

June 25, 2018

Mr. Jon Fernandez
Superintendent
Guam Department of Education
P.O. Box DE
Hagatna, GU 96932

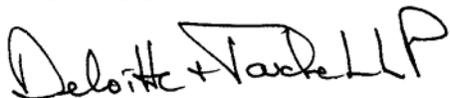
We have performed an audit of the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of the Guam Department of Education (GDOE) as of and for the year ended September 30, 2017, in accordance with auditing standards generally accepted in the United States of America ("generally accepted auditing standards") and have issued our report thereon dated June 25, 2018.

We have prepared the following comments to assist you in fulfilling your obligation to oversee the financial reporting and disclosure process for which management of GDOE is responsible.

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

We wish to thank the staff and management of GDOE for their cooperation and assistance during the course of this engagement.

Very truly yours,

A handwritten signature in black ink that reads "Deloitte + Touche LLP". The signature is written in a cursive, stylized font.

cc: The Management of the Guam Department of Education

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

Our responsibility under generally accepted auditing standards and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, have been described in our engagement letter dated August 3, 2017. As described in that letter, the objective of a financial statement audit conducted in accordance with the aforementioned standards are:

- To express opinions on the fairness of GDOE's respective financial statements and the accompanying supplementary information, in relation to the financial statements as a whole, for the year ended September 30, 2017 (the "financial statements"), in accordance with accounting principles generally accepted in the United States of America ("generally accepted accounting principles") in all material respects, and to perform specified procedures on the required supplementary information for the year ended September 30, 2017;
- To express an opinion on whether the supplementary information that accompanies the financial statements, including the schedule of expenditures of federal awards, is presented fairly, in all material respects, in relation to the financial statements as a whole;
- To report on GDOE's internal control over financial reporting and on its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters for the year ended September 30, 2017, based on an audit of financial statements performed in accordance with the standards applicable to financial audits contained in *Government Auditing Standards*; and
- To report on GDOE's compliance with requirements applicable to each major program and on internal control over compliance in accordance with the Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (the "*Uniform Guidance*").

Our responsibilities under generally accepted auditing standards include forming and expressing an opinion about whether the financial statements that have been prepared with the oversight of management and the Office of the Superintendent are presented fairly, in all material respects, in conformity with generally accepted accounting principles. The audit of the financial statements does not relieve management or the Office of the Superintendent of their responsibilities.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on our judgment, including the assessment of the risks of material misstatement of the financial statements, whether caused by fraud or error. In making those risk assessments, we considered internal control over financial reporting relevant to GDOE's preparation and fair presentation of the financial statements in order to design audit procedures that were appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of GDOE's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of GDOE's internal control over financial reporting. Our consideration of internal control over financial reporting was not designed to identify all deficiencies in internal control over financial reporting that might be significant deficiencies or material weaknesses.

We also considered GDOE's internal control over compliance with requirements that could have a direct and material effect on a major federal program in order to determine our auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with the Uniform Guidance. Our audit does not, however, provide a legal determination of GDOE's compliance with those requirements.

ACCOUNTING ESTIMATES

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's current judgments. Those judgments are normally based on knowledge and experience about past and current events and on assumptions about future events. No significant accounting estimates were reflected in GDOE's 2017 financial statements.

AUDIT ADJUSTMENTS AND UNCORRECTED MISSTATEMENTS

Our audit of the financial statements was designed to obtain reasonable, rather than absolute, assurance about whether the financial statements are free of material misstatement, whether caused by error or fraud. As the result of our audit work, we identified matters that resulted in audit adjustments that we believe, either individually or in the aggregate, would have a significant effect on GDOE's financial reporting process. Such proposed adjustments, listed in Attachment I, have been recorded in the accounting records and are reflected in the 2017 financial statements.

In addition, we have attached to this letter, as Appendix A to Attachment II, summaries of uncorrected misstatements aggregated by us during the current engagement and pertaining to the latest period presented that were determined by management to be immaterial, both individually and in the aggregate, to the financial statements taken as a whole.

SIGNIFICANT ACCOUNTING POLICIES

GDOE's significant accounting policies are set forth in Note 1 to GDOE's 2017 financial statements. During the year ended September 30, 2017, there were no significant changes in previously adopted accounting policies or their application, except as follows:

During the year ended September 30, 2017, GDOE implemented the following pronouncements:

- GASB Statement No. 73, *Accounting and Financial Reporting for Pensions and Related Assets That Are Not Within the Scope of GASB Statement 68, and Amendments to Certain Provisions of GASB Statements 67 and 68*, which aligns the reporting requirements for pensions and pension plans not covered in GASB Statements 67 and 68 with the reporting requirements in Statement 68. The implementation of this statement has no impact on GDOE's governmental fund financial statements, which continue to report expenditures in the amount statutorily required. However, implementation has resulted in the restatement of GDOE's government-wide financial statements to reflect the reporting of net pension liabilities, deferred inflows of resources and deferred outflows of resources for certain ad hoc COLA and supplemental annuity payments and the recognition of pension expense in accordance with the provisions of GASB Statement No. 73. The government-wide financial statements were also restated due to changes in actuarial assumptions and other inputs used to determine net pension liabilities, deferred inflows of resources and deferred outflows of resources for the qualified defined benefit pension plan.

Net pension as of October 1, 2016 for governmental activities decreased by \$86,736,928 as a result of the implementation of GASB Statement No. 73 and the change in actuarial assumptions and other inputs. Refer to Note 5 for more information regarding GDOE's pensions.

- GASB Statement No. 74, *Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans*, which replaces Statements No. 43, *Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans, as amended*, and No. 57, *OPEB Measurements by Agent Employers and Agent Multiple-Employer Plans*, and addresses financial reporting requirements for governments whose employees are provided with postemployment benefits other than pensions (other postemployment benefits or OPEB).
- GASB Statement No. 77, *Tax Abatement Disclosures*, which requires governments that enter into tax abatement agreements to disclose certain information about the agreements.

SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

- GASB Statement No. 78, *Pensions Provided through Certain Multiple-Employer Defined Benefit Pension Plans*, which addresses a practice issue regarding the scope and applicability of Statement No. 68, *Accounting and Financial Reporting for Pensions*.
- GASB Statement No. 80, *Blending Requirements for Certain Component Units - an amendment of GASB Statement No. 14*, which improves financial reporting by clarifying the financial statement presentation requirements for certain component units.
- GASB Statement No. 82, *Pension Issues - an amendment of GASB Statements No. 67, No. 68, and No. 73*, which addresses issues regarding (1) the presentation of payroll-related measures in required supplementary information, (2) the selection of assumptions and the treatment of deviations from the guidance in an Actuarial Standard of Practice for financial reporting purposes, and (3) the classification of payments made by employers to satisfy employee (plan member) contribution requirements.

Except for GASB Statement No. 73, the implementation of these statements did not have a material effect on the GDOE's financial statements.

In June 2015, GASB issued Statement No. 75, *Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions*, which replaces the requirements of Statement No. 45, *Accounting and Financial Reporting by Employers for Postemployment Benefits Other Than Pensions*, as amended, and No. 57, *OPEB Measurements by Agent Employers and Agent Multiple-Employer Plans*, and provides guidance on reporting by governments that provide OPEB to their employees and for governments that finance OPEB for employees of other governments. The provisions in Statement No. 75 are effective for fiscal years beginning after June 15, 2017. Based on an actuarial valuation dated October 1, 2015, the net OPEB obligation that GDOE will record upon implementation of Statement 75 is anticipated to be \$360,793,746 as of September 30, 2017.

In March 2016, GASB issued Statement No. 81, *Irrevocable Split-Interest Agreements*, which improves accounting and financial reporting for irrevocable split-interest agreements by providing recognition and measurement guidance for situations in which a government is a beneficiary of the agreement. The provisions in Statement No. 81 are effective for fiscal years beginning after December 15, 2016. Management does not believe that the implementation of this statement will have a material effect on the financial statements.

In November 2016, GASB issued Statement No. 83, *Certain Asset Retirement Obligations*, which addresses accounting and financial reporting for certain asset retirement obligations (AROs) associated with the retirement of a tangible capital asset. The provisions in Statement No. 83 are effective for fiscal years beginning after June 15, 2018. Management does not believe that the implementation of this statement will have a material effect on the financial statements.

In January 2017, GASB issued Statement No. 84, *Fiduciary Activities*, which establishes criteria for identifying fiduciary activities of all state and local governments. The provisions in Statement No. 84 are effective for fiscal years beginning after December 15, 2018. Management does not believe that the implementation of this statement will have a material effect on the financial statements.

In March 2017, GASB issued Statement No. 85, *Omnibus 2017*, which address practice issues that have been identified during implementation and application of certain GASB Statements including issues related to blending component units, goodwill, fair value measurement and application, and postemployment benefits (pensions and other postemployment benefits). The provisions in Statement No. 85 are effective for fiscal years beginning after June 15, 2017. Management does not believe that the implementation of this statement will have a material effect on the financial statements.

SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

In May 2017, GASB issued Statement No. 86, *Certain Debt Extinguishment Issues*, which improves consistency in accounting and financial reporting for in-substance defeasance of debt. The provisions in Statement No. 86 are effective for fiscal years beginning after June 15, 2017. Management does not believe that the implementation of this statement will have a material effect on the financial statements.

In June 2017, GASB issued Statement No. 87, *Leases*, which establishes a single model for lease accounting based on the foundational principle that leases are financings of the right to use an underlying asset. The provisions in Statement No. 87 are effective for fiscal years beginning after December 15, 2019. Management has yet to determine whether the implementation of this statement will have a material effect on the financial statements.

OTHER INFORMATION IN THE ANNUAL REPORTS OF GDOE

When audited financial statements are included in documents containing other information such as GDOE's 2017 Annual Report, we will read such other information and consider whether it, or the manner of its presentation, is materially inconsistent with the information, or the manner of its presentation, in the financial statements audited by us. We will read the other information in GDOE's 2017 Annual Report and will inquire as to the methods of measurement and presentation of such information. If we note a material inconsistency or if we obtain any knowledge of a material misstatement of fact in the other information, we will discuss this matter with management and, if appropriate, with the Board.

DISAGREEMENTS WITH MANAGEMENT

We have not had any disagreements with management related to matters that are material to GDOE's 2017 financial statements.

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

We are not aware of any consultations that management may have had with other accountants about auditing and accounting matters during 2017.

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

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

OTHER SIGNIFICANT FINDINGS OR ISSUES ARISING FROM THE AUDIT DISCUSSED, OR SUBJECT OF CORRESPONDENCE, WITH MANAGEMENT

Throughout the year, routine discussions were held, or were the subject of correspondence, with management. In our judgment, such discussions or correspondence did not involve significant findings or issues requiring communication to GDOE.

SIGNIFICANT DIFFICULTIES ENCOUNTERED IN PERFORMING THE AUDIT

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

MANAGEMENT'S REPRESENTATIONS

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

CONTROL-RELATED MATTERS

We have issued a separate report to you, dated June 25, 2018, on the GDOE's internal control over financial reporting and on its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters, which was based upon the audit performed in accordance with *Government Auditing Standards*. We have also issued a separate report to you, also dated June 25, 2018, involving the GDOE's compliance with requirements applicable to each major program and on internal control over compliance in accordance with the Uniform Guidance. Within those reports, we noted certain matters that were considered to be material weaknesses and significant deficiencies under standards established by the American Institute of Certified Public Accountants and the Uniform Guidance. Although we have included management's written responses to our comments contained in those reports, such responses have not been subjected to the auditing procedures applied on our audit of the basic financial statements and, accordingly, we do not express an opinion or provide any form of assurance on the appropriateness of the responses or the effectiveness of any corrective actions described therein.

