

AUDIT REPORT

**THE HOUSING AND REDEVELOPMENT
COMMISSION OF THE CITY OF
MILBANK, SOUTH DAKOTA**

SEPTEMBER 30, 2010

**HUD ASSISTED PROGRAM
SECTION 8 HOUSING CHOICE VOUCHERS PROGRAM
HUD PROJECT NO. SD037 VO
FEDERAL CFDA NUMBER 14.871**

AUDIT REPORT

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

September 30, 2010

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LARRY A. JERDE, C.P.A.

Certified Public Accountant

INDEPENDENT AUDITOR'S OPINION

The Board of Commissioners
The Housing and Redevelopment Commission
of the City of Milbank, South Dakota
Milbank, South Dakota

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I have audited the accompanying combined financial statements of **The Housing and Redevelopment Commission of the City of Milbank, South Dakota**, as of and for the year ended September 30, 2010, which collectively comprise the Commission's basic financial statements. These financial statements are the responsibility of the Commission's management. My responsibility is to express an opinion on these financial statements based on my audit.

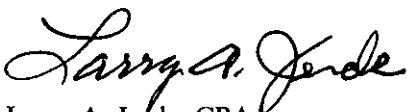
I conducted my audit in accordance with auditing standards generally accepted in the United States of America, and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that I plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes consideration of internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the project's internal control over financial reporting. Accordingly, I do not express such an opinion. An audit also includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements, assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. I believe that my audit provides a reasonable basis for my opinion.

In my opinion, the financial statements referred to above present fairly, in all material respects, the financial position of **The Housing and Redevelopment Commission of the City of Milbank, South Dakota**, as of September 30, 2010, and the results of its operations, changes in net assets and its cash flows for the year then ended, in conformity with accounting principles generally accepted in the United States of America.

In accordance with *Government Auditing Standards*, I have also issued my report dated November 29, 2010, on my consideration of the Commission's internal control over financial reporting and on my tests of its compliance with certain provisions of laws, regulations, contracts, grant agreements and other matters. The purpose of that report is 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 internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of my audit.

The Commission has not presented a Management Discussion and Analysis that the Governmental Accounting Standards Board has determined is necessary to supplement, although not required to be part of the basic financial statements.

My audit was conducted for the purpose of forming an opinion on the September 30, 2010, basic financial statements that collectively comprise **The Housing and Redevelopment Commission of the City of Milbank, South Dakota**. The supporting supplemental financial information, as listed in the table of contents, including the Schedule of Expenditures of Federal Awards, that follows is presented for purposes of additional analysis and is not a required part of the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in my opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.



Larry A. Jerde, CPA
November 29, 2010

COMBINED BALANCE SHEET

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

SECTION 8 HOUSING CHOICE VOUCHERS FUND – AN ENTERPRISE FUND

September 30, 2010

Assets

Cash	<u>\$ 37,455</u>
Total Current Assets	<u>37,455</u>
Equipment, at cost	4,719
Less accumulated depreciation	<u>4,719</u>
	-
Other asset – restricted cash	<u>27,041</u>
Total Assets	<u>\$ 64,496</u>

Liabilities and Net Assets

Accounts payable	<u>\$ 2,635</u>
Total Current Liabilities	<u>2,635</u>
Net Assets	
Restricted – housing assistance payments	27,041
Unrestricted assets	<u>34,820</u>
Total Net Assets	<u>61,861</u>
Total Liabilities and Net Assets	<u>\$ 64,496</u>

See accompanying notes to the financial statements.

**COMBINED STATEMENT OF REVENUES AND EXPENSES
AND CHANGES IN FUND NET ASSETS**

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

SECTION 8 HOUSING CHOICE VOUCHERS FUND – AN ENTERPRISE FUND

Year Ended September 30, 2010

	Revenues	
HUD PHA operating subsidies		\$ 207,452
HUD PHA administration fees		<u>36,067</u>
Total Operating Revenues		<u>243,519</u>
	Expenses	
Housing assistance payments		193,296
Executive director salary		15,000
Payroll taxes		1,223
Health insurance		6,000
Retirement benefits		900
Audit costs		2,635
Office rent		5,640
Office supplies and expenses		3,510
Insurance		100
Telephone		360
Board meetings		<u>159</u>
Total Operating Expenses		<u>228,823</u>
Operating Income		14,696
Nonoperating revenue - interest income		<u>4</u>
Increase in Net Assets		14,700
Net assets, balance beginning of year		<u>47,161</u>
Net assets, balance end of year		<u>\$ 61,861</u>

See accompanying notes to the financial statements.

