REPUBLIC OF PALAU

INDEPENDENT AUDITORS' REPORTS ON
INTERNAL CONTROL AND ON COMPLIANCE

YEAR ENDED SEPTEMBER 30, 2018
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

His Excellency Tommy E. Remengesau Jr.
President
Republic of Palau:

We have audited, 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, the financial statements of the governmental activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the Republic of Palau (the Republic) as of and for the year ended September 30, 2018, and the related notes to the financial statements, which collectively comprise the Republic’s basic financial statements, and have issued our report thereon dated June 30, 2019. Our report includes a reference to other auditors and emphasis-of-matters paragraphs regarding implementation of new accounting standards and an uncertainty. Other auditors audited the financial statements of Palau International Coral Reef Center, Palau Community College, Palau National Communications Corporation, Belau Submarine Cable Corporation, and Palau District Housing Authority, as described in our report on the Republic's financial statements. This report does not include the results of the other auditors’ testing of internal control over financial reporting or compliance and other matters that are reported on separately by those other auditors.

For purposes of this report, our consideration of internal control over financial reporting and our tests of compliance with certain provisions of laws, regulations, contracts and grants, and other matters did not include the Republic of Palau Social Security Retirement Fund, the Republic of Palau Civil Service Pension Trust Fund, National Development Bank of Palau, Palau Visitors Authority, Palau Public Utilities Corporation, and the Protected Areas Network Fund, which were all audited by us. We have issued separate reports on our consideration of internal control over financial reporting and our tests of compliance with certain provisions of laws, regulations, contracts, and grant agreements, and other matters for these entities. Other auditors issued separate reports on their consideration of internal control over financial reporting and their tests of compliance with certain provisions of laws, regulations, contracts, and grant agreements, and other matters for Palau International Coral Reef Center, Palau Community College, Palau National Communications Corporation, Belau Submarine Cable Corporation, and Palau District Housing Authority. The findings, if any, included in those reports are not included herein.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Republic’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 opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Republic’s internal control. Accordingly, we do not express an opinion on the effectiveness of the Republic’s internal control.
Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that have not been identified. However, as described in the accompanying Schedule of Findings and Questioned Costs, we did identify certain deficiencies in internal control that we consider to be material weaknesses and significant deficiencies.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity’s financial statements will not be prevented, or detected and corrected on a timely basis. We consider the deficiencies described in the accompanying Schedule of Findings and Questioned Costs as items 2018-001, 2018-003, 2018-004, and 2018-006 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 described in the accompanying Schedule of Findings and Questioned Costs as item 2018-005 to be a significant deficiency.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Republic’s financial statements are 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 instances of noncompliance or other matters that are required to be reported under Government Auditing Standards and which are described in the accompanying Schedule of Findings and Questioned Costs as item 2018-001.

The Republic’s Response to Findings

The Republic’s response to the findings identified in our audit is described in the accompanying Corrective Action Plan. The Republic’s response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

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.

June 30, 2019
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 THE UNIFORM GUIDANCE

His Excellency Tommy E. Remengesau Jr.
President
Republic of Palau:

Report on Compliance for Each Major Federal Program

We have audited the Republic of Palau’s (the Republic’s) compliance with the types of compliance requirements described in the OMB Compliance Supplement that could have a direct and material effect on each of the Republic’s major federal programs for the year ended September 30, 2018. The Republic’s major federal programs are identified in the summary of auditors’ results section of the accompanying Schedule of Findings and Questioned Costs.

As discussed in Note 3B to the Schedule of Expenditures of Federal Awards, the Republic’s basic financial statements include the operations of certain entities whose federal awards are not included in the accompanying Schedule of Expenditures of Federal Awards for the year ended September 30, 2018. Our audit, described below, did not include the operations of the entities identified in Note 3B as these entities conducted separate audits in accordance with Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), if required.

Management’s Responsibility

Management is responsible for compliance with the federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

Auditors’ Responsibility

Our responsibility is to express an opinion on compliance for each of the Republic’s major federal programs 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 the audit requirements of the Uniform Guidance. Those standards and the Uniform Guidance 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 Republic'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 qualified and unmodified opinions on compliance for major federal programs. However, our audit does not provide a legal determination of the Republic’s compliance.
Basis for Qualified Opinion on CFDA 93.898

As described in items 2018-003 in the accompanying Schedule of Findings and Questioned Costs, the Republic did not comply with requirements regarding the following:

<table>
<thead>
<tr>
<th>Finding #</th>
<th>CFDA #</th>
<th>Program (or Cluster) Name</th>
<th>Compliance Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018-003</td>
<td>93.898</td>
<td>Cancer Prevention and Control Programs for State, Territorial and Tribal Organizations</td>
<td>Matching, Level of Effort, Earmarking</td>
</tr>
</tbody>
</table>

Compliance with such requirements is necessary, in our opinion, for the Republic to comply with the requirements applicable to that program.

