

**CITY OF SAN RAFAEL
MEMORANDUM ON INTERNAL CONTROL
AND
REQUIRED COMMUNICATIONS
FOR THE YEAR ENDED JUNE 30, 2015**

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**CITY OF SAN RAFAEL
MEMORANDUM ON INTERNAL CONTROL
AND
REQUIRED COMMUNICATIONS**

For The Year Ended June 30, 2015

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MEMORANDUM ON INTERNAL CONTROL

To the City Council of
the City of San Rafael, California

We have audited the basic financial statements of the City of San Rafael for the year ended June 30, 2015, and have issued our report thereon dated September 30, 2015 (except for Note 9D, which is as of December 22, 2015). Our opinions on the basic financial statements and this report, insofar as they relate to San Rafael Sanitation District (District), are based solely on the report of other auditors. In planning and performing our audit of the basic financial statements of the City of San Rafael, in accordance with auditing standards generally accepted in the United States of America, we considered the City's internal control over financial reporting (internal control) as a basis for designing our 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 the City's internal control. Accordingly, we do not express an opinion on the effectiveness of the City'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 and that were not identified. In addition, because of inherent limitations in internal control, including the possibility of management override of controls, misstatements due to error or fraud may occur and not be detected by such controls. However, as discussed below, 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 City'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 the deficiencies in internal control included on the Schedule of Significant Deficiencies to be significant deficiencies.

Included in the Schedule of Other Matters are recommendations not meeting the above definitions that we believe are opportunities for strengthening internal controls and operating efficiency.

Management's written responses included in this report have not been subjected to the audit procedures applied in the audit of the financial statements and, accordingly, we express no opinion on them.

This communication is intended solely for the information and use of management, City Council, others within the organization, and agencies and pass-through entities requiring compliance with *Government Auditing Standards*, and is not intended to be and should not be used by anyone other than these specified parties.

Maze & Associates

Pleasant Hill, California
September 30, 2015

**CITY OF SAN RAFAEL
MEMORANDUM ON INTERNAL CONTROL**

SCHEDULE OF SIGNIFICANT DEFICIENCIES

2015 – 1: Accuracy of Special Assessment Tax Rolls

Criteria: Currently, there are seven special assessments applicable to the City. On behalf of the City, the County maintains a database for each of these assessments. These assessments are included in the applicable tax bills sent to the property owners served by the City. The City is responsible for ensuring that tax revenue is correctly calculated, charged and received.

Condition: In June of 2015, during the Finance Department's review of the senior exemptions for the Library Parcel, it was discovered that there were errors in certain commercial properties tax assessments. Subsequently in July 2015, the Finance Department conducted a comprehensive review of the tax roll information provided by the County for the fiscal year 2015-16 assessment. The review focused primarily on commercial and industrial properties that had not been charged. During the review, the Finance staff found that there were inconsistencies (missing or conflicting data) among its tax rolls. In addition, it was discovered that some properties were undercharged due to new or existing developments which were not reflected on the tax rolls or properties which were miscoded and or listed as vacant.

Effect: The City submitted the following corrections to the County, for the fiscal year 2015-16 assessment:

	Total Assessment	Corrections	%
	2015/16	Submitted	Change
San Rafael Paramedic	\$3,860,412	\$474,278	12.29%
CSA #13 Paramedic	52,841	-	0.00%
CSA #19 Paramedic	226,322	-	0.00%
Marinwood Paramedic	155,454	-	0.00%
Run Off Fee	866,077	88,263	10.19%
Inspection Fees	345,959	9,921	2.87%
Library Parcel	869,409	(4,572)	-0.53%
	<u>\$6,376,474</u>	<u>\$567,890</u>	<u>8.91%</u>

Cause: Once a week, the City provides building permits, plans and related information regarding parcel changes or updates to the County. It is assumed that the County uses the information to update the City's various tax rolls. Every July, the County sends the City the Preliminary Tax Roll report for the coming assessment. The City has approximately thirty days to submit corrections of the tax roll to the County. Due to limited staff resources and the format of the Preliminary Tax Roll prior to 2015, the City had not comprehensively verified information on the Preliminary Tax Roll in prior years.

Recommendation: The City should review all if its special assessments collected through the County tax rolls for accuracy.

