

**HUMBOLDT COUNTY ASSOCIATION
OF GOVERNMENTS**

**COMMUNICATION WITH THOSE CHARGED
WITH GOVERNANCE AND MANAGEMENT LETTER**

**FOR THE YEAR ENDED
June 30, 2024**

**COMMUNICATION WITH THOSE CHARGED
WITH GOVERNANCE AND MANAGEMENT LETTER**

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Board of Directors
Humboldt County Association of Governments
Eureka, California

In planning and performing our audit of the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of the Humboldt County Association of Governments (HCAOG) as of and for the year ended June 30, 2024, in accordance with auditing standards generally accepted in the United States of America, we considered HCAOG's internal control over financial reporting (internal control) as a basis for designing auditing procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of HCAOG's internal control. Accordingly, we do not express an opinion on the effectiveness of HCAOG's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed later in this letter, we identified certain deficiencies in internal control that we consider to be significant deficiencies.

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. We did not identify any deficiencies in internal control that we consider to be material weaknesses.

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. We consider certain of the items discussed later in this letter to be significant deficiencies.

In addition, during our audit, we noted certain matters involving the internal control structure and other operational matters that are presented for your consideration. We will review the status of these comments during our next audit engagement. Our comments and recommendations, all of which have been discussed with appropriate members of management, are not intended to be all-inclusive, but rather represent those matters that we considered worthy of your consideration. We will be pleased to discuss these comments in further detail at your convenience, to perform any additional study of these matters, or to assist the Humboldt County Association of Governments in implementing the recommendations.

Board of Directors
Humboldt County Association of Governments
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This communication is intended solely for the information and use of management, the Board of Directors, others within the organization and officials of the federal and state grantor agencies and should not be used by anyone other than these specified parties.

We thank the Humboldt County Association of Government's staff for its cooperation during our audit.

Anderson, Lucas, Somerville, & Borges
Fortuna, California
March 17, 2025

REQUIRED COMMUNICATION WITH THOSE CHARGED WITH GOVERNANCE

We have audited the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of the Humboldt County Association of Governments (HCAOG) for the year ended June 30, 2024. Professional standards require that we provide you with information about our responsibilities under generally accepted auditing standards, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our letter to you dated September 16, 2024. Professional standards also require that we communicate to you the following information related to our audit.

Significant Audit Findings

Qualitative Aspects of Accounting Practices

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by the Humboldt County Association of Governments are described in Note 2 to the financial statements. No new accounting policies were adopted and the application of existing policies was not changed during the year. We noted no transactions entered into by the Humboldt County Association of Governments during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the financial statements in the proper period.

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. We evaluated the key factors and assumptions used to develop any accounting estimates in determining that they were reasonable in relation to the financial statements taken as a whole. No significant estimates were encountered during the audit.

The disclosures in the financial statements are neutral, consistent and clear. We noted no disclosures that were considered sensitive because of their significance to the financial statement users.

Difficulties Encountered in Performing the Audit

We encountered no significant difficulties in dealing with management in performing and completing our audit.

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. Management has corrected all such misstatements. In addition, none of the uncorrected misstatements detected as a result of audit procedures were material, either individually or in the aggregate, to each opinion unit's financial statements taken as a whole.

Board of Directors
Humboldt County Association
of Governments
March 17, 2025

Disagreements with Management

For purposes of this letter, a disagreement with management is a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditors' report. We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations

We have requested certain representations from management that are included in the management representation letter dated January 27, 2025

Management Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the Humboldt County Association of Governments' financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

Other Audit Findings or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Humboldt County Association of Governments auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

Other Matters

We were engaged to report on the supplemental information included as Schedules 1-7 on pages 30-36, which accompany the financial statements but are not RSI (required supplementary information). With respect to this supplementary information, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with accounting principles generally accepted in the United States of America, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

This information is intended solely for the use of the Board of Directors of the Humboldt County Association of Governments and its management and is not intended to be, and should not be, used by anyone other than these specified parties.