Qualified Opinion on CFDA 93.898

In our opinion, except for the noncompliance described in the Basis for Qualified Opinion paragraph, the Republic complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on CFDA 93.898 Cancer Prevention and Control Programs for State, Territorial and Tribal Organizations for the year ended September 30, 2018.

Unmodified Opinion on Each of the Other Major Federal Programs

In our opinion, the Republic complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its other major federal programs identified in the summary of auditors’ results section of the accompanying Schedule of Findings and Questioned Costs for the year ended September 30, 2018.

Other Matters

The results of our auditing procedures disclosed other instances of noncompliance which are required to be reported in accordance with the Uniform Guidance and which are described in the accompanying Schedule of Findings and Questioned Costs as items 2018-001 and 2018-002. Our opinion on each major federal program is not modified with respect to these matters.

The Republic’s response to the noncompliance findings identified in our audit is described in the accompanying Corrective Action Plan. The Republic’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 Republic 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 Republic’s internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, 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 Republic’s internal control over compliance.
Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph 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 have not been identified. However, as discussed below, we did identify certain deficiencies in internal control over compliance that we consider to be material weaknesses and significant deficiencies.

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 a combination of deficiencies, in internal control over compliance, such that there is a 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. We consider the deficiencies in internal control over compliance described in the accompanying Schedule of Findings and Questioned Costs as item 2018-003 to be material weaknesses.

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. We consider the deficiencies in internal control over compliance described in the accompanying Schedule of Findings and Questioned Costs as items 2018-001 and 2018-002 to be significant deficiencies.

The Republic’s response to the internal control over compliance findings identified in our audit is described in the accompanying Corrective Action Plan. The Republic’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 the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.
Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

We have audited the financial statements of the governmental activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the Republic as of and for the year ended September 30, 2018, and the related notes to the financial statements, which collectively comprise the Republic's basic financial statements. We issued our report thereon dated June 30, 2019, which contained unmodified opinions on those financial statements, and which report included a reference to other auditors and emphasis-of-matters paragraphs regarding implementation of new accounting standards and an uncertainty. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. The accompanying Schedule of Expenditures of Federal Awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the basic financial statements. 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 basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements themselves, 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 basic financial statements as a whole.

June 30, 2019
<table>
<thead>
<tr>
<th>Federal Grantor/Pass-Through Grantor/Program Title</th>
<th>CFDA Number</th>
<th>Federal Expenditures</th>
<th>Pass-Through Federal Grantor/Pass-Through Grantor/Program Title</th>
<th>CFDA Number</th>
<th>Federal Expenditures</th>
<th>Pass-Through Federal Grantor/Pass-Through Grantor/Program Title</th>
<th>CFDA Number</th>
<th>Federal Expenditures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Facilities Loans and Grants</td>
<td>10.766</td>
<td>25,312</td>
<td></td>
<td></td>
<td></td>
<td>Total U.S. Department of Agriculture</td>
<td></td>
<td>27,054</td>
</tr>
<tr>
<td>Total U.S. Department of Commerce</td>
<td></td>
<td>542,272</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total U.S. Department of Labor</td>
<td></td>
<td>278,592</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total U.S. Department of Education</td>
<td></td>
<td>2,052,362</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## U.S. Department of Health and Human Services:

### Direct Programs:
- **Public Health Emergency Preparedness**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.069
  - Federal Expenditures: 297,569
- **Affordable Care Act (ACA) Personal Responsibility Education Program**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.092
  - Federal Expenditures: 283,722
- **Material and Child Health Federal Consolidated Programs**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.110AR
  - Federal Expenditures: 66,680
- **Project Grants and Cooperative Agreements for Tuberculosis Control Programs**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.116
  - Federal Expenditures: 347,471
- **Emergency Medical Services for Children**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.127
  - Federal Expenditures: 70,791
- **Health Center Program Cluster:**
  - **Health Center Program**
    - Federal Grantor: U.S. Department of Health and Human Services
    - CFDA Number: 93.224
    - Federal Expenditures: 1,031,372
- **Subtotal Health Center Program Cluster**
  - Federal Expenditures: 1,031,372
- **Substance Abuse and Mental Health Services Projects of Regional and National Significance**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.243
  - Federal Expenditures: 1,126,983
- **Universal Newborn Hearing Screening**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.251
  - Federal Expenditures: 223,948
- **Immunization Cooperative Agreements**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.268
  - Federal Expenditures: 235,645
- **Epidemiology and Laboratory Capacity for Infectious Disease (ELC)**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.323
  - Federal Expenditures: 453,383
- **Medical Assistance Program**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.778
  - Federal Expenditures: 141,690
- **Hospital Preparedness Program (HPP) Ebola Preparedness and Response Activities**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.817
  - Federal Expenditures: 46,217
- **Cancer Prevention and Control Programs for State, Territorial, and Tribal Organizations**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.898
  - Federal Expenditures: $ 909,122
- **HIV Care Formula Grants**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.917
  - Federal Expenditures: 24,068
- **Assistance Programs for Chronic Disease Prevention and Control**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.945
  - Federal Expenditures: 222,619
- **Block Grants for Community Mental Health Services**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.958
  - Federal Expenditures: 47,097
- **Block Grants for Prevention and Treatment of Substance Abuse**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.959
  - Federal Expenditures: 81,737
- **Preventive Health and Health Services Block Grant**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.991
  - Federal Expenditures: 25,621
- **Maternal and Child Health Services Block Grant to the States**
  - Federal Grantor: U.S. Department of Health and Human Services
  - CFDA Number: 93.994
  - Federal Expenditures: 198,519