Since most of the changes in assessments are triggered by modification or improvement of the parcels, the City should establish interdepartmental procedures so that a centralized log is kept to keep track of parcel changes or updates. This log should be used as supplemental information to the permits and building plans that are already provided in the regular dissemination of information to the County. Annually, the City should review the Preliminary Tax Roll report sent by the County. As part of the review, information on the Tax Roll should be compared to the centralized log to ensure that changes are made throughout the various tax rolls. In addition, if the City does not have resources to verify all information on the Preliminary Tax Roll report, a representative sample should be pulled every year to ensure that information on the report is consistent with the City's records of the properties.

**CITY OF SAN RAFAEL
MEMORANDUM ON INTERNAL CONTROL**

SCHEDULE OF SIGNIFICANT DEFICIENCIES

2015 – 1: Accuracy of Special Assessment Tax Rolls (Continued)

Management's Response: Management agrees with the characterization of this issue and the recommendations. City staff is continuing with the analysis and correction of assessments for the current tax year (FY2015-16).

The City will collaborate with the County to identify the optimal process for updating property types (Use Codes) and square footage metrics in a real-time manner that ensures that this information is properly incorporated into the City's special assessments, and accurate upon the preparation of the Preliminary Tax Rolls. The ongoing process will evaluate whether changes to parcels have occurred, including status of parcel (vacant, residential, commercial, etc.), number of living units, and building/land square footage.

Finance staff will review the Preliminary Tax Rolls annually, using information provided by Community Development and Public Works, to verify that changes that have taken place during the past year have been correctly applied to the assessments. Staff will also sample parcels that have not undergone changes, in order to verify the continued accuracy of City tax assessments on these parcels.

2015 -- 2: Internal Control over Employee Benefits and Claims Activities

Criteria: Changes made to employee benefits in the City's Financial System, Eden, should be reviewed by a second employee who has the specialty to conduct such review. New benefit line items created in Eden should also be reviewed for accurate coding. In addition, payments processed by a third-party administrator (TPA) should be reviewed and reconciled for proper authorization and accuracy.

Condition: During our audit, we noted that the City has not established formal review procedures for employee benefit changes made to the personnel database in Eden. The Human Resources Department (HR) is responsible for making changes to employee benefits in the personnel database in Eden. Once changes are made, HR sends a memo, along with employee Personnel Actions Forms, and other relevant data, to the Finance Department. Finance Department then uses the information to process payroll. Occasionally, when Finance notices any discrepancies between what is reported in Eden and the employees benefit information during payroll processing, HR will be notified. However, the City's current practice does not require a qualified employee to review data changed in the personnel database.

In addition, when a new line item is set up in the personnel database, such as a new benefit, the City does not have any procedures established requiring a review by a qualified employee to ensure that the appropriate categories, such as tax exempt status, have been selected.

Furthermore, the City contracts with TPAs to administer transactions of the Workers' Compensation, General Liability, Dental, and 125 Flexible Employee Benefits activities. Payments relating to these activities are processed by the TPAs. Monthly, the Finance Department performs reconciliations to ensure that activities reported to the City by the TPAs reconciles with the related bank accounts. However, this reconciliation only verifies the existence of these activities, not their validity. In addition to the monthly bank reconciliation, certain control procedures are performed by City staff:

- For Workers' Compensation, HR reviews reports from the TPA on a monthly basis and checks for any unusual items. Any unusual items are followed up with the TPA. Monthly report is then forwarded to Finance. Final claim settlements are traced to City's authorization.

**CITY OF SAN RAFAEL
MEMORANDUM ON INTERNAL CONTROL**

SCHEDULE OF SIGNIFICANT DEFICIENCIES

2015 -- 2: Internal Control over Employee Benefits and Claims Activities (Continued)

- For General Liability, reports from TPA are reviewed by the City Attorney's Office. Any discrepancies are followed up with the TPA. Final claim settlements are traced to City's authorization.
- For Dental and 125 Flexible Benefits, City staff verifies whether the claimants stated on the TPA reports are current City employees.

Although various control activities are performed by the City to monitor activities in these accounts, the City does not verify the validity of each transaction processed by these TPAs.

Effect: Without a proper review of changes made to personnel database, errors may not be detected in a timely manner.

For the Workers' Compensation, General Liability, Dental, and 125 Flexible Employee Benefits accounts, the procedures used by these TPAs are outside the scope of City oversight and staff review, nor are these controls part of the scope of an audit of the City's financial statements. Without, procedures to gain comfort that these TPAs are performing their functions in a prudent manner, errors made by the TPAs may not be detected in a timely manner.

Cause: Assumptions were made amongst departments that changes in Eden were reviewed.

Additionally, City staff was unaware that their current procedures in monitoring the Workers' Compensation, General Liability, Dental, and 125 Flexible Employee Benefits activities managed by the TPAs are insufficient.