We have communicated to management, in separate letters also dated June 25, 2018, certain deficiencies and other matters related to the GDOE's internal control over financial reporting and the information technology environment that we identified during our audit.

**Guam Department of Education
Summary of Corrected Misstatements
September 30, 2017**

GENERAL FUND**Journal Entries - AJE**

#	Name	Debit	Credit
	1 AJE To record capital lease acquisition		
Capital Lease Acq	CAPITAL LEASE AQUISITION	26,995,762	-
Capital Lease	CAPITAL LEASE	-	26,995,762
		<u>26,995,762</u>	<u>26,995,762</u>

GOVERNMENT WIDE

#	Name	Debit	Credit
	1 AJE To restate pension liability-GASB 68 and 73		
820-270000	DEFERRED OUTFLOWS OF RESOURCES	5,751,076	-
820-270002	DEFERRED OUTFLOWS OF RESOURCES-DC COLA	1,009,906	-
820-270001	DEFERRED OUTFLOWS OF RESOURCES-DB COLA/SA	7,217,641	-
820-370000	NET PENSION LIABILITY	-	19,855,287
820-370001	NET PENSION LIABILITY-DB COLA/SA	-	67,420,706
820-370002	NET PENSION LIABILITY-DC COLA	-	13,924,782
820-371502	DEFERRED INFLOWS OF RESOURCES-DC COLA	-	147,861
820-371501	DEFERRED INFLOWS OF RESOURCES-DB COLA/SA	-	208,927
820-370200	PENSION EXPENSE	28,567,506	-
820-370100	AMT TO BE PROVIDED-NET PENSION	59,011,434	-
		<u>101,557,563</u>	<u>101,557,563</u>

	2 AJE To adjust net pension liability for FY2017		
820-270000	DEFERRED OUTFLOWS OF RESOURCES	-	17,338,622
820-270001	DEFERRED OUTFLOWS OF RESOURCES-DB COLA/SA	-	425,447
820-270002	DEFERRED OUTFLOWS OF RESOURCES-DC COLA	1,993,271	-
820-370000	NET PENSION LIABILITY	15,104,230	-
820-370001	NET PENSION LIABILITY-DB COLA/SA	2,162,222	-
820-370002	NET PENSION LIABILITY-DC COLA	-	2,322,852
820-371500	DEFERRED INFLOWS OF RESOURCES	-	3,520,672
820-371501	DEFERRED INFLOWS OF RESOURCES-DB COLA/SA	124,479	-
820-371502	DEFERRED INFLOWS OF RESOURCES-DC COLA	147,861	-
820-370200	PENSION EXPENSE	4,075,530	-
		<u>23,607,593</u>	<u>23,607,593</u>

	3 AJE To reconcile capital leases		
820-380100	AMT TO BE PROVIDED-C.LEASE	16,836,750	-
820-380300	CAPITAL LEASE -CURRENT	-	586,456
820-380200	CAPITAL LEASE-LONG TERM	-	15,589,461
820-280400	DEFERRED MAINT. COST	-	125,000
820-280300	PREPAYMENT-CAPITAL LEASE	-	535,833
		<u>16,836,750</u>	<u>16,836,750</u>

	4 AJE To adjust sick leave and compensated absences		
820-340300	ACCRUED ANNUAL LEAVE-CURR	241,507	-
820-340700	ACCRUED ANNUAL LEAVE-LT	-	149,200
820-381300	DEF.CONTRIB.RETIRE/SICK	-	460,052
820-381200	EMPLOYEE BENEFITS	367,745	-
		<u>609,252</u>	<u>609,252</u>

	5 AJE To record and adjust Tiyan Buildings		
810-251500	ACCUM. DEPR-BUILDINGS	23,335	-
810-251000	FIXED ASSETS-BUILDINGS	26,704,076	-
810-041530	BUDGETARY FUND BALANCE	-	26,727,412
		<u>26,727,412</u>	<u>26,727,412</u>



JON J. P. FERNANDEZ
Superintendent of Education

DEPARTMENT OF EDUCATION OFFICE OF THE SUPERINTENDENT

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June 25, 2018

Deloitte & Touche, LLP
361 South Marine Corps Drive
Tamuning, GU 96913-3973

Dear Deloitte & Touche, LLP,

We are providing this letter in connection with your audit of the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of the Guam Department of Education (GDOE), a line agency of the Government of Guam (GovGuam), as of and for the year ended September 30, 2017, which collectively comprise GDOE's basic financial statements for the purpose of expressing an opinion as to whether the basic financial statements present fairly, in all material respects, the financial position, results of operations or changes in fund balances, and cash flows, as applicable, of GDOE in accordance with accounting principles generally accepted in the United States of America (GAAP).

We confirm that we are responsible for the following:

- a. The preparation and fair presentation in the basic financial statements of financial position of the governmental activities, each major fund, and the aggregate remaining fund information, in accordance with GAAP.
- b. The design, implementation, and maintenance of internal control:
 - Relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.
 - To prevent and detect fraud.
- c. The review and approval of the financial statements and related notes and acknowledge your role in the preparation of this information. Specifically, we acknowledge that your role in the preparation of the financial statements was a matter of convenience rather than one of necessity. We have reviewed the financial statement preparation assistance provided by you and acknowledge that the financial statements are prepared in accordance with GAAP. Our review was based on the use of the financial statement disclosure checklist for general purpose financial statements obtained from the Governmental Finance Officers Association.

Certain representations in this letter are described as being limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement.

