDED (USED) BY INVESTING ACTIVITIES	1,548,822
NET INCREASE (DECREASE) IN CASH & CASH EQUIVALENTS	(460,258)
CASH - Beginning of year	1,630,480
CASH - End of year	\$ 1,170,222
RECONCILIATION OF OPERATING INCOME (LOSS) TO NET CASH PROVIDED BY OPERATING ACTIVITIES:	
Operating Income (Loss)	\$ 198,766
Adjustment to reconcile operating income (loss) to net cash provided by operating activities	
Depreciation	1,155,935
Loss on Disposal of Fixed Assets	11,561
Change in assets and liabilities	
(Increase) decrease in accounts receivable	(42,250)
(Increase) decrease in inventory	(35,417)
(Increase) decrease in prepaid expenses	25,006
(Increase) decrease in interest receivable	9,836
Increase (decrease) in accounts payable	(17,971)
Increase (decrease) in compensated absences payable	8,176
Increase (decrease) in unearned revenue	(7,515)
Increase (decrease) in accrued payroll	2,700
Increase (decrease) in other current payables	(3,081)
Total adjustments	1,106,980
NET CASH PROVIDED BY OPERATING ACTIVITIES	\$ 1,305,746
NON-CASH INVESTING, CAPITAL, AND RELATED FINANCING ACTIVITIES:	
Market value change	\$ 80,352
Acceptance of Subdivisions	\$ 330,488
Interest expense	\$ 155,959
Capital assets purchased by accounts payable	\$ 12,500

The accompanying notes are an integral part of this statement

CLIFTON SANITATION DISTRICT
NOTES TO THE FINANCIAL STATEMENTS
December 31, 2019

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

HISTORY AND ACTIVITY

The Clifton Sanitation District operates as a Special District formed by an election in 1967. The District was organized under the provisions of the Colorado Revised Statutes, 1963 Chapter 89, Article 5, as amended. The purpose of the District is to operate and maintain the sanitary sewer system of the District.

A Revenue Bond Resolution accomplished initial financing for the construction of the sewer facilities in 1968, whereby the District authorized the issuance of general obligation bonds in the principal amount of \$471,190. In addition to the financing arranged through the Farmers Home Administration of the United States Department of Agriculture, an initial development grant was made to the District in the amount of \$222,200 that helped defray development costs. In consideration for the grant from the Farmers Home Administration, the District has agreed to comply with certain terms and conditions as set forth in the Association Sewer System Grant Agreement dated February 21, 1968.

The accounting policies of the Clifton Sanitation District conform to generally accepted accounting principles. The following is a summary of such significant policies.

REPORTING ENTITY

Clifton Sanitation District is the primary government operating as a sanitation enterprise fund. The District has no component units.

BASIS OF PRESENTATION – FUND ACCOUNTING

The operations of the District are accounted for as an enterprise fund. Enterprise funds are used to account for operations (a) that are financed and operated in a manner similar to private business enterprises – where the intent of the governing body is that the costs (expenses, including depreciation) of providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges; or (b) where the governing body had decided that periodic determination of revenues earned, expenses incurred, and/or net income is appropriate for capital maintenance, public policy, management control, accountability or other purpose.

INVESTMENTS

Investments, consisting of funds invested in a local government investment pool (Note 9), are measured at fair value in accordance with GASB Statement 72, Fair Value Measurement and Application.

BASIS OF ACCOUNTING

The District uses the accrual basis of accounting. Revenues are recognized when earned, and expenses are recognized when incurred. Operating revenues and expenses generally result from providing services in connection with the District's principal ongoing operations. All revenues and expenses not meeting this definition are reported as non-operating revenues and expenses.