Recommendation: The City should develop review procedures for changes made to the personnel database. A qualified City employee who has knowledge of human resources rules and regulations should be designated to conduct the review. When discrepancies or errors in payroll processing are brought to the City's attention, we recommend the City consider performing sampling tests to determine if the discrepancy is an isolated incident, or needs to be investigated further as a system-wide error.

Additionally, we recommend the City establish review procedures to ensure that Workers' Compensation, General Liability, Dental, and 125 Flexible Employee Benefits payments processed by TPAs are valid. The City can achieve this in several ways. It can review each transaction to ensure that the transaction is either authorized by the City (such as claim settlement) or reasonable in nature. Alternative, special audits can be performed, either by City staff or a consultant, to determine adequacy of controls and to verify the data produced. A third option is to review Service Auditor's Reports of these TPAs. A Service Auditor's Report contains information regarding the service organization's controls and the effectiveness of those controls. In the case of a Service Auditor's (Type II) Report, a user organization, such as the City, receives a detailed description of the service organization's controls and an independent assessment of whether the controls were placed in operation, suitably designed, and operating effectively specifically to that user organization.

**CITY OF SAN RAFAEL
MEMORANDUM ON INTERNAL CONTROL**

SCHEDULE OF SIGNIFICANT DEFICIENCIES

2015 -- 2: Internal Control over Employee Benefits and Claims Activities (Continued)

Management Response: The City will establish a new process whereby all employee record/master data changes (e.g., initial employee set-up, benefits, bargaining unit/MOUs, salary schedules) that are entered into the payroll system will be reviewed and approved by qualified staff to ensure the accuracy of the payroll calculation and all requisite tax reporting requirements. HR and Finance Payroll staff will be trained to qualify them to review these types of changes. Any discrepancies or errors in payroll processing will be brought to the attention of the Human Resources Director and/or Finance Director, and sampling tests will be performed to determine the scope of the discrepancy and necessary corrective actions.

In addition, the City is undergoing a review of benefit administration processes in an effort to improve internal controls. The City expects that changes will be made to the internal control processes as a result of this effort.

In addition to reviewing the TPA's monthly reports, the City will institute the following additional review procedures for Workers' Compensation and General Liability payments processed by its third party claims administrator:

- Verify that claim settlement payments are consistent with the written authorization provided by the City of San Rafael.
- Twice per year, select a representative sample of claims payments to review for accuracy.
- Review the Service Auditor's Type II Report to ensure the Workers Compensation TPA has appropriate and effective internal controls.

In addition to verifying that all claimants reported by the TPA are eligible City employees, the City will institute the following additional review procedures for Dental and Section 125 Flexible Benefits payments processed by a third party claims administrator:

- Review the Service Auditor's Type II Report to ensure the TPA has appropriate and effective internal controls.

**CITY OF SAN RAFAEL
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SCHEDULE OF OTHER MATTERS

2015 -- 3: Receivable from San Rafael Sanitary District

The San Rafael Sanitary District has no regular full-time employees. Through an original agreement dated November 5, 1969 and various amendments, the City provides the District certain maintenance service, general engineering services and general administrative services. In return, the District reimburses the City for such costs. Both entities believe that such costs should include all payroll cost of those City staff providing services for the District, such as benefits, workers' compensation, and contributions for pension and post-employment benefit (OPEB) trusts.

During fiscal year 2015, the City implemented two accounting pronouncements, Governmental Accounting Statement Board Statements 68 and 71, resulting in the recognition of unfunded pension liability on the City's financial statements. Since portion of this liability was accrued by City staff providing services to the District, it was deemed necessary that a receivable/payable be established to recognized the District's share of the pension liability. In addition, management of both the City and the District determined that a receivable/payable should also be established to reflect the District's share of the unfunded OPEB liability accrued by the same group of employees. As of June 30, 2015, the City reported a receivable of \$4,462,815 from the District for pension and OPEB related costs.

Both entities believe that the cost reimbursement described in the original agreement includes the cost of contributions to the pension and OPEB trusts. However, due to the significant amounts involved, it is crucial that such commitment be formalized with documented approvals from both the City Council and the District Board. We understand that the City and the District are currently working together to formalize the commitment. We will follow up on the progress during the next audit.