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

1. The basic financial statements referred to above are fairly presented in accordance with GAAP. In addition:
 - a. The financial statements include all component units as well as joint ventures with an equity interest, and properly disclose all other joint ventures and other related organizations.
 - b. Net position components (net investment in capital assets; restricted; and unrestricted) are properly classified and, if applicable, approved.
 - c. Deposits and investment securities are properly classified in the category of custodial credit risk.
 - d. Capital assets, including infrastructure assets, are properly capitalized, reported, and, if applicable, depreciated.
 - e. Required supplementary information is measured and presented within prescribed guidelines.
 - f. Applicable laws and regulations are followed in adopting, approving, and amending budgets.
 - g. The financial statements properly classify all funds and activities, including special and extraordinary items.
 - h. All funds that meet the quantitative criteria in the GASB Codification of Government Accounting and Financial Reporting Standards Section 2200.159 for presentation as major are identified and presented as such and all other funds that are presented as major are particularly important to financial statement users.
 - i. Expenses have been appropriately classified in or allocated to functions and programs in the statement of activities, and allocations have been made on a reasonable basis.
 - j. Revenues are appropriately classified in the statement of activities within program revenues, general revenues, contributions to term or permanent endowments, or contributions to permanent fund principal.
 - k. GDOE's policy regarding whether to first apply restricted or unrestricted resources when an expense is incurred for purposes for which both restricted and unrestricted net position is available and appropriately disclosed and that net position is properly recognized under the policy.
 - l. GDOE has followed GASB Codification Section 1800.178 regarding which resources (restricted, committed, assigned, or unassigned) are considered to be spent for expenditures to determine the fund balance classifications for financial reporting purposes.
 - m. Interfund, internal, and intra-entity activity and balances have been appropriately classified and reported.

- n. Fund balance restrictions, commitments, and assignments are properly classified and, if applicable, approved.
 - o. Federal award expenditures have been charged in accordance with applicable cost principles.
2. GDOE has provided to you all relevant information and access as agreed in the terms of the audit engagement letter.
 3. GDOE has made available to you:
 - a. Public Laws enacted by the Guam Legislature directly related to GDOE and GDOE operations.
 - b. All financial records and related data for all financial transactions of GDOE and for all funds administered by GDOE. The records, books, and accounts, as provided to you, record the financial and fiscal operations of all funds administered by GDOE and provide the audit trail to be used in a review of accountability. Information presented in financial reports is supported by the books and records from which the financial statements have been prepared.
 - c. All minutes of the meetings of the Guam Education Board (GEB) from October 2016 through the date of this letter, which meeting were held on the following dates:

03-Oct-2016	17-Feb-2017	21-Sep-2017
13-Oct-2016	21-Feb-2017	17-Oct-2017
25-Oct-2016	07-Mar-2017	27-Oct-2017
30-Nov-2016	28-Mar-2017	27-Nov-2017
27-Dec-2016	18-Apr-2017	23-Jan-2018
03-Jan-2017	16-May-2017	26-Jan-2018
17-Jan-2017	27-Jun-2017	20-Feb-2018
30-Jan-2017	18-Jul-2017	13-Mar-2018
31-Jan-2017	22-Aug-2017	27-Mar-2018
02-Feb-2017	5-Sep-2017	04-Apr-2018

The May 22, 2018 minutes were not available for examination; however, no significant matters were discussed or agreed upon that would require adjustment or additional disclosure to the financial statements as of September 30, 2017.

- d. All minutes of the meetings of the Education Finance Support Commission (EFSC) from October 2016 through the date of this letter, which meetings were held on the following dates:

31-Oct-2016	30-Mar-2017	25-Jan-2018
30-Nov-2016	31-Aug-2017	22-Feb-2018
28-Dec-2016	28-Sep-2017	29-Mar-2018
25-Jan-2017	26-Oct-2017	26-Apr-2018
22-Feb-2017	22-Dec-2017	

The May 24, 2018 minutes were not available for examination; however, no significant matters were discussed or agreed upon that would require adjustment or additional disclosure to the financial statements as of September 30, 2017.

- e. All summaries of actions of recent GEB or EFSC meetings for which minutes have not yet been prepared.
 - f. Contracts and grant agreements (including amendments, if any) and any other correspondence that has taken place with federal agencies.
4. There has been no:
 - a. Action taken by GDOE management that contravenes the provisions of federal laws and Guam laws and regulations, or of contracts and grants applicable to GDOE, except as discussed in the Schedule of Findings and Questioned Costs section of your Independent Auditor's Report on Internal Control and on Compliance.
 - b. Communications with other regulatory agencies concerning noncompliance with or deficiencies in financial reporting practices or other matters that could have a material effect on the financial statements.
5. We believe the effects of any uncorrected financial statement misstatements aggregated by you during the current audit engagement and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the financial statements taken as a whole for each opinion unit. A summary of such uncorrected misstatements has been attached as Appendix A.
6. We believe the effects of the uncorrected financial statement misstatements detected in the current year that relate to the prior year presented, when combined with those misstatements aggregated by you during the prior-year audit engagement and pertaining to the prior year presented, are immaterial, both individually and in the aggregate, to the financial statements for the year ended September 30, 2016 taken as whole. A summary of such uncorrected misstatements has been as attached as Appendix B.
7. GDOE has not performed a risk assessment, including the assessment of the risk that the financial statements may be materially misstated as a result of fraud. However, management has made available to you their understanding about the risks of fraud in GDOE and do not believe that the financial statements are materially misstated as a result of fraud.
8. We have no knowledge of any fraud or suspected fraud affecting GDOE involving:
 - a. Management.
 - b. Employees who have significant roles in GDOE's internal control.
 - c. Others, where the fraud could have a material effect on the financial statements.
9. We have no knowledge of any allegations of fraud or suspected fraud affecting GDOE's financial statements communicated by employees, former employees, analysts, regulators, or others.
10. There are no unasserted claims or assessments that we are aware of or that legal counsel has advised us are probable of assertion and must be disclosed in accordance with GASB Codification of Governmental Accounting and Financial Reporting Standards ("GASB Codification") Section C50, *Claims and Judgments*.