COMBINED STATEMENT OF CASH FLOWS

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

SECTION 8 HOUSING CHOICE VOUCHERS FUND – AN ENTERPRISE FUND

Year Ended September 30, 2010

CASH FLOWS FROM OPERATING ACTIVITIES:

HUD PHA funding received	\$ 243,519
Cash paid for housing assistance payments	(193,296)
Cash payments to employees for wages	(15,000)
Cash payments to suppliers for goods and services	<u>(20,412)</u>
Net Cash Flows From Operating Activities	<u>14,811</u>

CASH FLOWS FROM INVESTING ACTIVITIES:

Interest received on funds invested	4
Increase in restricted cash	<u>(14,156)</u>
Net Cash Flows Used For Investing Activities	<u>(14,152)</u>

Increase in Cash 659

CASH, beginning of year 36,796

CASH, end of year \$ 37,455

Reconciliation of Operating Income to Net Cash Flows From Operating Activities:

Operating Income	\$ 14,696
Adjustments to Operating Income:	
Changes in operating assets and liabilities:	
Increase in accounts payable	<u>115</u>
Net Cash Flows From Operating Activities	<u>\$ 14,811</u>

See accompanying notes to the financial statements.

NOTES TO THE FINANCIAL STATEMENTS

THE HOUSING AND REDEVELOPMENT COMMISSION OF THE CITY OF MILBANK, SOUTH DAKOTA (a component unit of the city of Milbank, South Dakota)

SECTION 8 HOUSING CHOICE VOUCHERS FUND – AN ENTERPRISE FUND

September 30, 2010

A. Reporting Entity, Nature of Operations and Significant Accounting Policies

1. Description of the Reporting Entity

The financial statements presented in this report represent all the resources and fiscal activities under the control of the Board of Commissioners, a six member governing board, of The Housing and Redevelopment Commission of the City of Milbank, South Dakota. Control is determined by oversight, legal responsibilities, and financial accountability.

The Commission is a component unit of the city of Milbank, South Dakota. The Housing and Redevelopment Commission of the City of Milbank, South Dakota, is a legally separate entity from the city of Milbank, however, a voting majority of the Commission's board is appointed (with approval of) by the city of Milbank. The public housing authority (PHA) board elects its own chairperson and recruits and employs its management personnel.

The majority of the Commission's operating resources come from the United States Department of Housing and Urban Development ("HUD").

The accompanying financial statements have been prepared from records pertaining to and including all the operations, activities and financial affairs of the low rent Section 8 Existing Housing Choice Voucher Fund of the Commission. These financial statements include transactions of the Commission only.

2. Nature of Operations and Organization

The Housing and Redevelopment Commission of the City of Milbank, South Dakota, a public housing authority (PHA), administers a housing program subsidized by the United States Department of Housing and Urban Development. The Commission is engaged in providing housing and housing assistance to very low income individuals and families through a Section 8 Existing Housing Choice Voucher Fund designed to provide decent, safe, affordable and sanitary housing.

The Section 8 Existing Housing Choice Voucher Fund is a HUD federally subsidized housing program designed to assist very low income families in finding in the local market a rental unit suitable for their needs and desires.

NOTES TO THE FINANCIAL STATEMENTS - continued

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

SECTION 8 HOUSING CHOICE VOUCHERS FUND – AN ENTERPRISE FUND

September 30, 2010

The low rent housing program of the Commission is regulated by and follows a uniform system of accounts and accounting procedures as prescribed for this particular program by the United States Department of Housing and Urban Development (HUD); these principles conform to generally accepted accounting principles for an enterprise fund.

If the unit and rental rate are acceptable, the public housing authority (PHA) enters into a housing assistance payments (HAP) contract with the owner of the unit to make up the difference between what the family can afford to pay and the total contracted rent.

