

**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

**(A GOVERNMENTAL FUND OF THE ENEWETAK/  
UJELANG LOCAL GOVERNMENT)**

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**FINANCIAL STATEMENT AND  
INDEPENDENT AUDITORS' REPORT**

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**YEAR ENDED SEPTEMBER 30, 2015**

**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

Year Ended September 30, 2015  
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## **INDEPENDENT AUDITORS' REPORT**

Mayor Jackson Ading  
Enewetak/Ujelang Local Government  
Republic of the Marshall Islands:

### **Report on the Financial Statements**

We have audited the accompanying financial statement of the Enewetak/Ujelang Local Government (EULGOV) Food and Agriculture Support Program (the Program), a governmental fund of EULGOV, which comprises the statement of revenues, expenditures and changes in fund balance for the year ended September 30, 2015, and the related notes to the financial statements.

### ***Management's Responsibility for the Financial Statements***

Management is responsible for the preparation and fair presentation of this financial statement in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

### ***Auditors' Responsibility***

Our responsibility is to express an opinion on the financial statement based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free from material misstatement.

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

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

## **Opinion**

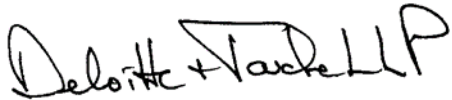
In our opinion, the financial statement referred to above presents fairly, in all material respects, the results of operations of the Program for the year ended September 30, 2015 in accordance with accounting principles generally accepted in the United States of America.

## **Emphasis of Matter - Reporting Entity**

As discussed in Note 1 to the financial statement, the financial statement referred to above presents only the EULGOV Food and Agriculture Support Program and is not intended to present fairly the results of operations of the Enewetak/Ujelang Local Government in accordance with accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

## **Other Reporting Required by *Government Auditing Standards***

In accordance with *Government Auditing Standards*, we have also issued our report dated September 11, 2017, on our consideration of the Program's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financing reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Program's internal control over financial reporting and compliance.

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

September 11, 2017

**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

Statement of Revenues, Expenditures and Changes in Fund Balance  
Year Ended September 30, 2015

Revenues:	
Federal program receipts	\$ <u>2,011,640</u>
Total revenues	<u>2,011,640</u>
Expenditures:	
Direct food costs	667,197
Personnel services	592,260
Petroleum, oil and lube	336,530
Machinery and equipment	110,420
Materials and supplies	83,606
Insurance	67,583
Repairs and maintenance	44,171
Contractual services	31,250
Accommodation and other benefits	21,928
Lady E subsistence	12,685
Equipment rental	7,690
Temporary labor	4,937
Travel	4,146
Office rental	3,600
Communication	2,463
Wharfage and stevedoring	1,900
Training	1,670
Bank charges	36
Miscellaneous	<u>17,568</u>
Total expenditures	<u>2,011,640</u>
Changes in fund balance	-
Fund balance at beginning of year	<u>-</u>
Fund balance at end of year	<u><u>\$ -</u></u>

See accompanying notes to financial statement.

**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

Notes to Financial Statement  
September 30, 2015

(1) Organization

The Enewetak/Ujelang Local Government (EULGOV) was established pursuant to Public Law 1981-2, the Local Government Act of the Republic of the Marshall Islands, and operates under the Constitution of the Enewetak/Ujelang Local Government. EULGOV is governed by an elected mayor and a fifteen-member council. The EULGOV Food and Agriculture Support Program (the Program) is considered a governmental fund of EULGOV and was established to account for funding received pursuant to Section 103(f)(2) of the Compact of Free Association Amendments Act of 2003.

The accompanying financial statement relates solely to those accounting records maintained by the Program, and does not incorporate any accounts related to any other departments or agencies of EULGOV.

(2) Summary of Significant Accounting Policies

The financial statement of the Program has been prepared in conformity with accounting principles generally accepted in the United States of America (GAAP), as applied to government units. The Governmental Accounting Standards Board (GASB) is the accepted standard-setting body for establishing governmental accounting and financial reporting principles. The more significant of the Program's accounting policies are described below.

A. Measurement Focus and Basis of Accounting

The Program reports the results of its operations in one governmental fund. A fund is a separate accounting entity with a self-balancing set of accounts. They are concerned only with the measurement of financial position and are not involved with measurement of results of operations. Fund accounting is designed to demonstrate legal compliance and to aid financial management by segregating transactions related to certain government functions or activities.