Management Response: The City agrees that commitments related to the obligation of the District with respect to pension and OPEB costs, including the allocation of related liabilities, should be formalized. In the course of preparing for the implementation of GASB No. 68, the City Finance Committee and the District Board were informed of the need to measure and allocate these costs from the City to the District. The City and District have prepared an administrative-level agreement that documents the mutual understanding and agreement as to how these amounts are to calculated for financial reporting purposes. The City will work with the District to revise its City Council and District Board approved operating agreement to explicitly describe and recognize the full range of allocable personnel-related costs to the District.

**CITY OF SAN RAFAEL
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SCHEDULE OF OTHER MATTERS

NEW GASB PRONOUNCEMENTS OR PRONOUNCEMENTS NOT YET EFFECTIVE

The following comment represents new pronouncements taking effect in the next few years. We have cited them here to keep you abreast of developments:

Effective in fiscal year 2015-16

GASB 72 – *Fair Value Measurement and Application*

This Statement addresses accounting and financial reporting issues related to fair value measurements. The definition of *fair value* is the price that would be received to sell an asset or pay to transfer a liability in an orderly transaction between market participants at the measurement date. This Statement provides guidance for determining a fair value measurement for financial reporting purposes. This Statement also provides guidance for applying fair value to certain investments and disclosures related to all fair value measurements.

GASB 76 - *The Hierarchy of Generally Accepted Accounting Principles for State and Local Governments*

The objective of this Statement is to identify, in the context of the current governmental financial reporting environment, the hierarchy of generally accepted accounting principles (GAAP). The “GAAP hierarchy” consists of the sources of accounting principles used to prepare financial statements of state and local governmental entities in conformity with GAAP and the framework for selecting those principles. This Statement reduces the GAAP hierarchy to two categories of authoritative GAAP and addresses the use of authoritative and non-authoritative literature in the event that the accounting treatment for a transaction or other event is not specified within a source of authoritative GAAP. This Statement supersedes Statement No. 55, *The Hierarchy of Generally Accepted Accounting Principles for State and Local Governments*.

Effective in fiscal year 2016-17:

GASB 73 – *Accounting and Financial Reporting for Pensions and Related Assets That Are Not within the Scope of GASB Statement 68*

This Statement establishes requirements for defined benefit pensions that are not within the scope of Statement No. 68, *Accounting and Financial Reporting for Pensions*, as well as for the assets accumulated for purposes of providing those pensions. In addition, it establishes requirements for defined contribution pensions that are not within the scope of Statement 68. It also amends certain provisions of Statement No. 67, *Financial Reporting for Pension Plans*, and Statement 68 for pension plans and pensions that are within their respective scopes.

CITY OF SAN RAFAEL
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SCHEDULE OF OTHER MATTERS

GASB 74 – Financial Reporting for Post-employment Benefit Plans Other Than Pension Plans

The objective of this Statement is to improve the usefulness of information about post-employment benefits other than pensions (other post-employment benefits or OPEB) included in the general purpose external financial reports of state and local governmental OPEB plans for making decisions and assessing accountability. This Statement results from a comprehensive review of the effectiveness of existing standards of accounting and financial reporting for all post-employment benefits (pensions and OPEB) with regard to providing decision-useful information, supporting assessments of accountability and inter-period equity, and creating additional transparency.

GASB 77 – Tax Abatement Disclosures

This Statement establishes financial reporting standards for tax abatement agreements entered into by state and local governments. The disclosures required by this Statement encompass tax abatements resulting from both (a) agreements that are entered into by the reporting government and (b) agreements that are entered into by other governments and that reduce the reporting government's tax revenues.

Effective in fiscal year 2017-18:

GASB 75 – Accounting and Financial Reporting for Post-employment Benefits Other Than Pensions

The primary objective of this Statement is to improve accounting and financial reporting by state and local governments for post-employment benefits other than pensions (other post-employment benefits or OPEB). It also improves information provided by state and local governmental employers about financial support for OPEB that is provided by other entities. This Statement results from a comprehensive review of the effectiveness of existing standards of accounting and financial reporting for all post-employment benefits (pensions and OPEB) with regard to providing decision-useful information, supporting assessments of accountability and inter-period equity, and creating additional transparency.

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REQUIRED COMMUNICATIONS

To the City Council of
the City of San Rafael, California

We have audited the basic financial statements of the City of San Rafael for the year ended June 30, 2015. Professional standards require that we communicate to you the following information related to our audit under generally accepted auditing standards and, *Government Auditing Standards* and OMB Circular A-133.