HUD housing programs or projects, such as this program, are administered by public housing authorities authorized under state law to operate housing programs within an area or jurisdiction and are regulated by HUD as to rental charges, rental subsidies and operating methods. The Commission receives subsidies from HUD to assist in covering the costs of the Commission's low rent housing programs. The Commission is required to prepare an annual operating budget which is then adopted by the Board of Commissioners.

Low income families who participate in these subsidized or housing assistance programs, tenants of the project, typically pay a portion of their housing costs, this generally amounts to the higher of either thirty (30) percent of their adjusted gross income, based on HUD guidelines, or ten (10) percent of their gross income; the remaining portion of the rent for the units is paid by HUD through public housing assistance payments.

Significant Accounting Policies

3. Fund Accounting

The accounts are organized on the basis of funds, each of which is considered a separate accounting entity. The operations of each fund are accounted for with a separate set of self-balancing accounts that comprise its assets, liabilities, net assets, revenues and expenses. Housing Authority resources are allocated to and accounted for in individual funds based upon the purposes for which they are to be spent and the means by which spending activities are controlled. The Commission's operations are grouped into one broad fund category and one generic fund type as follows:

NOTES TO THE FINANCIAL STATEMENTS - continued

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

SECTION 8 HOUSING CHOICE VOUCHERS FUND – AN ENTERPRISE FUND

September 30, 2010

Business-Type Activities – Proprietary Funds:

The Enterprise Method of Accounting was adopted since costs of the HUD programs are intended to be recovered through federal housing assistance. 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 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 has 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 purposes.

Nonoperating revenue includes interest earnings.

The Commission's financial statements have been prepared in accordance with GASB Statement No. 20, "Accounting and Financial Reporting for Proprietary Funds and Other Governmental Entities that use Proprietary Fund Accounting". The Housing Authority accounts for its activities as proprietary activities in accordance with all applicable GASB pronouncements, as well as pronouncements of the Financial Accounting Standards Board (FASB) and its predecessors issued on or before November 30, 1989, unless those pronouncements conflict with or contradict GASB pronouncements.

For financial reporting purposes, the Section 8 Housing Choice Vouchers Fund (CFDA 14.871) is the only fund of the Commission and major fund for financial reporting purposes.

4. Accounting Estimates and Assumptions

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions in preparing these financial statements that effect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

5. Basis of Accounting and Financial Statement Presentation

The Department of Housing and Urban Development Real Estate Assessment Center (REAC) assesses the financial condition of Public Housing Authorities (PHA's). To uniformly and consistently assess the PHA's, REAC requires that PHA's financial statements conform to Generally Accepted Accounting Principles (GAAP).

NOTES TO THE FINANCIAL STATEMENTS - continued

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

SECTION 8 HOUSING CHOICE VOUCHERS FUND – AN ENTERPRISE FUND

September 30, 2010

The accompanying financial statements are presented on the accrual basis of accounting; revenues are recognized when earned and expenses are recognized when incurred.

The Enterprise Method of accounting was adopted since costs of the HUD programs are intended to be recovered through federal housing assistance.

The financial statement presentation follows the recommendations of the Governmental Accounting Standards Board (GASB). The Commission is required to report information regarding its financial position and activities according to three classes of net assets: invested in capital assets net of related debt, restricted and unrestricted. The current reporting model changes the focus of the financial statements from a focus on fund to a focus on major funds and on government-wide information.

6. Restricted / Unrestricted Net Assets

When expense is incurred for purposes for which both restricted and unrestricted net assets are available, the Commission's policy is to utilize HUD program restricted assets first.

At September 30, 2010, a cash balance of \$27,041 is restricted for Housing Assistance Payments for the Section 8 Housing Choice Vouchers program.

7. Equipment and Depreciation - Capital Assets

Equipment is stated at cost. Depreciation is computed on the straight-line method over three to seven years based on the estimated useful life of individual units. The Commission currently uses a capital asset (equipment) capitalization policy of \$5,000; equipment purchased costing less than this amount is charged as expense to current year operations as supplies.

8. Cash Flows

For purposes of reporting the Statement of Cash Flows, the Commission considers all highly liquid investments with a maturity of three months or less when purchased to be cash equivalents; all cash accounts and unrestricted temporary cash investments at the financial statement reporting date were considered to be cash equivalents.