Governmental funds are used to account for all or most of a government's general activities, including the collection and disbursement of earmarked monies (special revenue funds).

B. Basis of Presentation

The accounting and financial reporting treatment applied to a fund is determined by its measurement focus. All governmental funds are accounted for using a current financial resources measurement focus. Operating statements of these funds present increases (i.e., revenues and other financing sources) and decreases (i.e., expenditures and other financing uses) in net current assets.

The modified accrual basis of accounting is used by all governmental fund types. Under the modified accrual basis of accounting, revenues are recognized when susceptible to accrual (i.e., when they become both measurable and available). "Measurement" means the amount of the transaction can be determined and "available" means collectible within the current period or soon enough thereafter to be used to pay liabilities of the current period. Expenditures are recorded when the related liability is incurred.

**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

Notes to Financial Statement  
September 30, 2015

(2) Summary of Significant Accounting Policies, Continued

C. Estimates

The preparation of financial statements in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenditures during the reporting period. Actual results could differ from those estimates.

(3) Risk Management

The Program is exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions; injuries to employees; and natural disasters. The Program has elected to purchase commercial automobile and marine insurance from independent third parties for the risks of loss to which it is exposed. For other risks of loss to which it is exposed, the Program has elected not to purchase commercial insurance. Instead, the Program's management believes it is more economical to manage its risks internally. In the event of claim settlements and judgments, the Program reports all of its risk management activities in the General Fund of EULGOV. Claims expenditures and liabilities are reported when it is probable that a loss has occurred and the amount of that loss can be reasonably estimated. These losses include an estimate of claims that have been incurred but not reported. No material losses have resulted from the Program's risk management activities for the past three years.

(4) Contingency

Questioned Costs

The Program is subject to financial and compliance audits to ascertain if Federal laws and guidelines have been followed. Questioned costs have been set forth in the Program's Single Audit Report for the year ended September 30, 2015. In addition, the Program is considered to have responsibility for any questioned costs that may result from Single Audits of the Program for the fiscal years for which audits have not been performed. The ultimate disposition of any questioned costs can be determined only by final action of the grantor agency. Therefore, no provision for any liability that may result upon resolution of these matters has been made in the accompanying financial statement.

**INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS**

Mayor Jackson Ading  
Enewetak/Ujelang Local Government  
Republic of the Marshall Islands:

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statement of the Enewetak/Ujelang Local Government Food and Agriculture Support Program (the Program), which comprises the statement of revenues, expenditures and changes in fund balance for the year ended September 30, 2015, and the related notes to the financial statement, and have issued our report thereon dated September 11, 2017.

### **Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statement, we considered the Program's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statement, but not for the purpose of expressing an opinion on the effectiveness of the Program's internal control. Accordingly, we do not express an opinion on the effectiveness of the Program's internal control.

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

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

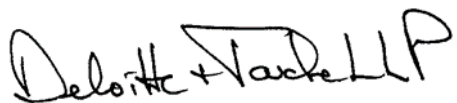


## Compliance and Other Matters

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

## Purpose of this Report

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

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

September 11, 2017

**INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE; AND REPORT ON SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY OMB CIRCULAR A-133**

Mayor Jackson Ading  
Enewetak/Ujelang Local Government  
Republic of the Marshall Islands:

### **Report on Compliance for Each Major Federal Program**

We have audited the Enewetak/Ujelang Local Government Food and Agriculture Support Program's (the Program's) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on the Program's major federal program for the year ended September 30, 2015. The Program's major federal program is identified in the summary of auditors' results section of the accompanying Schedule of Findings and Questioned Costs.

#### ***Management's Responsibility***

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

#### ***Auditors' Responsibility***

Our responsibility is to express an opinion on compliance for the Program's major federal program based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Program's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for the Program's major federal program. However, our audit does not provide a legal determination of the Program's compliance.

## ***Opinion on the Major Federal Program***

In our opinion, the Program complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on its major federal program for the year ended September 30, 2015.

## ***Other Matters***

The results of our auditing procedures disclosed instances of noncompliance, which are required to be reported in accordance with OMB Circular A-133 and which are described in the accompanying Schedule of Findings and Questioned Costs as item 2015-001. Our opinion on the major federal program is not modified with respect to this matter.

The Program's response to the noncompliance findings identified in our audit are described in the accompanying Schedule of Findings and Questioned Costs. The Program's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

## **Report on Internal Control Over Compliance**

Management of the Program is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the Program's internal control over compliance with the types of requirements that could have a direct and material effect on its major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for its major federal program and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Program's internal control over compliance.