### Subtotal Direct Programs:
- Federal Expenditures: 6,109,189

### Pass Through Programs:
- **Pass Through From University of Hawaii:**
  - Federal Grantor: University of Hawaii
  - CFDA Number: 99-6000354
  - Federal Expenditures: 6,109,189
- **PPHF: Racial and Ethnic Approaches to Community Health Program**
  - Federal Grantor: University of Hawaii
  - CFDA Number: 93.738
  - Federal Expenditures: 6,192
- **Center for Disease Control and Prevention Investigations and Technical Assistance (Palau Cancer Registry)**
  - Federal Grantor: University of Hawaii
  - CFDA Number: 93.283
  - Federal Expenditures: 10,493
- **Building Capacity of the Public Health System to Improve Population Health through National, Nonprofit Organizations- financed in part by Prevention and Public Health Funds (PPHF)**
  - Federal Grantor: University of Hawaii
  - CFDA Number: 35-1044487
  - Federal Expenditures: 37,573

### Subtotal Pass-Through Programs:
- Federal Expenditures: 54,258

### Total U.S. Department of Health and Human Services:
- Federal Expenditures: 6,163,447

### Total Federal Grants (Fund 350100):
- Federal Expenditures: 9,063,727

## U.S. Department of the Interior:

### Direct Program:
- **Economic, Social, and Political Development of the Territories**
  - Federal Grantor: U.S. Department of the Interior
  - CFDA Number: 15.875
  - Federal Expenditures: 827,969

### Total U.S. Department of the Interior:
- Federal Expenditures: 827,969

### Total U.S. Federal Grants Fund (Fund 350200):
- Federal Expenditures: 827,969

## U.S. Department of Transportation:

### Direct Program:
- **Airport Improvement Program**
  - Federal Grantor: U.S. Department of Transportation
  - CFDA Number: 20.106
  - Federal Expenditures: 386,498

### Total U.S. Department of Transportation:
- Federal Expenditures: 386,498

### Total Federal Grants Fund (Fund 420100):
- Federal Expenditures: 386,498
<table>
<thead>
<tr>
<th>Economic, Social and Political Development of the Territories</th>
<th>Authorizations</th>
<th>Passed Through to Subrecipients</th>
<th>Expenditures and Transfers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compact of Free Association CFDA #15.875</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>211(a) &amp; 215 Compact Current Account</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compact Section 211(a)</td>
<td>$ 19,426,909</td>
<td>$</td>
<td>$ 19,426,909</td>
</tr>
<tr>
<td>Compact Section 215</td>
<td>5,147,000</td>
<td></td>
<td>5,147,000</td>
</tr>
<tr>
<td><strong>Total 211(a) &amp; 215 Current Account</strong></td>
<td>$ 24,573,909</td>
<td>$</td>
<td>$ 24,573,909</td>
</tr>
<tr>
<td><strong>211(f) Trust Fund</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Executive Branch</td>
<td>$ 5,000,000</td>
<td>$</td>
<td>$ 5,000,000</td>
</tr>
<tr>
<td><strong>Total 211(f) Trust Fund</strong></td>
<td>$ 5,000,000</td>
<td>$</td>
<td>$ 5,000,000</td>
</tr>
<tr>
<td><strong>221(b)(1) &amp; (2) Special Block Grant &amp; Education Special Grant</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ministry of Education</td>
<td>$ 2,000,000</td>
<td>$</td>
<td>$ 2,000,000</td>
</tr>
<tr>
<td><strong>Total 221(b) Special Block Grant</strong></td>
<td>$ 2,000,000</td>
<td>$</td>
<td>$ 2,000,000</td>
</tr>
<tr>
<td><strong>Total Compact of Free Association CFDA #15.875</strong></td>
<td></td>
<td></td>
<td>$ 31,573,909</td>
</tr>
<tr>
<td><strong>Less Compact Section 211(a) Current Account</strong></td>
<td></td>
<td>(19,426,909)</td>
<td></td>
</tr>
<tr>
<td><strong>Less Compact Section 215 Current Account</strong></td>
<td></td>
<td>(5,147,000)</td>
<td></td>
</tr>
<tr>
<td><strong>Less Compact Section 211(f) Trust Fund Investment Earnings</strong></td>
<td></td>
<td>(5,000,000)</td>
<td></td>
</tr>
<tr>
<td><strong>Total Compact of Free Association CFDA #15.875</strong></td>
<td></td>
<td>$ 2,000,000</td>
<td>$ 2,000,000</td>
</tr>
<tr>
<td><strong>expenditures subject to detailed compliance testing</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total Expenditures of Federal Awards</strong></td>
<td></td>
<td>$</td>
<td>$ 12,278,194</td>
</tr>
</tbody>
</table>

The above awards are received in a direct capacity.