CLIFTON SANITATION DISTRICT
NOTES TO THE FINANCIAL STATEMENTS
December 31, 2019

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES-CONTINUED

BASIS OF ACCOUNTING-CONTINUED

It requires the classification of net position into three components- invested in capital assets, net of related debt, restricted, and unrestricted. These classifications are defined as follows:

- Invested in capital assets, net of related debt – This consists of capital assets, including restricted capital assets, net of accumulated depreciation and reduced by the outstanding balances of any bonds, mortgages, notes or other borrowings that are attributable to the acquisition, construction, or improvement of those assets.
- Restricted – This consists of constraints placed on net position use through external restrictions imposed by creditors (such as through debt covenants,), grantors, contributors, or law or regulations of other governments or constraints imposed by law through constitutional provisions or enabling legislation.
- Unrestricted – This consists of net position that do not meet the definition of “restricted” or “invested in capital assets, net of related debt”.

CAPITAL ASSETS

The fund of the District is accounted for on a cost of service or “capital maintenance” measurement focus. This means that all assets and all liabilities associated with the activity of the District are included on the balance sheet. Equipment and property are recorded at cost. Depreciation of all exhaustible fixed assets is charged as an expense against operations. Accumulated depreciation is reported on the balance sheet. Depreciation is provided over estimated useful lives of 5-50 years, using the straight-line method. Maintenance and repairs are charged to expense as incurred, while significant betterments and replacements are recorded as increases to equipment. As assets are retired or disposed of, the cost and associated accumulated depreciation are removed from the accounts, and gains or losses on these sales or disposals are included in income. It is the District’s policy to capitalized assets that cost \$1,500 or more and have a two year life or longer.

BUDGET BASIS OF ACCOUNTING

The annual budget is prepared and approved by the board of directors in accordance with the State of Colorado Financial Management Manual. The budget is submitted to Mesa County and the District adopts an appropriation resolution for the next fiscal year before December 31. The Board of Directors may amend the appropriation resolution at any time during the year if warranted by circumstances.

The budget basis of accounting differs from the generally accepted accounting principles (GAAP) basis in the contributed capital is included in revenue, outlays for acquisition of fixed assets are included as expenses.

TAX, SPENDING AND DEBT LIMITATIONS

Colorado voters passed an amendment to the State Constitution, Article X, Section 20, which has several limitations, including revenue raising, spending abilities, and other specific requirements of state and local governments. The amendment is complex and subject to judicial interpretation. The District believes it complies with the requirements of the law because it does not collect any taxes or other public funds and is, therefore, exempt from the provisions of the law. However, the District has made certain interpretations of the law’s language in order to determine its compliance.

CLIFTON SANITATION DISTRICT
NOTES TO THE FINANCIAL STATEMENTS
December 31, 2019

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES-CONTINUED

COMPENSATED ABSENCES

Eligible employees may accrue sick leave but are not paid upon leaving employment. All eligible employees are entitled to vacation based upon their years of service, but in no case may they accrue more than 42 days of vacation time. Total accrued compensated absences for 2019 were \$39,993.

BUDGETARY BASIS OF ACCOUNTING

The annual budget is prepared and approved by the Board of Directors in accordance with the State of Colorado Financial Management Manual. The budget is submitted to Mesa County and the District adopts an appropriation resolution for the next fiscal year before December 31. The Board of Directors may amend the appropriation resolution at any time during the year if warranted by circumstances.

The budget basis of accounting differs from the generally accepted accounting principles (GAAP) basis in that contributed capital (plant investment fees) is included as revenue, outlays for debt retirement and acquisition of fixed assets are included as expenses.

ALLOWANCE FOR DOUBTFUL ACCOUNTS

All taxes and service fees become a lien on property if not paid. However, due to the cost of filing liens and the time involved, the District elects to write off small balances from time to time. All service fees were considered collectible at December 31, 2019.

USE OF ESTIMATES

The presentation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosures of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates.

AVAILABILITY OF SERVICE CHARGES

As required by Colorado statute, the use of availability of services charges is restricted to meeting current debt service requirements.

SUBSEQUENT EVENTS

Management has reviewed subsequent events through the date of the audit report.

RISK MANAGEMENT

Clifton Sanitation District is, as are most governmental entities, exposed to a variety of risks that result in losses. These risks include possible loss from acts of God, injury to employees, or breach of contract. Clifton Sanitation District has financed losses that may arise from these and other events by purchasing commercial insurance. There were no reductions in coverage from 2018 to 2019. Settlements have not exceeded coverage in any of the past four years.