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

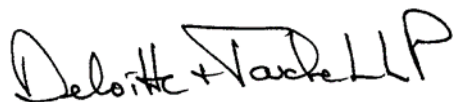
Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, we identified certain deficiencies in internal control over compliance, as described in the accompanying Schedule of Findings and Questioned Costs as item 2015-001 that we consider to be significant deficiencies.

The Program's response to the internal control over compliance findings identified in our audit are described in the accompanying Schedule of Findings and Questioned Costs. The Program's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose.

## **Report on Schedule of Expenditures of Federal Awards Required by OMB Circular A-133**

We have audited the financial statement of the Program for the year ended September 30, 2015, and have issued our report thereon dated September 11, 2017, which contained an unmodified opinion on that financial statement. Our audit was conducted for the purpose of forming an opinion on the financial statement as a whole. The accompanying Schedule of Expenditures of Federal Awards is presented for purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the financial statement. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statement. The information has been subjected to the auditing procedures applied in the audit of the financial statement and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statement or to the financial statement itself, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the Schedule of Expenditures of Federal Awards is fairly stated in all material respects in relation to the financial statement as a whole.

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September 11, 2017

**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

Schedule of Expenditures of Federal Awards  
Year Ended September 30, 2015

	<u>Beginning Fund Balance</u>	<u>2015 Funds Received</u>	<u>2015 Funds Expended</u>	<u>Ending Fund Balance</u>
<u>U.S. Department of the Interior</u> <u>CFDA #15.875</u>				
Funds received in a direct capacity:				
Economic, Social and Political Development of the Territories: Operation of the Enewetak Food and Agriculture Support Program				
	\$ <u>          -</u>	\$ <u>2,011,640</u>	\$ <u>2,011,640</u>	\$ <u>          -</u>

See accompanying notes to schedule of expenditures of federal awards.

**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

Notes to Schedule of Expenditures of Federal Awards  
Year Ended September 30, 2015

(1) Organization

The Program is the recipient of non-Compact of Free Association related funds received from the U.S. Department of the Interior. These funds must be expended in accordance with grant awards and are subject to general U.S. federal requirements, including OMB's Circular A-87 and Circular A-102.

(2) Summary of Significant Accounting Policies

Basis of Accounting

The accompanying Schedule of Expenditures of Federal Awards includes the federal grant activity of the Program and is presented on the modified accrual basis of accounting. The information in this schedule is presented in accordance with the requirements of OMB Circular A-133, *Audits of States, Local Governments and Non-Profit Organizations*.

**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

Schedule of Findings and Questioned Costs  
Year Ended September 30, 2015

**Section I - Summary of Auditor's Results**

*Financial Statements*

- |    |   |               |
|----|---|---------------|
| 1. | Type of auditors' report issued:                      | Unmodified    |
|    | Internal control over financial reporting:            |               |
| 2. | Material weakness(es) identified?                     | No            |
| 3. | Significant deficiency(ies) identified?               | None reported |
| 4. | Noncompliance material to financial statements noted? | No            |

*Federal Awards*

- |     |  |            |
|-----|--|------------|
|     | Internal control over major federal programs:  |            |
| 5.  | Material weakness(es) identified?  | No         |
| 6.  | Significant deficiency(ies) identified?  | Yes        |
| 7.  | Type of auditors' report issued on compliance for major federal programs:  | Unmodified |
| 8.  | Any audit findings disclosed that are required to be reported in accordance with Section 510(a) of OMB Circular A-133? | Yes        |
| 9.  | Identification of major federal programs:  |            |
|     | <u>CFDA #Name of Federal Program or Cluster</u>  |            |
|     | 15.875 Economic, Social and Political Development of the Territories:<br>Enewetak Food and Agriculture Support Program |            |
| 10. | Dollar threshold used to distinguish between Type A and Type B programs:   | \$ 300,000 |
| 11. | Auditee qualified as a low-risk auditee?   | No         |

**Section II - Financial Statement Findings**

No matters are reportable.