Reconciliation to financial statements:

- **Total Expenditures of Federal Awards** $12,278,194
- **CFDA 15.875 COFA Section 221(b)** (2,000,000)
- **Non-Federal Grants** 9,567,781

**Total Special Revenue Grants expenditures** $19,845,975

See accompanying notes to schedule of expenditures of federal awards.
1. **Scope of Audit**

Republic of Palau (the “Republic”) is a governmental entity governed by its own Constitution. All significant operations of the Republic are included within the scope of the Single Audit. The U.S. Department of the Interior has been designated as the Republic's cognizant agency for the Single Audit.

2. **Basis of Presentation**

The accompanying Schedule of Expenditures of Federal Awards (the Schedule) includes the federal award activity of the Republic under programs of the federal government for the year ended September 30, 2018. The information in this Schedule is presented 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 (Uniform Guidance)*. Because the Schedule presents only a selected portion of the operations of the Republic, it is not intended to and does not present the financial positions or changes in financial positions of the Republic.

3. **Summary of Significant Accounting Policies**

   **A. Basis of Accounting**

   All expenditures and capital outlays that represent the federal share are reported as expenditures. Expenditures reported on the Schedule are reported on the modified accrual basis of accounting, consistent with the manner in which the Republic maintains its accounting records. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. Pass-through entity identifying numbers are presented where available.

   **B. Reporting Entity**

   For purposes of complying with the Single Audit Act of 1984, as amended in 1996, the Republic's reporting entity is defined in Note 1A to its September 30, 2018 basic financial statements; except that the Republic of Palau Social Security Retirement Fund, the Republic of Palau Civil Service Pension Trust Fund, and all of the discretely presented component units are excluded. Accordingly, the accompanying Schedule presents the federal award programs administered by the Republic, as defined above, for the year ended September 30, 2018.

   The following component units incurred federal expenditures during the year ended September 30, 2018:

   - Palau Community College $ 3,375,889
   - Palau Public Utilities Corporation $ 45,000

   **C. Matching Costs**

   Matching costs, i.e., the non-federal share of certain program costs, are not included in the accompanying Schedule.
3. **Summary of Significant Accounting Policies, Continued**

**D. Indirect Cost Allocation**

The Republic did not elect to use the de minimis indirect cost rate allowed under the Uniform Guidance. The Republic has entered into an approved indirect cost negotiation agreement covering fiscal year 2018. The approved rate was 3.61%. Federal programs were charged for indirect costs at the approved rate, unless awards specified a lower allowable rate.

**E. CFDA #15.875**

CFDA #15.875 represents the Office of Insular Affairs (OIA), U.S. Department of the Interior. Funding from this source is subject to varying rules and regulations since OIA administers the Compact of Free Association (Compact), which is a treaty, and is not a federal program. The Compact is comprised of various funded programs, each with separate compliance requirements. To maximize audit coverage of OIA funding, the U.S. Department of the Interior, Office of the Inspector General (OIG) has recommended that programs administered under CFDA #15.875 be grouped by like compliance requirements and such groupings be separately evaluated for purposes of major program determinations.
Section I - Summary of Auditors’ Results

Financial Statements

1. Type of report the auditor issued on whether the financial statements audited were prepared in accordance with GAAP: Unmodified

   Internal control over financial reporting:

2. Material weakness(es) identified? Yes
3. Significant deficiency(ies) identified? Yes
4. Noncompliance material to financial statements noted? Yes

Federal Awards

   Internal control over major federal programs:

5. Material weakness(es) identified? Yes
6. Significant deficiency(ies) identified? Yes
7. Type of auditors’ report issued on compliance for major federal programs:

   CFDA 93.898 Qualified
   All other major federal programs Unmodified

8. Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)? Yes

9. Identification of major federal programs:


<table>
<thead>
<tr>
<th>CFDA Numbers</th>
<th>Name of Federal Program or Cluster</th>
</tr>
</thead>
<tbody>
<tr>
<td>84.027</td>
<td>Special Education Cluster (IDEA)</td>
</tr>
<tr>
<td>93.224</td>
<td>Health Center Program Cluster</td>
</tr>
<tr>
<td>93.243</td>
<td>Substance Abuse and Mental Health Services - Projects of Regional and National Significance</td>
</tr>
<tr>
<td>93.898</td>
<td>Cancer Prevention and Control Programs for State, Territorial, and Tribal Organizations</td>
</tr>
<tr>
<td>93.994</td>
<td>Maternal and Child Health Services Block Grant to the States</td>
</tr>
<tr>
<td>15.875</td>
<td>Economic, Social, and Political Development of the Territories</td>
</tr>
<tr>
<td>15.875</td>
<td>Economic, Social, and Political Development of the Territories – Compact of Free Association Compact Sector Grants</td>
</tr>
</tbody>
</table>