ACCRUED LIABILITIES AND LONG-TERM OBLIGATIONS

In general, payables and accrued liabilities are paid in a timely manner and in full from current financial resources and are reported as current obligations for the fund. Long-term bond obligations are accrued as a long-term liability on the financial statements.

CLIFTON SANITATION DISTRICT
NOTES TO THE FINANCIAL STATEMENTS
December 31, 2019

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES-CONTINUED

RESTRICTED ASSETS/RESERVATIONS OF NET POSITION

Assets are reported as restricted when limitation on their use change the nature or normal understanding of the availability of the asset. Such constraints are either imposed by creditors, contributors, grantors, laws of other governments, or imposed by enabling legislation. Reservations of net position arise from certain Board designations of net position, as well as the aforementioned constraints. It is the District's policy to use restricted funds first, for expenditures which both restricted and unrestricted funds are available.

NOTE 2 – CAPITAL ASSETS

A summary of changes in fixed assets follows:

For 2019:

	Balance December 31, 2018	Reclass & Additions	Reclass & Deletions	Balance December 31, 2019
Land	\$ 3,028,297	\$ -	\$ -	\$ 3,028,297
Land Improvements	1,771,804	-	(41,950)	1,729,854
Building & Improvements	22,593,583	12,500	-	22,606,083
System Transmission Lines	14,932,194	3,078,430	(377,500)	17,633,124
Office Furniture & Equipment	195,233	-	(2,993)	192,240
Equipment	5,078,370	364,395	(21,067)	5,421,698
Total	47,599,481	3,455,325	(443,510)	50,611,296
Less Accumulated Depreciation	(17,445,108)	(1,155,935)	428,443	(18,172,600)
Construction in Process	106,772	-	(106,772)	-
Net Capital Assets	<u>\$ 30,261,145</u>	<u>\$ 2,299,390</u>	<u>\$ (121,839)</u>	<u>\$ 32,438,696</u>

NOTE 3 – CASH AND DEPOSITS

The Colorado Public Deposit Protection Act (PDPA) requires that all units of local government deposit cash in eligible public depositories; state regulators determine eligibility. Amounts on deposit in excess of federal insurance levels must be collateralized. The eligible collateral is determined by the PDPA. PDPA allows the institution to create a single collateral pool for all public funds. The pool is to be maintained by another institution or held in trust for all the uninsured public deposits as a group. The market value of the collateral must be at least equal to the aggregate uninsured deposits.

CLIFTON SANITATION DISTRICT
 NOTES TO THE FINANCIAL STATEMENTS
 December 31, 2019

NOTE 3 – CASH AND DEPOSITS-CONTINUED

	<u>2019</u>
Cash and investments consisted of the following:	
Uninsured	\$ 589
Deposits: Insured	
Checking, Money markets, CD's	258,911
Deposits: Collateralized	<u>911,758</u>
TOTAL DEPOSITS	<u>1,171,258</u>
Investments	
U.S. Treasury NT. (Level 2)	1,901,812
Federal National Mortgage (Level 2)	498,093
Freddie MAC (Level 2)	749,405
Federal Home Loan Bank Notes (Level 2)	<u>1,998,453</u>
(Rated by Moody's Aaa & S&P AAA)	
TOTAL INVESTMENTS	<u>5,147,763</u>
TOTAL	<u>\$ 6,319,021</u>

Colorado Statutes specify investment instruments meeting defined rating and risk criteria in which local government entities may invest. Authorized investments include obligation of the United States and certain U.S. government agency securities; certain international agency securities; general obligation and revenue bonds of U.S. local Colorado Statutes specify investment instruments meeting defined rating and risk criteria in which local government entities may invest. Authorized investments include obligation of the United States and certain U.S. government agency securities; certain international agency securities; general obligation and revenue bonds of the U.S. local government entities; bankers' acceptance of certain banks; commercial paper; local government investment pools; written repurchase agreements collateralized by certain authorized securities; certain money market funds, and guaranteed contracts.