Significant Audit Findings

Accounting Policies

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by the City of San Rafael are described in Note 1 to the financial statements. No new accounting policies were adopted and the application of existing policies was not changed during the year, except as follows:

The following Governmental Accounting Standards Board (GASB) pronouncements became effective, but did not have a material effect on the financial statements:

GASB Statements No. 69 – *Government Combinations and Disposals of Government Operations*

The following pronouncements became effective, and as disclosed in Note 1 to the financial statements required a prior period restatement for the cumulative effect on the financial statements.

GASB Statement No. 68 – *Accounting and Financial Reporting for Pensions, an Amendment of GASB Statement No. 27*

This Statement establishes standards for measuring and recognizing liabilities, deferred outflows of resources, and deferred inflows of resources, and expense/expenditures. For defined benefit pensions, this Statement identifies the methods and assumptions that should be used to project benefit payments, discount projected benefit payments to their actuarial present value, and attribute that present value to periods of employee service.

Note disclosure and required supplementary information requirements about pensions also are addressed. Distinctions are made regarding the particular requirements for employers based on the number of employers whose employees are provided with pensions through the pension plan and whether pension obligations and pension plan assets are shared.

In addition, this Statement details the recognition and disclosure requirements for employers with liabilities (payables) to a defined benefit pension plan and for employers whose employees are provided with defined contribution pensions. This Statement also addresses circumstances in which a non-employer entity has a legal requirement to make contributions directly to a pension plan.

GASB Statement No. 71 – *Pension Transition for Contributions Made Subsequent to the Measurement Date, an Amendment of GASB Statement No. 68*

The objective of this Statement is to address an issue regarding application of the transition provisions of Statement No. 68, Accounting and Financial Reporting for Pensions. The issue relates to amounts associated with contributions, if any, made by a state or local government employer or non-employer contributing entity to a defined benefit pension plan after the measurement date of the government's beginning net pension liability.

As disclosed in Note 1N to the financial statements, in fiscal year 2015, the City adopted a new methodology for determining the liabilities in the Worker's Compensation and General Liability fund liabilities. Previously, the City used the expected values (50% confidence level) of outstanding losses in calculating these liabilities. The new methodology employs a 70% confidence level for the value of outstanding losses as well as an allowance for unallocated loss adjustment expenses and other measurable financial exposure.

Unusual Transactions, Controversial or Emerging Areas

We noted no transactions entered into by the City 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.

Estimates

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. The most sensitive estimate(s) affecting the City's financial statements was (were):

- *Estimated Net Pension Liabilities and Pension-Related Deferred Outflows and Inflows of Resources:* Management's estimate of the net pension liabilities and deferred outflows/inflows of resources are disclosed in Note 9 to the financial statements and are based on actuarial studies determined by a consultant, which are based on the experience of the City. We evaluated the key factors and assumptions used to develop the estimate and determined that it is reasonable in relation to the basic financial statements taken as a whole.
- *Management's estimate of the depreciation:* is based on useful lives determined by management. These lives have been determined by management based on the expected useful life of assets as disclosed in Note 1 to the financial statements. We evaluated the key factors and assumptions used to develop the depreciation estimate and determined that it is reasonable in relation to the basic financial statements taken as a whole.

- *Estimated Fair Value of Investments:* As of June 30, 2015, cash and investments were measured by fair value. Fair value is essentially market pricing in effect as of June 30, 2015. These fair values are not required to be adjusted for changes in general market conditions occurring subsequent to June 30, 2015.

Disclosures

The financial statement disclosures are neutral, consistent, and clear.

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/certain such misstatements. In addition, none of the misstatements detected as a result of audit procedures and corrected by management were material, either individually or in the aggregate, to each opinion unit's financial statements taken as a whole.

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 auditor's 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 a management representation letter dated September 30, 2015 and updated on December 22, 2015.

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 City's 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 governmental unit's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

Other Information Accompanying the Financial Statements

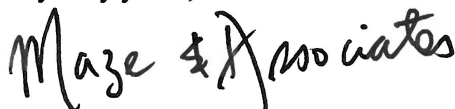
With respect to the supplementary information accompanying the financial statements, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with accounting principles generally accepted in the United 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.

With respect to the required supplementary information accompanying the financial statements, we applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We did not express an opinion nor provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

The Introductory and Statistical Sections included as part of the Comprehensive Annual Financial Report have not been subjected to the auditing procedures applied in the audit of the basic financial statements and, accordingly, we did not express an opinion nor provide any assurance on them.

This information is intended solely for the use of City Council and management and is not intended to be, and should not be, used by anyone other than these specified parties.

Very truly yours,

A handwritten signature in black ink that reads "Maze & Associates". The signature is written in a cursive, flowing style.

Pleasant Hill, California
September 30, 2015