10. Dollar threshold used to distinguish between Type A and Type B Programs: $750,000

11. Auditee qualified as low-risk auditee? No
Section II – Financial Statement Findings

<table>
<thead>
<tr>
<th>Finding Number</th>
<th>Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018-001</td>
<td>Equipment and Real Property Management</td>
</tr>
<tr>
<td>2018-003</td>
<td>Matching</td>
</tr>
<tr>
<td>2018-004</td>
<td>Financial Statements</td>
</tr>
<tr>
<td>2018-005</td>
<td>Local Noncompliance – Procurement Regulations</td>
</tr>
<tr>
<td>2018-006</td>
<td>Net Pension Liability</td>
</tr>
</tbody>
</table>

Section III – Federal Award Findings and Questioned Costs

<table>
<thead>
<tr>
<th>Finding Number</th>
<th>CFDA #</th>
<th>Findings</th>
<th>Questioned Costs</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018-001</td>
<td>15.875</td>
<td>Equipment and Real Property Management</td>
<td>$</td>
</tr>
<tr>
<td>2018-002</td>
<td>93.224</td>
<td>Special Tests and Provisions - Sliding Fee Discounts</td>
<td>-</td>
</tr>
<tr>
<td>2018-001</td>
<td>93.243</td>
<td>Equipment and Real Property Management</td>
<td>-</td>
</tr>
<tr>
<td>2018-001</td>
<td>93.898</td>
<td>Equipment and Real Property Management</td>
<td>174,130</td>
</tr>
<tr>
<td>2018-003</td>
<td>93.898</td>
<td>Matching, Level of Effort, Earmarking</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>$174,130</td>
</tr>
</tbody>
</table>
Finding No.: 2018-001
CFDA Program: DOI 15.875 Economic, Social and Political Development of the Territories
Federal Award No.: D17AP00099

CFDA Program: HHS 93.243 Substance Abuse and Mental Health Services_Projects of Regional and National Significance
Federal Award No.: 5U79SP020164-04, 5U79SP020164-05

CFDA Program: HHS 93.898 Cancer Prevention and Control Programs for State, Territorial, and Tribal Organizations
Federal Award No.: NU58DP006289-01-00, NU58DP006289-02-00
Area: Equipment and Real Property Management
Questioned Costs: $-0-

Criteria: In accordance with applicable equipment and real property management requirements, the Republic must follow the Republic’s laws and regulations. The Republic’s property management policies and procedures Chapter IV (Executive Order no. 217) require the following:

- Accountable officers will be responsible for ensuring the proper and effective maintenance, control and safeguarding of government property assigned to or utilized by their respective entities (section 202.3).
- Accountable officers will maintain complete property management records, and the physical inventory must take place annually (section 203.7).
- After completing the physical count and reconciliation, the Accountable Officer will certify in writing to the Chief of Division of Property and Supply (P&S) that the physical inventory has been completed and subsidiary property records reflect actual quantities on hand (section 203.8).

Conditions:

CFDA #15.875

One (or 14%) of seven expenditures tested represented capitalizable equipment which was not on the program’s capital asset listing as of September 30, 2018. The asset was subsequently added to the listing as a result of the audit process, as follows:

<table>
<thead>
<tr>
<th>Description</th>
<th>Date received</th>
<th>Tag Number</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scanner</td>
<td>02/16/2018</td>
<td>RP-4692</td>
<td>$28,980</td>
</tr>
</tbody>
</table>

CFDA #93.243

1. A reconciliation between the Program and P&S does not appear to have been performed, as there is a variance of $27,293.

2. A control deficiency exists with respect to inventory. Procurement & Supply revised the equipment listing after we informed them that the cost of certain equipment should be $40,431 versus $36,661, a difference of $3,770 (Asset Tag# RP-4609). After further research, P&S agreed and subsequently updated the cost.

3. Support was not provided to verify that the program’s equipment, including Information Technology items, are maintained and safeguarded.
CFDA #93.898

1. Of six program capital assets tested, aggregating $205,759 of $239,004 in total capital assets as of September 30, 2018, we noted the following deficiencies:

   a. One (or 17%) was indicated to be in good condition and located in the Administration section; however, the asset could not be located. In addition, the program inventory custodian represented that the asset was inoperable. Details follow:

      | Description | Acquisition Date | Tag No. | Org No. | Acquisition Cost | Location | Condition |
      |-------------|------------------|---------|---------|-----------------|----------|-----------|
      | Copier     | 08/02/2004       | RP-3473 | 3683    | $9,995          | Administration | Good     |

   b. One (or 17%) was inoperable and has been at a repair shop for approximately 17 months. The program inventory custodian represented that the asset was awaiting parts; however, no documentation was on file evidencing that the parts were actually ordered. Details follow:

      | Description | Acquisition Date | Tag No. | Org No. | Acquisition Cost | Condition |
      |-------------|------------------|---------|---------|-----------------|----------|
      | Van LP #1063| 06/25/2007       | RP-3699 | 3683    | $32,375         | Poor     |

   c. One (or 17%) was noted as being inoperable. The program inventory custodian represented that the program submitted a request for maintenance; however, no documentation was on file evidencing repair status. Details follow:

      | Description | Acquisition Date | Tag No. | Org No. | Acquisition Cost | Condition |
      |-------------|------------------|---------|---------|-----------------|----------|
      | Pick-up LP #1233 | 12/28/2011    | RP-4098 | 3683    | $33,795         | Poor     |
Finding No.: 2018-001, Continued
CFDA Program: DOI 15.875 Economic, Social and Political Development of the Territories
Federal Award No.: D17AP00099
CFDA Program: HHS 93.243 Substance Abuse and Mental Health Services_Projects of Regional and National Significance
Federal Award No.: 5U79SP020164-04, 5U79SP020164-05
CFDA Program: HHS 93.898 Cancer Prevention and Control Programs for State, Territorial, and Tribal Organizations
Federal Award No.: NU58DP006289-01-00, NU58DP006289-02-00
Area: Equipment and Real Property Management
Questioned Costs: $-0-

Cause:
CFDA #15.875: The Republic did not periodically reconcile capital assets with property records.

CFDA #93.243: The Republic did not enforce compliance with applicable equipment and real property management requirements.

CFDA #93.898: The Republic did not appear to perform adequate maintenance of program capital assets.

Effect: The Republic is in noncompliance with applicable equipment and real property management requirements. No questioned cost is presented, as we are unable to quantify the extent of the noncompliance. See below for cumulative dollar amount of property and equipment acquired with program grant funds.

<table>
<thead>
<tr>
<th>CFDA No.</th>
<th>2018</th>
<th>2017</th>
<th>2016</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>15.875</td>
<td>$28,980</td>
<td>$7,200</td>
<td>$63,148</td>
<td>$99,328</td>
</tr>
<tr>
<td>93.243</td>
<td>$9,950</td>
<td>$499,264</td>
<td>$27,553</td>
<td>$536,767</td>
</tr>
<tr>
<td>93.898</td>
<td>$-</td>
<td>$52,520</td>
<td>$-</td>
<td>$52,520</td>
</tr>
</tbody>
</table>

Recommendation: The Republic should consider identifying a fixed asset team and providing training on applicable equipment and real property management requirements, including documentation requirements. The responsible personnel should coordinate and conduct the required annual physical inventories and should reconcile results to the property records in accordance with applicable equipment and real property management requirements. Further, creating an inspection checklist should be considered for the maintenance and upkeep of IT-related equipment. Adequate maintenance of federally funded equipment should be performed to comply with applicable equipment and property management requirements.

Identification as a Repeat Finding: 2017-005

Views of Auditee and Planned Corrective Actions:
The Republic describes corrective action plans in the auditee-prepared Corrective Action Plan.
Finding No.: 2018-002  
Federal Agency: U.S. Department of Health and Human Services  
CFDA Program: 93.224 Health Center Program Cluster  
Federal Award No.: 6H80CS02467-32-13, 6H80CS02467-32-05, 6H80CS02467-32-10, 6H80CS02467-33-03  
Area: Special Tests and Provisions – Sliding Fee Discounts  
Questioned Costs: $0

Criteria: In accordance with applicable special tests and provisions requirements for Sliding Fee Discounts, health centers must prepare and apply a sliding fee discount schedule (SFDS) so that the amounts owed for health center services by eligible patients are adjusted (discounted) based on the patient’s ability to pay.

Condition: Based on tests of internal controls, it appears that health center services are not distinguished from services performed at the National Hospital. The Health Center Program (HCP) does not have a separate receipts system in place such that amounts billed for outpatient care are co-mingled with the hospital and are then split evenly between the program and the National Hospital. We were provided the Palau Community Health Center (CHC) Governing Board minutes on August 7, 2018, which approved that all specialty clinics be placed under the CHC Administration. The minutes further stated that all program income, including all collections from each CHC site, including the outpatient department (OPD), would be fully collected and be administered by the program. However, such policy has not been implemented.

Cause: The Republic lacks a receipts system that segregates program services from services performed at the National Hospital.

Effect: The Republic is in noncompliance with the special tests and provisions requirement for sliding fee discounts. No questioned costs are presented as we are unable to quantify the extent of noncompliance related to the sliding fee discounts provision.

Recommendation: The Republic should implement a system to identify program receipts, including the pertinent system described in CHC Governing Board resolutions.