The Districts investments at December 31, 2019 are registered in the District's name, and are categorized above to give an indication of the level of risk assumed by the District at year-end.

Of the insured money in the money market shown above, \$8,911 is insured through a private insurance carrier retained by Charles Schwab on behalf of Clifton Sanitation District. and \$250,000 is collateralized under P.D.P.A.

The District considers cash in the bank, cash on hand, and investment with original maturities of three months or less as cash and cash equivalents.

NOTE 4 – PENSION PLAN

The District provides pension benefits for all of its full-time employees through a defined contribution plan that was adopted by resolution April 4, 1994. The plan adopted is part of the Colorado County Officials and Employee Retirement Association. The contribution rate is equal to 6% of eligible employees' compensation from the District and 6% rate for the employee. The District's total payroll for the year ending December 31, 2019 was \$604,406. The contribution for 2019 was \$36,264 for the employer and \$36,264 by the employee. The Employer has the ability to authorize benefit terms as well as amend those terms.

The District also offers it employees the ability to contribute to a Deferred Compensation Plan (457) if they so choose. At December 31, 2019, one employee is contributing to the plan. The District does not match the contributions to this plan.

CLIFTON SANITATION DISTRICT
 NOTES TO THE FINANCIAL STATEMENTS
 December 31, 2019

NOTE 5 – CHANGE IN CAPITAL CONTRIBUTIONS (UNRESTRICTED NET POSITION)

A summary of the changes in the contributed capital accounts for the years ended December 31, 2019 is as follows:

Tap fees	\$ 275,163
Donated sewer lines by developers	<u>330,488</u>
	<u>\$ 605,651</u>

NOTE 6 – MEDICAL REIMBURSEMENT PLAN (HRA)

In 2011, the District established an HRA plan to cover employees' deductible. For 2019, the Board has approved a \$1,040 per month for participant, spouse, and/or qualified dependents. The aggregate maximum qualified benefit amount to be available for all plan years combined is \$12,480. The HRA dollars must first be applied to the District's group health insurance premiums for spousal or dependent coverage. Any remaining dollars can be used for IRS Code 213 (d) expenses with the exception of individual insurance premiums. The funds remain the District's when employee leave or are terminated and the annual funding is to be determined by the Board and is not an automatic event.

NOTE 7 – LOANS/BONDS PAYABLE

Water Pollution Control Revolving Fund (WPCRF). This loan for \$2,000,000 is part of a total package that deals with the dissolution of Clifton Sanitation District # 1, (not related) the assumption of the District's # 1 area by Clifton Sanitation District. These funds were used for the plant investment portion of the District new plant, and the remaining \$500,000 was used for the closing down of the District's # 1 lagoons and final business. The \$2,000,000 carries no interest and is payable over twenty years. The first payment will be made May and November of each year beginning May 1, 2007. The payments will be \$47,619 each loan payment date. Below is the amortization of the total \$2,000,000:

2020	\$ 95,238
2021	95,238
2022	95,238
2023	95,238
2024	95,238
2025-2027	<u>285,715</u>
	761,905
Less Current	<u>(95,238)</u>
Total	<u><u>\$ 666,667</u></u>

CLIFTON SANITATION DISTRICT
NOTES TO THE FINANCIAL STATEMENTS
December 31, 2019

NOTE 8 – LOANS/BONDS PAYABLE-CONTINUED

Beginning Balance 1/1/2019	\$ 857,143
Payment 2019	<u>95,238</u>
Ending Balance 12/31/2019	<u>\$ 761,905</u>

In 2015, District refinanced a loan from the Colorado Water Resources & Power Development Authority (CWRPDA). The total of the loan was \$9,800,000. At the time of refinancing, the loan balance was \$6,295,000. The remaining life of the note is 10 years, at an interest rate of 3.64%. Payments are made in February and August of each year. The funds were used for the construction of a new treatment plant. Following is the amortization of payment of these funds.