NOTES TO THE FINANCIAL STATEMENTS - continued

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

SECTION 8 HOUSING CHOICE VOUCHERS FUND – AN ENTERPRISE FUND

September 30, 2010

9. Income Taxes

The Commission is a governmental entity exempt from federal income taxes, therefore, no provision for income taxes has been presented in the accompanying financial statements. The State of South Dakota does not have an income tax.

B. Equipment - Capital Assets

A summary of changes in equipment during the year follows:

	<u>Equipment</u>	<u>Accumulated Depreciation</u>
Beginning balance, September 30, 2009	\$ 4,719	\$ 4,719
Provision for depreciation expense	-	-
Balance, September 30, 2010	<u>\$ 4,719</u>	<u>\$ 4,719</u> (fully depreciated)

C. Retirement Plan

The fiscal year ended September 30, 2005, was the first year that the employee of the Housing and Redevelopment Commission of the City of Milbank, South Dakota, began participating in the South Dakota Retirement System (SDRS), a cost-sharing, multiple employer public employee retirement system established to provide retirement benefits for employees of the State of South Dakota and its political subdivisions. The SDRS provides retirement, disability and survivor benefits. The right to receive retirement benefits vest after three years of credited service. Authority for establishing, administering and amending plan provisions are found in South Dakota Codified Law 3-12.

The SDRS issues a publicly available financial report that includes financial statements and required supplementary information. That report may be obtained by writing to the SDRS, PO Box 1098, Pierre, South Dakota 57501.

Under this plan, the employer matches (the employer is required by statute to contribute an amount equal to the employee's contribution) the employee's six percent of compensation contribution, which is currently funded.

The Commission's share of contributions (cost of the retirement plan) made to the SDRS for the years ended September 30, 2010, 2009 and 2008 were \$900, \$870 and \$744, respectively.

NOTES TO THE FINANCIAL STATEMENTS - continued

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

SECTION 8 HOUSING CHOICE VOUCHERS FUND – AN ENTERPRISE FUND

September 30, 2010

D. Deposits and Investments - Risk Concentrations

The Commission's deposits are made and held in qualified public depositories. In South Dakota, qualified depositories are required by SDCL 4-6A-3 to maintain at all times, segregated from their other assets, eligible collateral having a value equal to at least 100 percent of the public deposit accounts which exceed deposit insurance such as the FDIC and NCUA.

The Commission maintains its cash accounts at a financial institution in the general local area. All of the Commission's bank balances were held in accounts fully insured by the Federal Deposit Insurance Corporation (FDIC) at September 30, 2010.

All cash balances, including interest earned where applicable, have market values at September 30, 2010, that are the same as the carrying value in the accompanying financial statements.

Management maintains a continuing consciousness trying to minimize credit risk concentrations, the Commission maintains cash in public depositories which are federally insured; the Commission has not experienced any losses in such accounts. Upon reinvestment or renewal of invested cash balances, management uses investment policies that result in cash balances with individual financial institutions being below the FDIC and NCUA insured thresholds or limits.

E. Risk Management

Liability and casualty insurance are carried for risks of loss related to torts, theft of, or damage to property; and errors and omissions of public officials through a commercial insurance carrier. The Commission provides coverage for unemployment benefits by contributing to the State of South Dakota Unemployment Fund.

The Commission does not carry workers compensation insurance.

SUPPLEMENTAL FINANCIAL INFORMATION

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

Year Ended September 30, 2010

Federal Grantor - U.S. Department of Housing and Urban Development

Direct Federal Financial Assistance

Federal CFDA Number - Very Low Income Housing
Assistance program - 14.871
Section 8 Housing Choice Vouchers Fund

\$ 243,519

Total Federal Funding Expenditures

\$ 243,519

The above figures represent the federal financial assistance earned, as federal financial assistance is used as general support for the Commission's low rent housing assistance program and is reported in accordance with generally accepted accounting principles.

**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
GOVERNMENTAL AUDITING STANDARDS**

The Board of Commissioners
The Housing and Redevelopment Commission
of the City of Milbank, South Dakota
Milbank, South Dakota

I have audited the financial statements of **The Housing and Redevelopment Commission of the City of Milbank, South Dakota**, as of and for the year ended September 30, 2010, and have issued my opinion thereon dated November 29, 2010. I conducted my audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Governmental Auditing Standards*, issued by the Comptroller General of the United States.