Identification as a Repeat Finding: 2017-003

Views of Auditee and Planned Corrective Actions:

The Republic describes corrective action plans in the auditee-prepared Corrective Action Plan.
Finding No.: 2018-003
CFDA Program: 93.898 Cancer Prevention and Control Programs for State, Territorial, and Tribal Organizations
Grant Number: NU58DP006289-01-00, NU58DP006289-02-00
Area: Matching, Level of Effort, Earmarking
Questioned Costs: $174,130

**Criteria:** In accordance with grant requirements, the recipient must be able to account separately for stewardship of the federal funding and for any required matching; it is subject to monitoring, oversight, and audit. The required cost-sharing ratio for the National Breast and Cervical Cancer Early Detection Program (NCCEDP) program is 3:1, or a local match equal to 1/3 of total program funds awarded during the fiscal year.

**Condition:** The local match of $232,990 required by the grant was only partially supported with adequate records and therefore a portion was not met during the year ended September 30, 2018.

<table>
<thead>
<tr>
<th>Grant No.</th>
<th>FY18 NBCCEDP Funds Awarded</th>
<th>Cost-share Ratio for Local Match</th>
<th>FY2018 Required Local Match</th>
<th>Actual Match</th>
<th>FY2018 Unmet Match</th>
</tr>
</thead>
<tbody>
<tr>
<td>NU58DP006289-01-00</td>
<td>$568,800</td>
<td>1/3</td>
<td>$189,600</td>
<td>$58,860</td>
<td>$130,740</td>
</tr>
<tr>
<td>NU58DP006289-02-00</td>
<td>$130,169</td>
<td>1/3</td>
<td>43,390</td>
<td></td>
<td>43,390</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>$232,990</td>
<td>$58,860</td>
<td>$174,130</td>
</tr>
</tbody>
</table>

**Cause:** The Republic did not effectively monitor and document actual in-kind contributions throughout the fiscal year.

**Effect:** The Republic is in noncompliance with applicable matching requirements, and questioned costs of $174,130 result.

**Recommendation:** Republic management should establish procedures to document and monitor actual in-kind contributions to meet the estimated matching provided to the grantor during the grant application process. For in-kind salaries by hospital staff, abstracts can be prepared monthly and certified by the applicable supervisor and program coordinator, which identify the approximate time spent by staff on program-related services for that month. For program-related meetings and training, minutes of such meetings and the amount of time spent on the meetings can be documented as support. Usage of in-kind space should be adequately documented to identify the actual usage during the year, prorate the estimated value for actual usage of space partially used during the year, to determine if the required match was met.

**Views of Auditee and Corrective Action Plan:**

The Republic describes corrective action plans in the auditee-prepared Corrective Action Plan.
Finding No.: 2018-004
Area: Financial Statements

Criteria: General ledger accounts should be reconciled in a timely manner.

Condition:

1. The Republic did not reconcile capital assets on a quarterly basis during the year ended September 30, 2018 as required by policy. A $26,766,040 adjustment was proposed to correct an overstatement of depreciation expense as of fiscal year end.

2. Operating transfers were not properly reconciled at September 30, 2018, which resulted in proposed adjustments to correct operating transfers for all governmental funds.

3. General Fund and Other Governmental Fund accounts receivable and related allowances were reconciled during the audit process resulting in $2,365,390 and $555,943 of proposed adjustments, respectively, to correct an understatement of accounts receivable.

Cause: The Republic appears to lack resources committed to periodically maintaining the Republic’s capital asset subsidiary records and reconciling other material general ledger accounts. There appears to be lack of management review of the financial statements to verify that balances and amounts in the financial statements are reconciled and are valid.

Effect: Material misstatements in the financial statements could exist undetected and uncorrected.

Identification as a Repeat Finding: 2017-011

Recommendation: The Republic should establish control procedures over the timely reconciliation of general ledger accounts. Management may wish to consider training in account reconciliation processes.

Auditee Response and Corrective Action Plan:

The Republic describes corrective action plans in the auditee-prepared Corrective Action Plan.
Finding No.: 2018-005
Area: Local Noncompliance – Procurement Regulations

Criteria: In accordance with applicable procurement regulations, procurement transactions shall provide for full and open competition that is best suited to the circumstances. Further, the ROP Property Management Policies and Procedures Manual, Procurement and Safeguard sections 625 and 626 state the following:

§625 - Procurement requirements shall not be artificially divided so as to constitute a small purchase.
§626 -

(b) Award shall be made to the responsible offeror whose proposal is determined in writing to be most advantageous to the Republic taking into consideration price and other evaluation factors set forth in the request for proposals. No other factors or criteria shall be used in the evaluation, and the contract file shall contain a detailed description of the findings and the basis on which the award is made.

Section 332 of Title 40 states that when the Minister of Health certifies an unavoidable emergency, the use of funds shall be exempt from the requirements of 40 PNC Chapter 6.

Condition: Of $5,305,785 in Other Fund non-payroll expenditures, fifty-five (55) samples totaling $2,100,903 were tested with the following deficiencies:

1. Sixteen (or 29%) aggregating $406,956 represent medical drugs and supply purchases pursuant to Invitation for Bid (IFB) 18-17. Our examination of related bid documents noted the following:
   a. The contract file did not contain a detailed description of the findings and the basis on which seven of the nine offerors were awarded varying amounts.
   b. The contract file did not contain a detail specification of goods being procured.
   c. Some files in support of IFB 18-17 were located at the respective ministries and not at the procurement office as stipulated by the Procurement Law.