Beginning Balance 1/1/19	4,930,000
2019 payments	<u>475,000</u>
Ending Balance 12/31/19	<u>\$ 4,455,000</u>

Year	Principal	Interest	Total
2020	\$ 490,000	\$ 146,288	\$ 636,288
2021	505,000	133,862	638,862
2022	520,000	120,425	640,425
2023	535,000	102,387	637,387
2024	555,000	83,864	638,864
2025-2027	<u>1,850,000</u>	<u>62,378</u>	<u>1,912,378</u>
	4,455,000	649,204	5,104,204
Less Current	<u>(490,000)</u>	<u>(146,288)</u>	<u>(636,288)</u>
Long-term Portion	<u>\$ 3,965,000</u>	<u>\$ 502,916</u>	<u>\$ 4,467,916</u>

Total Debt Summary:

Year	Principal	Interest	Total
2020	\$ 585,238	\$ 146,288	\$ 731,526
2021	600,238	133,862	734,100
2022	615,238	120,425	735,663
2023	630,238	102,387	732,625
2024	650,238	83,864	734,102
2025-2027	<u>2,135,714</u>	<u>62,378</u>	<u>2,198,092</u>
	5,216,904	649,204	5,866,108
Less Current	<u>(585,238)</u>	<u>(146,288)</u>	<u>(731,526)</u>
Long-term Portion	<u>\$ 4,631,666</u>	<u>\$ 502,916</u>	<u>\$ 5,134,582</u>

CLIFTON SANITATION DISTRICT
NOTES TO THE FINANCIAL STATEMENTS
December 31, 2019

NOTE 9 – SUMMARY OF FAIR VALUE EXPOSURE

The District categorizes its fair value measurement within the fair value hierarchy established by generally accepted accounting principles. The hierarchy is based on the valuation inputs used to measure the fair value of the asset. Level 1 input are quoted prices in active markets for identical assets; Level 2 inputs are significant other observable inputs; Level 2 inputs are significant unobservable inputs.

The inputs and methodology used for valuing the Organization’s financial assets and liabilities are not indicators of the risk associated with those instruments.

The following table provides fair value measurement information for financial assets and liabilities measured at fair value on a recurring basis as of December 31, 2019:

<u>Description</u>	<u>Investment in Securities</u>
Level 1: Quoted prices:	\$ -
Level 2: Other significant observable inputs:	5,147,763
Level 3: Significant unobservable inputs	<u>-</u>
Total fair value	<u>\$5,147,763</u>

NOTE 10 – LEASE

The District leases a copier. The terms of the lease are as follows: 60 months at 210.53 per month. The copier is on an operating lease, as the District will turn the copier over at the end of the lease term. Following is the yearly lease amt.

2020		\$ 2,526
2021		<u>1,263</u>
Total		<u>\$ 3,789</u>

NOTE 11 – REQUIRED RESERVES

As required by the Colorado Water Resources & Power Development Authority, Clifton Sanitation District must have reserve cash that is can meet the required O & M as stipulated in the 2006 Note agreement. For the 2020 budget, the District manages the reserve fund to include operating reserves utilizing six months of operating expenses, (\$1,100,000), Emergency Capital Reserves of approximately 1% of the value of the system \$500,000; debt service reserves are one year of debt service, (\$733,451). The District believes that it meets this requirement.

SUPPLEMENTAL INFORMATION

CLIFTON SANITATION DISTRICT
SCHEDULE OF REVENUE, EXPENSES AND CHANGES IN NET POSITION
BUDGET AND ACTUAL (NON-GAAP BASIS)
For the Years Ended December 31, 2019