11. Significant assumptions used by us in making accounting estimates are reasonable.
12. We are responsible for the preparation of the Schedule of Expenditures of Federal Awards 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* ("OMB Uniform Guidance"). We have identified and disclosed all of GDOE's government programs and related activities subject to the OMB Uniform Guidance compliance audit. In addition, we have accurately completed the appropriate sections of the data collection form.
13. We are responsible for compliance with local, state, and federal laws, rules, and regulations, including compliance with the requirements of OMB Uniform Guidance, and the provisions of grants and contracts relating to GDOE's operations. We are responsible for establishing and maintaining the components of internal control relating to our activities in order to achieve the objectives of providing reliable financial reports, effective and efficient operations, and compliance with laws and regulations. GDOE is responsible for maintaining accounting and administrative control over revenues, obligations, expenditures, assets, and liabilities.
14. We are responsible for establishing and maintaining, and have established and maintained, effective internal control over compliance for federal programs that provides reasonable assurance that we are managing federal awards in compliance with federal statutes, regulations, and the terms and conditions of the federal awards that could have a material effect on its federal programs.
15. We have disclosed to you all deficiencies in the design or operation of internal control over financial reporting identified as part of our evaluation, including separately disclosing to you all such deficiencies that are significant deficiencies or material weaknesses in internal control over financial reporting.
16. No events have occurred subsequent to September 30, 2017 that require consideration as adjustments to or disclosures in the schedule of federal awards and related notes or that existed at the end of the reporting period that affect noncompliance during the reporting period.
17. We have disclosed all known noncompliance with direct and material compliance requirements occurring subsequent to September 30, 2017.
18. There have been no changes in internal control over compliance or other factors that might significantly affect internal control, including any corrective actions taken by GDOE with regard to significant deficiencies and material weaknesses in internal control over compliance, have occurred subsequent to September 30, 2017.
19. Federal awards expenditures have been charged in accordance with applicable cost principles.
20. The Reporting Package submitted to the Federal Audit Clearinghouse (FAC) as defined by the OMB Uniform Guidance section 2CFR200.512(3)(c) does not contain protected personally identifiable information.
21. We have disclosed all contracts or other agreements with service organizations.
22. We have disclosed to you all communications from service organizations relating to noncompliance with the requirements of federal statutes, regulations, and terms and

conditions of federal awards at those organizations.

23. We have:

- a. Identified and disclosed to you the requirements of federal statutes, regulations, and the terms and conditions of federal awards that are considered to have a direct and material effect on each major program under audit.
- b. Complied, in all material respects, with the direct and material compliance requirements identified above in connection with federal awards, except as disclosed in the Schedule of Findings and Questioned Costs.
- c. Identified and disclosed interpretations of any compliance requirements that have varying interpretations.
- d. Made available all federal awards (including amendments, if any) and any other correspondence relevant to federal programs and related activities that have taken place with federal agencies or pass-through entities. Management has made available all documentation related to compliance with the direct and material compliance requirements, including information related to federal program financial reports and claims for advances and reimbursements. Federal financial reports and claims for advances and reimbursements are supported by the books and records from which the financial statements have been prepared and are prepared on a basis consistent with that presented in the Schedule of Expenditures of Federal Awards. The copies of federal program financial reports provided are true copies of the reports submitted, or electronically transmitted, to the federal agency or pass-through Entity, as applicable.
- e. Identified and disclosed all amounts questioned and all known noncompliance with the direct and material compliance requirements of federal awards, including the results of other audits, program reviews, or any communications from federal awarding agencies and pass-through entities concerning possible noncompliance related to the objectives of the audit.
- f. Identified previous financial audits, attestation engagements, performance audits, or other studies related to the objectives of the audit and the corrective actions taken to address significant findings and recommendations, including the status of follow-up on prior audit findings (and information about all management decisions) by federal awarding agencies and pass-through entities.
- g. Provided to you our views on the reported findings, conclusions, and recommendations for your report.
- h. Monitored subrecipients to determine that they have expended subawards in compliance with federal statutes, regulations, and terms and conditions of the subaward and have met the other pass-through entity requirements of OMB Uniform Guidance.
- i. Issued management decisions for audit findings that relate to federal awards made to subrecipients. Such management decisions were issued within six months of acceptance of the audit report by the FAC. Additionally, we have followed up to determine whether the subrecipient has taken timely and appropriate action on all deficiencies detected through audits, on-site reviews, and other means that pertain to the federal award provided to the subrecipient from GDOE.

- j. Considered the results of the subrecipient's audits and made any necessary adjustments to GDOE's own books and records.
24. We are responsible for follow-up on all prior-year(s) findings. We have prepared a summary schedule of prior-year findings by federal awarding agency and pass-through entity, including all management decisions, to report the status of our efforts in implementation of the prior-year's corrective action plan. The summary schedule of prior audit findings includes all findings required to be included in accordance with OMB Uniform Guidance.
 25. We are responsible for taking corrective action on audit findings and have developed a corrective action plan that meets the requirements of OMB Uniform Guidance. We have included in the corrective action plan for current-year findings, the name of the person in our organization responsible for implementation of the actions, the best actions to be taken, and the estimate of a completion date. We have taken timely and appropriate steps to remedy fraud, illegal acts, violations of provisions of contracts or grant agreements, or abuse that you report.
 26. Management has identified and disclosed to you all laws and regulations that have a direct and material effect on the determination of financial statement amounts.
 27. We have adopted the provisions of GASB Codification Section 2100, *Defining the Financial Reporting Entity*. No organization meets the criteria established in GASB Codification Section 2100, *Defining the Financial Reporting Entity*, for inclusion as a component unit. No organizations, except the Foundation for Public Education, Inc. (Foundation), as noted below were identified that meet the criteria established in GASB Codification Section 2100, *Defining the Financial Reporting Entity*:

On August 2013, the Foundation, was established. It is a legally separate, tax-exempt entity which meets the criteria set forth for component units under GASB Statement No. 39, *Determining Whether Certain Organizations are Component Units*. The Foundation provides financial support of the objectives, purpose and programs of GDOE. Although GDOE does not control the timing, purpose, or amount of receipts from the Foundation, the resources (and income thereon) that the Foundation holds and invests are restricted to the activities of GDOE. As the resources held by the Foundation can only be sued by, or for the benefit of GDOE, the Foundation is considered a component unit of GDOE. As of September 30, 2017, the Foundation reported minimal collections below \$100,000 therefore omission of the Foundation is not considered material to the financial statements of GDOE.

Except where otherwise stated below, immaterial matters less than \$3,160,000 collectively for governmental activities, \$1,520,000 collectively for the General Fund, \$620,000 collectively for the Federal Grants Assistance Fund, and \$9,400 collectively for the aggregate remaining fund information are not considered to be exceptions that require disclosure for the purpose of the following representations. This amount is not necessarily indicative of amounts that would require adjustment to, or disclosure in, the basic financial statements.

28. Except as listed in Appendix A and Appendix B, there are no transactions that have not been properly recorded and reflected in the financial statements.
29. GDOE has no plans or intentions that may affect the carrying value or classification of assets and liabilities.

30. Regarding related parties:
- a. We have disclosed to you the identity of GDOE's related parties and all the related-party relationships and transactions of which we are aware.
 - b. To the extent applicable, related parties and all the related-party relationships and transactions, including sales, purchases, loans, transfers, leasing arrangements, and guarantees (written or oral) have been appropriately identified, properly accounted for, and disclosed in the financial statements.
31. In preparing the financial statements in accordance with GAAP, management uses estimates. All estimates have been disclosed in the financial statements for which known information available prior to the issuance of the financial statements indicates that both of the following criteria are met:
- a. It is reasonably possible that the estimate of the effect on the financial statements of a condition, situation, or set of circumstances that existed at the date of the financial statements will change in the near term due to one or more future confirming events.
 - b. The effect of the change would be material to the financial statements.
32. There are no:
- a. Instances of identified or suspected noncompliance with laws or regulations whose effects should be considered when preparing the financial statements.
 - b. Known actual or possible litigation and claims whose effects should be considered when preparing the financial statements and that have not been disclosed to you and accounted for and disclosed in accordance with GAAP.
 - c. Other liabilities or gain or loss contingencies that are required to be accrued or disclosed by GASB Codification Section C50, *Claims and Judgments*, except for as noted on Note 4F.
33. GDOE has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral.
34. GDOE has complied with all aspects of contractual agreements that may affect the financial statements.
35. No department or agency of GDOE has reported a material instance of noncompliance to us.
36. GDOE has identified all derivative instruments as defined by GASB Codification Section D40, *Derivative Instruments*, and appropriately recorded and disclosed such derivatives in accordance with GASB Codification Section D40.
37. No events have occurred after September 30, 2017, but before June 25, 2018, the date the financial statements were issued that require consideration as adjustments to or disclosures in the financial statements.
38. Regarding required supplementary information:

- a. We confirm that we are responsible for the required supplementary information.
 - b. The required supplementary information is measured and presented in accordance with GASB Codification 2200, *Comprehensive Annual Financial Report*.
 - c. The methods of measurement and presentation of the supplementary information have changed from those used in the prior period and, the reasons for such changes are due to the adoption of Governmental Accounting Standards Board (GASB) Statement No. 73, *Accounting and Financial Reporting for Pensions and Related Assets That Are Not Within the Scope of GASB Statement No. 68, and Amendments to Certain Provisions of GASB Statements No. 67 and No. 68*. As a result of adopting this standard, GVB has elected to restate its 2016 financial statements to reflect the adoption of this standard.
39. Regarding supplementary information:
- a. We are responsible for the preparation and fair presentation of the supplementary information in accordance with GASB Codification Section 2200, *Comprehensive Annual Financial Report*.
 - b. We believe the supplementary information, including its form and content, is fairly presented in accordance with GASB Codification Section 2200, *Comprehensive Annual Financial Report*.
 - c. The method of measurement and presentation of the supplementary information have not changed from those used in the prior period.
40. Risks associated with concentrations, based on information known to management, that meet all of the following criteria have been disclosed in the financial statements:
- a. The concentration exists at the date of the financial statements.
 - b. The concentration makes the enterprise vulnerable to the risk of a near-term severe impact.
 - c. It is at least reasonably possible that the events could cause a severe impact to occur in the near term.
41. GDOE is exposed to various risks of loss related to torts; theft of damage to and destruction of assets; errors or omissions; injuries to employees; and natural disasters. It is the policy of the primary government not to purchase commercial insurance for the risks of loss to which it is exposed. Instead, the Government management believes it is more economical to manage its risks internally. In the event of claim settlements and judgements, GDOE reports all of its risk management activities in its General Fund. Claims expenditures and liabilities are reported when it is probable that a loss has occurred and the amount of the loss can be reasonably estimated. These losses include an estimate of claims that have been incurred but not reported. No losses have occurred as a result of these risks in the past three fiscal years.
42. We have appropriately identified and properly recorded and disclosed in the financial statements all interfund transactions, including repayment terms.