MANAGEMENT COMMENTS AND RECOMMENDATIONS

PRIOR YEAR RECOMMENDATIONS

Transportation Development Act Fund Eligibility

As part of our compliance testing of the various transit claimants, we reviewed eligibility for funds as calculated under Article 4, Section 6634(a) of the California Administrative Code. For the prior fiscal years, the following claimants were determined to have received excess operational TDA funds:

	<u>6/30/22</u>	<u>6/30/23</u>
City of Arcata-General Services	\$ -	\$182,669

In accordance with the rules and regulations of the Transportation Planning Agency, these items are required to be adjusted on a succeeding year's TDA claim. They can also be re-identified as monies claimed for capital purchases if sufficient reserves have been used to help purchase new capital assets

Corrective actions have not yet been reflected in any LTF claims filed through the June 30, 2024-2025 fiscal year.

LTF Claimant Balances

Generally, the county Auditor-Controller's office tracks the allocated and apportioned balance in the Local Transportation Fund (LTF) by the individual claimant (City, County, RTPA). This included the periodic interest allocations as well as the TDA fund revenues and disbursements.

During the last fiscal period, this level of tracking detail was not able to be provided. As those balances are integral to the various claimants in determining the available funds for claiming and spending their TDA monies, this tracking detail update should be done as soon as possible. Staff informs us that this process was recently completed and updated to reflect current balances.

HCAOG personnel have now taken on this task of monitoring and updating the LTF fund balances by entity on a regular and current basis.

PRIOR YEAR RECOMMENDATIONS - Continued

Greyhound Bus Program - City of Arcata

During various prior years, the Greyhound program operated at a loss. In order to track whether TDA funds have been used to subsidize this program, the City established the portion of the fund balance which related to prior year surpluses generated by the Greyhound program, as well as other non-TDA revenue sources.

During the years ended up through June 30, 2024, the program operated at a cumulative deficit of \$140,073. The City needed to evaluate and review their earlier expenditure allocations to this program. Alternatively, they would need to consider subsidies from other funds or sources in order to offset the current deficit.

The City has recently reviewed and evaluated their expenditure allocations to this program used in prior years. The methodology used prior to June 30, 2021 was determined to have been inappropriate and was not evaluated regularly. A revision of such labor allocation has recently been prepared based on the supportable time properly chargeable to the Greyhound program. Such revision has identified approximately \$192,000 in excess labor costs that had been allocated to this program in years prior to 2021. With these modifications, the cumulative deficit noted above would be eliminated and no further tracking or adjustments are needed.

We have reviewed the City's methodology details and documentation relating to this re-allocation of costs and are satisfied that this is an appropriate calculation of these specific excess expenses charges to the Greyhound program during those years.

Further, the calculations relating to annual Fund Eligibility and Farebox Recovery Ratios compliance were determined to not have been negatively impacted by these changes.

Fare Box Recovery Ratio - City of Fortuna

As part of our compliance testing of the various transit claimants, we reviewed the farebox recovery ratio as calculated under Article 4, Section 6633.5 of the California Administrative Code. This requirement compares the portion of the system operating costs which are recovered through the recorded transit fare revenues. For the year ended June 30, 2020, the City of Fortuna did not meet its required Fare Box Recovery Ratio for Specialized Transit services. The ratio achieved was 9.95% rather than the required 10%. In accordance with Code Section 6633.9(a), the year ended June 30, 2020 was considered the one time grace year, and no eligibility recalculations were required.

For the years ended June 30, 2021, 2022, and 2023, the City of Fortuna did not meet its required Fare Box Recovery Ratio for Specialized Transit services. The ratios achieved were 6.77%, 5.59% and 6.09% respectively, rather than the required 10%. In accordance with recently enacted COVID relief provisions, noncompliance penalties relating to the years ended June 30, 2021, 2022, and 2023 were waived, and no eligibility recalculations were required.