	Actual	Budget	Variance Favorable (Unfavorable)
REVENUES			
Service Charges	\$ 3,192,858	\$ 3,136,060	\$ 56,798
Miscellaneous income	120,417	112,960	7,457
Plant investment fee	275,163	212,600	62,563
Grant income	1,122,839	97,000	1,025,839
Investment income	179,941	42,000	137,941
Total Revenue	<u>4,891,218</u>	<u>3,600,620</u>	<u>1,290,598</u>
EXPENSES:			
Treatment:			
Salaries	464,133	460,627	(3,506)
Employee benefits	189,421	213,963	24,542
Chemicals	39,294	38,008	(1,286)
Utilities	117,162	170,135	52,973
Insurance-Treatment	22,026	20,412	(1,614)
Repairs & maintenance	198,923	268,465	69,542
Fuel	8,592	11,500	2,908
Lab and other tests	28,252	72,343	44,091
Vehicle expense	30,208	35,749	5,541
Other	29,282	45,126	15,844
Total Treatment Expenses	<u>1,127,293</u>	<u>1,336,328</u>	<u>209,035</u>
Collection:			
Salaries	10,200	34,569	24,369
Employee benefits	1,778	15,097	13,319
Repairs & maintenance	55,825	96,832	41,007
Computer & Internet support	4,154	2,610	(1,544)
Line maintenance	121,155	116,699	(4,456)
Traffic control	18,468	22,000	3,532
Total Collection Expense	<u>211,580</u>	<u>287,807</u>	<u>76,227</u>
General & Administrative:			
Salaries	184,004	180,851	(3,153)
Employee benefits	73,347	72,784	(563)
Communication	14,856	13,290	(1,566)
Insurance and bonds	9,439	8,748	(691)
Professional fees	49,885	62,200	12,315
Directors' fees and expense	7,081	9,800	2,719
Miscellaneous	17,107	100,000	82,893
Vehicle expense	1,606	2,905	1,299
Training & education	7,272	27,000	19,728
Permits and fees	14,811	24,750	9,939
Occasional labor	23,332	7,000	(16,332)
Safety expense	20,863	3,800	(17,063)
Advertising	8,277	1,540	(6,737)
Office supplies and postage	67,404	80,889	13,485
Investment expense	8,856	8,820	(36)
Total General & Administrative Expense	<u>508,140</u>	<u>604,377</u>	<u>96,237</u>

CLIFTON SANITATION DISTRICT
SCHEDULE OF REVENUE, EXPENSES AND CHANGES IN NET POSITION
BUDGET AND ACTUAL (NON-GAAP BASIS)
For the Years Ended December 31, 2019

	Actual	Budget	Variance Favorable (Unfavorable)
Total Expenses-carried forward	\$ 1,847,013	\$ 2,228,512	\$ 381,499
Capital outlays	3,018,065	3,504,025	485,960
Debt service:			
Principal	560,238	570,238	10,000
Interest	159,586	163,213	3,627
	<u>5,584,902</u>	<u>6,465,988</u>	<u>881,086</u>
EXCESS REVENUES OVER (UNDER) EXPENSES	<u>(693,684)</u>	<u>\$ (2,865,368)</u>	<u>\$ 2,171,684</u>
Adjustments to budgetary basis:			
Capital outlay	3,018,065		
System contribution	330,488		
Depreciation	(1,155,935)		
Debt service	560,238		
CHANGE IN NET POSITION	<u>\$ 2,059,172</u>		

SUPPLEMENTAL DATA

CLIFTON SANITATION DISTRICT
Schedule of Expenditures of Federal Awards
For the Year Ended December 31, 2019

Federal Grantor/Pass-through Grantor/Program Title	Federal CFDA Number	Federal Expenditures
Major Programs:		
U.S. Department Interior		
Passed through from Colorado Department of Local Affairs		
Minerals Leasing Act	15.437	\$ 1,000,000
Total		<u>\$ 1,000,000</u>

* Denotes Major Program

Note: The accompanying schedule of expenditures of federal awards includes the federal grant activity of Clifton Sanitation District under programs of the federal government for the year ended December 31, 2019, and is presented on the accrual basis of accounting.

The information in this schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance).

Therefore, some amounts presented in this schedule may differ from amounts presented in, or used in the preparation of the basic financial statements.

10% de minimums rule not used.