43. Arrangement with financial institutions involving compensating balances and other arrangements involving restriction on cash balances, line of credit, or similar arrangements have been properly disclosed in the financial statements.
44. Quantitative and qualitative information regarding the allowance for doubtful accounts has been properly disclosed in the financial statements. Allowance for doubtful accounts is determined by specific identification and collective assessment of accounts receivables.
45. Receivables recorded in the financial statements represent valid claims against debtors for appropriations or grants arising on or before the balance sheet date and have been appropriately reduced to their estimated net realizable value.
46. We believe that all expenditures that have been deferred for future period are recoverable.
47. We believe that the actuarial assumptions and methods used to measure pension costs for financial reporting purposes are appropriate in the circumstances.
48. We do not plan to make frequent amendments to our pension or other post-retirement benefit plans.
49. We have no intention of terminating any of our pension plans or taking any other action that could result in an effective termination or reportable event for any of the plans. We are not aware of any occurrences that could result in the termination of any of our pension plans to which we contribute.
50. No evidence of fraud, possible irregularities, or dishonesty in fiscal operations of programs administered by GDOE has been discovered.
51. As of September 30, 2017, \$60,153,208 of the Tiyan properties purchased were occupied. The remaining \$26,995,762 of properties have not been occupied however have been recorded as of September 30, 2017 and will be depreciated when the occupancy permit has been provided.
52. GDOE is exposed to various risks of loss related torts; theft of, damage to, and destruction of assets; error and omission; injuries to employees; and natural disasters. GDOE has elected to purchase commercial insurance from independent third parties for the risk of loss to which it is exposed. Settled claims from these risk have not exceeded commercial insurance coverage for the past four years.
53. During the year ended September 30, 2017, GDOE implemented the following pronouncements:
 - GASB Statement No. 73, *Accounting and Financial Reporting for Pensions and Related Assets That Are Not Within the Scope of GASB Statement 68, and Amendments to Certain Provisions of GASB Statements 67 and 68*, which aligns the reporting requirements for pensions and pension plans not covered in GASB Statements 67 and 68 with the reporting requirements in Statement 68. The implementation of this statement has no impact on GDOE's governmental fund financial statements, which continue to report expenditures in the amount statutorily required. However, implementation has resulted in the restatement of GDOE's government-wide financial statements to reflect the reporting of net

pension liabilities, deferred inflows of resources and deferred outflows of resources for certain ad hoc COLA and supplemental annuity payments and the recognition of pension expense in accordance with the provisions of GASB Statement No. 73. The government-wide financial statements were also restated due to changes in actuarial assumptions and other inputs used to determine net pension liabilities, deferred inflows of resources and deferred outflows of resources for the qualified defined benefit pension plan.

Net pension as of October 1, 2016 for governmental activities decreased by \$86,736,928 as a result of the implementation of GASB Statement No. 73 and the change in actuarial assumptions and other inputs. Refer to Note 5 for more information regarding GDOE's pensions.

- GASB Statement No. 74, *Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans*, which replaces Statements No. 43, *Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans, as amended*, and No. 57, *OPEB Measurements by Agent Employers and Agent Multiple-Employer Plans*, and addresses financial reporting requirements for governments whose employees are provided with postemployment benefits other than pensions (other postemployment benefits or OPEB).
- GASB Statement No. 77, *Tax Abatement Disclosures*, which requires governments that enter into tax abatement agreements to disclose certain information about the agreements.
- GASB Statement No. 78, *Pensions Provided through Certain Multiple-Employer Defined Benefit Pension Plans*, which addresses a practice issue regarding the scope and applicability of Statement No. 68, *Accounting and Financial Reporting for Pensions*.
- GASB Statement No. 80, *Blending Requirements for Certain Component Units - an amendment of GASB Statement No. 14*, which improves financial reporting by clarifying the financial statement presentation requirements for certain component units.
- GASB Statement No. 82, *Pension Issues - an amendment of GASB Statements No. 67, No. 68, and No. 73*, which addresses issues regarding (1) the presentation of payroll-related measures in required supplementary information, (2) the selection of assumptions and the treatment of deviations from the guidance in an Actuarial Standard of Practice for financial reporting purposes, and (3) the classification of payments made by employers to satisfy employee (plan member) contribution requirements.

Except for GASB Statement No. 73, the implementation of these statements did not have a material effect on the GDOE's financial statements.

54. In June 2015, GASB issued Statement No. 75, *Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions*, which replaces the requirements of Statement No. 45, *Accounting and Financial Reporting by Employers for Postemployment Benefits Other Than Pensions, as amended*, and No. 57, *OPEB Measurements by Agent Employers and Agent Multiple-Employer Plans*, and provides guidance on reporting by governments that provide OPEB to their employees and for