Internal Control Over Financial Reporting

In planning and performing my audit, I considered the Commission's internal control over financial reporting as a basis for designing my audit procedures for the purpose of expressing my opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Commission's internal control over financial reporting. Accordingly, I did not express an opinion on the effectiveness of the Commission's internal control over financial reporting.

My consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. However, as discussed below, I identified certain deficiencies in internal control over financial reporting that we consider to be significant deficiencies.

A control deficiency 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 misstatements on a timely basis. A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the Commission's ability to initiate, authorize, record, process or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the Commission's financial statements that is more than inconsequential will not be prevented or detected by the Commission's internal control. I consider the deficiency described in 10-1 in the accompanying Schedule of Audit Findings to be a significant deficiency in internal control over financial reporting.

A material weakness is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the Commission's internal control.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Commission's financial statements are free of 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 and other matters that are required to be reported under *Government Auditing Standards*.

This report is intended solely for the information and use of the Board of Commissioners, management and the United States Department of Housing and Urban Development and is not intended to be and should not be used by anyone other than these specified parties. However, as required by South Dakota Codified Law 4-11-11, this report is a matter of public record and its distribution is not limited.

A handwritten signature in cursive script that reads "Larry A. Jerde".

Larry A. Jerde, CPA
November 29, 2010

SCHEDULE OF AUDIT FINDINGS - continued

THE HOUSING AND REDEVELOPMENT COMMISSION OF THE CITY OF MILBANK, SOUTH DAKOTA (a component unit of the city of Milbank, South Dakota)

September 30, 2010

B. FINDINGS – FINANCIAL STATEMENT AUDIT

Material Weaknesses

AUDIT FINDING 10-1 Lack of Segregation of Duties in Certain Duties Due to a Limited Staff

Condition: The Commission does not have an internal control system designed to provide adequate segregation of duties in the accounting function due to a limited number of staff.

Criteria: A good system of internal accounting control requires an adequate segregation of duties so that no one individual has incompatible duties or responsibilities. No one person should have more than one duty relating to the authorization (approval), custody of assets (check signers), record keeping and reconciliation functions. The system should have enough controls so that no one person handles a transaction from beginning to the end.

Effect: The control deficiency could result in a misstatement to the financial statements that would not be detected or prevented in the normal course of business. The control deficiency also could result in unauthorized transactions, misappropriation or loss of assets.

Cause: The Commission could have unauthorized, preventable transactions entered into the accounting system that would not be detected in the normal operations of the entity.

Recommendations: The circumstance is not unusual for an organization of this size. While we recognize that your staff may not be large enough in number to permit complete segregation of duties in all material respects for an effective system of internal control, the functions should be reviewed to determine if additional segregation of duties is feasible and to improve the efficiency and effectiveness of financial management and financial accuracy for the Commission. Segregation of authorization, custody of assets, record keeping and reconciliation functions would assist in mitigating the risk of fraud or misstatements to the financial statements. It is the responsibility of management and those charged with governance to make the decision whether to accept the degree of risk associated with this condition because of added costs or other considerations.

Management's Response: Due to additional costs, the Commission will continue to keep the staff at the same level. The Commission will document in the board minutes the involvement of the Commissioners in the approval of receipts and disbursements, review of budget, and the management decision-making process.

SCHEDULE OF AUDIT FINDINGS - continued

**THE HOUSING AND REDEVELOPMENT COMMISSION
OF THE CITY OF MILBANK, SOUTH DAKOTA
(a component unit of the city of Milbank, South Dakota)**

September 30, 2010

Corrective Action Plan (CAP)

1. Actions Planned in Response to the Finding: No action other than better documentation is planned on the finding. The Commission feels that the additional costs would not be significantly beneficial. The Commission does mitigate some of this situation through the Fee Accountant doing reconciliations and the Commissioners involved in the review and approval of the receipts and disbursements, review of the budget and the management decision making process.
2. Explanation of Disagreement: There is no disagreement with the audit finding.
3. Official Responsible for Ensuring Corrective Action: Donna Gregory, Executive Director.
4. Planned Completion Date for the Corrective Action: 2010 board meetings.
5. Plan to Monitor Completion of Corrective Action: Board of Commissioners will monitor.