CLIFTON SANITATION DISTRICT
 Schedule of Findings and Questioned Costs And
 Prior Years Findings and Questioned Costs
 For the Year Ended December 31, 2019

SECTION I – SUMMARY OF AUDITOR’S RESULTS

Financial Statements

Type of auditor’s report issued: UNMODIFIED

Internal control over financial reporting:

Material weakness identified? NONE NOTED

Significant deficiency identified that is not considered material weaknesses? NONE NOTED

Noncompliance material to financial Statements noted? NONE NOTED

Federal Awards

Internal control over major programs:

Material weakness identified? NONE NOTED

Significant deficiency identified that is not considered material weaknesses? NONE NOTED

Type of auditor’s report issued: UNMODIFIED

Any auditing findings that are required to be reported in accordance with the Uniform Guidance NONE NOTED

Identification of major program:

Aging Cluster 15.437 \$1,000,000

Dollar threshold used to distinguish between Type A and Type B programs

\$750,000

Auditee qualified as low-risk auditee?

NO

CLIFTON SANITATION DISTRICT
Schedule of Findings and Questioned Costs And
Prior Years Findings and Questioned Costs
For the Year Ended December 31, 2019

SECTION II – FINANCIAL STATEMENT FINDINGS

NONE NOTED

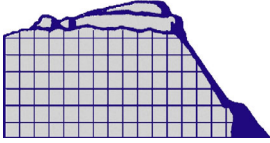
SECTION III - FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

NONE NOTED

SCHEDULE OF PRIOR YEAR FINDINGS AND QUESTIONED COSTS

NONE NOTED

OTHER REPORTS



Paul D. Miller CPA, LLC.

Certified Public Accountant

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

Board of Directors
Clifton Sanitation District
Clifton, CO

I have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the business-type activities of Clifton Sanitation District, as of and for the year ended December 31, 2019, and the related notes to the financial statements, which collectively comprise Clifton Sanitation District's basic financial statements, and have issued my report thereon dated , January 27, 2020.

Internal Control over Financial Reporting

In planning and performing my audit of the financial statements, I considered Clifton Sanitation District's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing my opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Clifton Sanitation District's internal control. Accordingly, I do not express an opinion on the effectiveness of Clifton Sanitation District's internal control.

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 entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

My consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or, significant deficiencies. Given these limitations, during my audit I did not identify any deficiencies in internal control that I consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Clifton Sanitation District's financial statements are free from material misstatement, I performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of my audit, and accordingly, I do not express such an opinion. The results of my tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

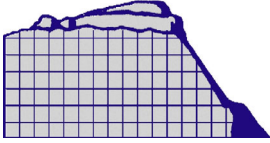
Purpose of this Report

The purpose of this report is solely to describe the scope of my testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Paul D. Miller, CPA, LLC

Grand Junction, CO

January 27, 2020



INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM
AND ON INTERNAL CONTROL OVER COMPLIANCE REQUIRED BY THE UNIFORM GUIDANCE

Board of Directors
Clifton Sanitation District
Clifton, CO

Report on Compliance for Each Major Federal Program

I have audited Clifton Sanitation District's compliance with the types of compliance requirements described in the *Uniform Guidance* that could have a direct and material effect on each of Clifton Sanitation District's major federal programs for the year ended December 31, 2019. Clifton Sanitation District's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with the federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

Auditor's Responsibility

My responsibility is to express an opinion on compliance for each of Clifton Sanitation District's major federal programs based on my audit of the types of compliance requirements referred to above. I conducted my audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). Those standards and the Uniform Guidance require that I plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about Clifton Sanitation District's compliance with those requirements and performing such other procedures, as I considered necessary in the circumstances.

I believe that my audit provides a reasonable basis for my opinion on compliance for each major federal program. However, my audit does not provide a legal determination of Clifton Sanitation District's compliance.

Opinion on Each Major Federal Program

In my opinion, Clifton Sanitation District complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended December 31, 2019.

Report on Internal Control over Compliance

Management of Clifton Sanitation District is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing my audit of compliance, I considered Clifton Sanitation District's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, I do not express an opinion on the effectiveness of Clifton Sanitation District's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

My consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. I did not identify any deficiencies in internal control over compliance that I consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of my testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Paul D. Miller, CPA, LLC

Grand Junction, CO

January 27, 2020