- governments that finance OPEB for employees of other governments. The provisions in Statement No. 75 are effective for fiscal years beginning after June 15, 2017. Based on an actuarial valuation dated October 1, 2015, the net OPEB obligation that GDOE will record upon implementation of Statement 75 is anticipated to be \$360,793,746 as of September 30, 2017.
55. In March 2016, GASB issued Statement No. 81, *Irrevocable Split-Interest Agreements*, which improves accounting and financial reporting for irrevocable split-interest agreements by providing recognition and measurement guidance for situations in which a government is a beneficiary of the agreement. The provisions in Statement No. 81 are effective for fiscal years beginning after December 15, 2016. Management does not believe that the implementation of this statement will have a material effect on the financial statements.
 56. In November 2016, GASB issued Statement No. 83, *Certain Asset Retirement Obligations*, which addresses accounting and financial reporting for certain asset retirement obligations (AROs) associated with the retirement of a tangible capital asset. The provisions in Statement No. 83 are effective for fiscal years beginning after June 15, 2018. Management does not believe that the implementation of this statement will have a material effect on the financial statements.
 57. In January 2017, GASB issued Statement No. 84, *Fiduciary Activities*, which establishes criteria for identifying fiduciary activities of all state and local governments. The provisions in Statement No. 84 are effective for fiscal years beginning after December 15, 2018. Management does not believe that the implementation of this statement will have a material effect on the financial statements.
 58. In March 2017, GASB issued Statement No. 85, *Omnibus 2017*, which address practice issues that have been identified during implementation and application of certain GASB Statements including issues related to blending component units, goodwill, fair value measurement and application, and postemployment benefits (pensions and other postemployment benefits). The provisions in Statement No. 85 are effective for fiscal years beginning after June 15, 2017. Management does not believe that the implementation of this statement will have a material effect on the financial statements.
 59. In May 2017, GASB issued Statement No. 86, *Certain Debt Extinguishment Issues*, which improves consistency in accounting and financial reporting for in-substance defeasance of debt. The provisions in Statement No. 86 are effective for fiscal years beginning after June 15, 2017. Management does not believe that the implementation of this statement will have a material effect on the financial statements.
 60. In June 2017, GASB issued Statement No. 87, *Leases*, which establishes a single model for lease accounting based on the foundational principle that leases are financings of the right to use an underlying asset. The provisions in Statement No. 87 are effective for fiscal years beginning after December 15, 2019. Management has yet to determine whether the implementation of this statement will have a material effect on the financial statements.
 61. We believe that the actuarial assumptions and methods used to measure pension liabilities and costs for financial accounting purposes are appropriate in the circumstances. These amounts have been appropriately recognized and displayed as assets, liabilities and, where applicable, deferred inflows, deferred outflows, net

position and changes in net position in the financial statements in accordance with GASB Codification Section P20, Pension Activities - Reporting for Benefits Provided through Trusts that Meet Specified Criteria — Defined Benefit.

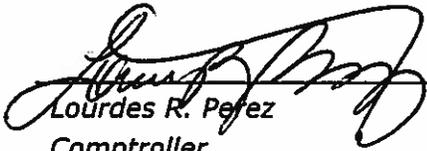
62. GDOE has obligated, expended, received, and used public funds in accordance with the purpose for which such funds have been appropriated or otherwise authorized by Guam or federal law. Such obligation, expenditure, receipt, or use of public funds was in accordance with any limitations, conditions, or mandatory directions imposed by Guam or federal law.



Jon J. P. Fernandez
Superintendent of Education



Taling M. Taitano
Deputy Superintendent of Finance and
Administrative Services



Lourdes R. Perez
Comptroller



Franklin J.T. Cooper-Nurse
Chief Internal Auditor

APPENDIX A

GENERAL FUND	Type of Entry	Balance Sheet			Income Statement
		Assets	Liabilities	Net Position at Beg of Year	Expenditures (Income)
		Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)
Entry Description	Type of Entry	Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)
1) To write off payables aged over 4 years	Judgmental		1,202,819		(1,202,819)
2) To record additional liabilities	Factual		(2,336,941)		2,336,941
	Judgmental		(299,849)		299,849
3) To record deposit for Okkodo Expansion lease	Factual	2,286,685			(2,286,685)
4) To record deposit for Tiyan lease	Factual	781,574			(781,574)
		3,068,259	(1,433,971)		(1,634,288)

FEDERAL GRANTS ASSISTANCE FUND	Type of Entry	Balance Sheet			Income Statement
		Assets	Liabilities	Net Position at Beg of Year	Expenditures (Income)
		Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)
Entry Description	Type of Entry	Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)
None to report for FY2017					
		-	-		-

GOVERNMENT WIDE	Type of Entry	Balance Sheet			Income Statement
		Assets	Liabilities	Net Position at Beg of Year	Expenditures (Income)
		Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)
Entry Description	Type of Entry	Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)
General Fund	-	3,068,259	(1,433,971)		(1,634,288)
Federal Grants Assistance Fund	-	-	-		-
1) To adjust Tiyan deposit		(781,574)			781,574
		2,286,685	(1,433,971)		(852,714)

APPENDIX B

GENERAL FUND	Type of Entry	Balance Sheet				Income Statement
		Assets	Liabilities	Net Position at Beg of Year	Other Equity A/Cs	Expenditures (Income)
		Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)
Entry Description						
1) To report unrecorded liabilities	Factual		(813,100)			813,100
2) To record indirect cost revenue	Factual	3,076,042			(1,852,774)	(1,223,268)
3) To record lease deposit - Guam Public School Facilities	Factual	273,957				(273,957)
4) To record lease deposit - Okkodo Expansion	Factual	2,284,685				(2,284,685)
		5,634,684	(813,100)		(1,852,774)	(2,968,810)

FEDERAL GRANTS ASSISTANCE FUND	Type of Entry	Balance Sheet				Income Statement
		Assets	Liabilities	Net Position at Beg of Year	Other Equity A/Cs	Expenditures (Income)
		Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)
Entry Description						
To record amounts due to General Fund	Factual	(3,076,042)	3,076,042			
		(3,076,042)	3,076,042		-	-

GOVERNMENT WIDE	Type of Entry	Balance Sheet				Income Statement
		Assets	Liabilities	Net Position at Beg of Year	Other Equity A/Cs	Expenditures (Income)
		Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)	Dr (Cr)
Entry Description						
General Fund		5,634,684	(813,100)		(1,852,774)	(2,968,810)
Federal Grants Assistance Fund		(3,076,042)	3,076,042		-	-
1) To adjust capital lease liability-Guam Public School Facilities	Factual	(261,877)	3,165,000			(2,903,123)
2) To adjust capital lease obligation-Okkodo Expansion	Factual		1,340,000			(1,340,000)
3) To adjust pension liability	Factual		4,234,409		(4,234,409)	
		2,296,765	11,002,351		(6,087,183)	(7,211,933)