PRIOR YEAR RECOMMENDATIONS - Continued

Claimant Filing Responsibilities and Deadlines

Claimants requesting an allocation from the Local Transportation Fund should file a claim the Transportation Planning Agency in accordance with the Rules and Regulations established by the TPA pursuant to Public Utilities Code section 99261. Unless otherwise adopted, this required filing date is generally April 1 of each year, for claims for funds for the subsequent fiscal year.

Most of the local claimants regularly do not meet this deadline.

Under the TDA Code guidelines, HCAOG can establish its own annual filing date for the annual LTF claim submissions as part of its rules and regulations. We recommend a formal change in this policy so that the required filing date is more in line with the entities receipt and timing of information and budgetary processes to submit a meaningful claim and be in compliance with this Code section.

Annual TDA Claimant Audit

Section 6664 of the California Administrative Code requires an annual audit of each claimant of TDA funds during the year. These audits are due by December 31st each year, with an allowable 90 day extension if requested by the responsible entity. No allocation of TDA funds shall be made to any claimant that is delinquent in its submission of fiscal and compliance audit report.

The City of Arcata and Humboldt Transit Authority did not complete the required audit as of the previous year's extended March 31, 2024 deadline. The audits for the year ended June 30, 2023 were completed and submitted prior to June 30, 2024.

CURRENT YEAR COMMENTS AND RECOMMENDATIONS

Transportation Development Act Fund Eligibility

As part of our compliance testing of the various transit claimants, we reviewed eligibility for funds as calculated under Article 4, Section 6634(a) of the California Administrative Code. For the year ended June 30, 2024 the following claimants were determined to have received excess operational TDA funds:

	<u>6/30/2024</u>
City of Fortuna-Specialized Services	\$48,077
City of Arcata-General Services	\$40,711

In accordance with the rules and regulations of the Transportation Planning Agency, these items are required to be adjusted on a succeeding year's TDA claim. They can also be re-identified as monies claimed for capital purchases if sufficient reserves have been used to help purchase new capital assets.

Board of Directors
Humboldt County Association
of Governments
March 17, 2025

Fare Box Recovery Ratio - City of Fortuna

As part of our compliance testing of the various transit claimants, we reviewed the farebox recovery ratio as calculated under Article 4, Section 6633.5 of the California Administrative Code. This requirement compares the portion of the system operating costs which are recovered through the recorded transit fare revenues. For the year ended June 30, 2024, the City of Fortuna did not meet its required Fare Box Recovery Ratio for Specialized Transit services. The ratio which was achieved was 7.03% rather than the required 10%. The revenue shortfall was \$6,864.

In accordance with the enacted COVID relief provisions under AB 90 and subsequent legislation, noncompliance penalties relating to the year ended June 30, 2024 were waived, and no eligibility recalculations are required.

Annual TDA Claimant Audit

Section 6664 of the California Administrative Code requires an annual audit of each claimant of TDA funds during the year. These audits are due by December 31st each year, with an allowable 90 day extension if requested by the responsible entity. No allocation of TDA funds shall be made to any claimant that is delinquent in its submission of fiscal and compliance audit report.

One of the claimants did not have the required audits completed as of the extended March 31, 2025 deadline. HCAOG is the responsible entity for ensuring such compliance and will be required to withhold any future transit related funds until such audits have been completed and submitted.

The previous comments, observations and recommendation are meant to be constructive suggestions on ways to improve the procedures and policies of the entities named in the first paragraph of this letter. It is not intended to be all-inclusive of the areas where improvements might be achieved. Should you have any questions regarding these comments or any other matters, please contact us.

In conclusion, we would like to thank the personnel of the Humboldt County Association of Governments, the Humboldt County Auditor's staff, and the respective employees of the various claimants for their help and assistance during the course of our audit.

Very sincerely,

ANDERSON, LUCAS, SOMERVILLE & BORGES, LLP