**Section III - Federal Award Findings and Questioned Costs**

Reference Number	CFDA #	Finding	Questioned Costs
2015-001	15.875	Allowable Costs/Cost Principles Procurement and Suspension and Debarment	\$ 10,000

**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

Schedule of Findings and Questioned Costs, Continued  
Year Ended September 30, 2015

Finding No.: 2015-001  
Federal Agency: U.S. Department of the Interior  
CFDA Program: 15.875 Economic, Social and Political Development of the Territories:  
Enewetak Food and Agriculture Support Program  
Area: Allowable Costs/Cost Principles  
Area: Procurement and Suspension and Debarment  
Questioned Costs: \$10,000

Criteria: Expenditures incurred under federal programs should be in accordance with allowable costs/cost principles requirements and should be directly related to, and in accordance with, program intent and objectives. Additionally, costs incurred for common or joint purposes should be allocated to the Program based on a predetermined methodology. Lastly, purchases less than \$100,000 require evidence of informal bidding procedures. For purchases greater than \$100,000, formal bidding procedures are required.

Condition: During the year ended September 30, 2015, the Program incurred \$10,000 of contractual services for professional fees. No evidence of informal bidding procedures or invoices to support the fees incurred were provided by management.

Cause: The cause of the above condition is the lack of support evidencing informal or formal procedures for the procurement of goods and services and the lack of basis for allocating costs to the program.

Effect: The effect of the above condition is noncompliance with allowable costs/cost principles and procurement requirements as stipulated in the grant award. Accordingly, questioned costs of \$10,000 result.

Recommendation: We recommend that management verify that expenditures allocated to the Program are directly related to and are in accordance with program intent and objectives and are in compliance with federal procurement requirements.

Auditee Response and Corrective Action Plan:

We disagree with the proposition that there was a lack of basis for allocating these costs to the program. The professional fees were paid to David Cohen in his role as consultant. His contract requires him to perform several duties with respect to the Program, including:

- Prepare documents to comply with the reporting requirement relating to the agriculture, transportation and food purchase activity;
- Coordinate with the Government' s accountant on all such reporting and recordkeeping;
- Coordinate with the Government's agriculture field manager at Enewetak with regard to work performed on quarterly basis; work with such field manager to develop annual performance goals and to complete surveys to establish a baseline for future performance measurement;
- Prepare an annual report on the Program and all its components for the U.S. Department of the Interior;
- Perform such other work relating to the Program as required by the Mayor.



**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

Schedule of Findings and Questioned Costs, Continued  
Year Ended September 30, 2015

Finding No.: 2015-001, Continued  
Federal Agency: U.S. Department of the Interior  
CFDA Program: 15.875 Economic, Social and Political Development of the Territories:  
Enewetak Food and Agriculture Support Program  
Area: Allowable Costs/Cost Principles  
Area: Procurement and Suspension and Debarment  
Questioned Costs: \$10,000

Auditee Response and Corrective Action Plan: , Continued

These duties are substantially identical to the duties of our previous two consultants that assisted us with the Program, going back to 2006. And we would note that the compensation of these consultants that was charged to the Program is the same as the compensation to Mr. Cohen that is being charged to the program. Since the duties and compensation of Mr. Cohen with respect to the Program is essentially the same as that for those who performed identical duties going back to 2006, we disagree that there is a lack of basis for allocating these costs to the program. Notwithstanding this disagreement, we will take the steps suggested in your report to address your concerns going forward.

Also, your report cites "the lack of support evidencing informal or formal procedures for the procurement of goods and services." We note that Mr. Cohen possesses important qualifications this role that are virtually unique: He served from 2002 to 2008 as Deputy Assistant Secretary of the Interior for Insular Affairs, and in that capacity headed the office that administers the Program. Mr. Cohen has also been an attorney since 1986 and previously was a partner at two major international law firms: Sidley Austin and Davis Wright Tremaine. It would have been impossible for us to find another consultant who could replicate Mr. Cohen's knowledge of the Program and the legal requirements relating thereto. We note that 2 CFR section 200.320(f)(1) authorizes procurement by a noncompetitive proposal when "[t]he item is available only from a single source." We believe that, given Mr. Cohen's unique qualifications, the value he brings to us as a consultant is available only from him.

However, to address your concerns, we agree to bid the contract under informal bidding procedures as set forth in the applicable federal regulations.

Auditor Response: We reiterate the recommendation that expenditures allocated to the Program be directly related to and be in accordance with program intent and objectives. Moreover, procurement documentation should indicate the history of procurement, including the rationale for vendor selection.

**ENEWETAK/UJELANG LOCAL GOVERNMENT  
FOOD AND AGRICULTURE SUPPORT PROGRAM**

Summary Schedule of Prior Audit Findings and Questioned Costs  
Year Ended September 30, 2015

There were no unresolved prior audit findings and questioned costs.