2. Eight (or 15%) aggregating $215,059 represent medical drugs and supply purchases pursuant to Request for Proposal (RFP) 16-15 which relate to prior years findings 2016-012 and 2017-012, which has not been corrected. A contract award was provided to all who submitted bids regardless of the proposed cost.

3. A $5,435 expenditure represents medical and lab services that did not go through the procurement process (check no. 70001246). Further examination noted that invoices of the same nature aggregated $30,720.

4. A $9,310 expenditure (check no. 437429) to repair and purchase parts for equipment at the Belau National Hospital was procured through quotations; however, such did not constitute a small purchase as the single repair cost aggregated $33,930. Although the procurement files included a certification from the Minister of Health, supporting quotations were dated two and four months prior to the approved purchase order and therefore, did not support the declaration of an unavoidable emergency.
Finding No.: 2018-005, Continued
Area: Local Noncompliance – Procurement Regulations

Cause: The Republic did not effectively enforce controls over documenting compliance with applicable procurement regulations.

Effect: The Republic is in potential noncompliance with applicable procurement regulations.

Identification as a Repeat Finding: 2017-012

Recommendation: The Republic should strengthen controls over procurement to maximize competition, while maintaining the best interest of the Republic. If exceptions are allowed by procurement regulations, they should be reviewed and approved, and the rationales should be documented in the procurement files.

Auditee Response and Corrective Action Plan:

The Republic describes corrective action plans in the auditee-prepared Corrective Action Plan.
Finding No.: 2018-006
Area: Net Pension Liability

Criteria: The Republic should assess contingent liabilities as to their potential impact on the financial statements.

Condition: The Republic of Palau Civil Service Pension Trust Fund’s actuarial valuation has determined that the Fund has a net pension liability of $259,395,005. The potential impact on the financial statements has not been addressed.

Cause: It appears the Republic of Palau may not have the available resources to determine the impact of the net pension liability and to effect a solution.

Effect: The Fund is potentially at risk of failure to provide future benefits and the Republic’s actuary has determined that cash flow may be impacted by the Fund’s net pension liability by 2022.

Identification as a Repeat Finding: 2017-013

Recommendation: The Republic should identify measures to address the net pension liability and the potential impact of this matter on the general fund.

Views of Auditee and Planned Corrective Actions:

The Republic describes corrective action plans in the auditee-prepared Corrective Action Plan.
The prior year Single Audit report on compliance with laws and regulations noted the following questioned costs and comments that were unresolved at September 30, 2018:

<table>
<thead>
<tr>
<th>Questioned Costs</th>
<th>Republic</th>
<th>Subrecipient</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Questioned costs of the Republic as previously reported:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fiscal year 2015 Single Audit</td>
<td>$217,480</td>
<td>-</td>
<td>$217,480</td>
</tr>
<tr>
<td>Fiscal year 2016 Single Audit</td>
<td>97,206</td>
<td>-</td>
<td>97,206</td>
</tr>
<tr>
<td>Fiscal year 2017 Single Audit</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>314,686</td>
<td>-</td>
<td>314,686</td>
</tr>
<tr>
<td>Questioned costs of fiscal year 2018 Single Audit</td>
<td>174,130</td>
<td>-</td>
<td>174,130</td>
</tr>
<tr>
<td>Unresolved questioned costs of the Republic at</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>September 30, 2018</td>
<td>$488,816</td>
<td>-</td>
<td>$488,816</td>
</tr>
<tr>
<td>Finding No.</td>
<td>Program Area</td>
<td>Brief Description</td>
<td>Status of Finding</td>
</tr>
<tr>
<td>------------</td>
<td>--------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>2017-001</td>
<td>20.106-Equipment and Real Property Management</td>
<td>Noncompliance with applicable equipment and real property management requirements.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2017-002</td>
<td>20.106-Allowable Costs/Costs Principle</td>
<td>Lack of compliance with grant requirements</td>
<td>Resolved</td>
</tr>
<tr>
<td>2017-003</td>
<td>93.224-Special tests &amp; Provision</td>
<td>Lack of updated policies and procedures governing sliding fee discounts.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2017-004</td>
<td>93.224-Equipment and Real Property Management</td>
<td>Noncompliance with applicable equipment and real property management requirements.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2017-005</td>
<td>93.243-Equipment and Real Property Management</td>
<td>Noncompliance with applicable equipment and real property management requirements.</td>
<td>Management working to resolve this finding.</td>
</tr>
<tr>
<td>2017-006</td>
<td>84.027- Equipment and Real Property Management</td>
<td>Noncompliance with applicable equipment and real property management requirements.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2017-007</td>
<td>84.256- Equipment and Real Property Management</td>
<td>Noncompliance with applicable equipment and real property management requirements.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2017-008</td>
<td>Local compliance-Import taxes</td>
<td>Completeness of import tax collections are not documented and monitored</td>
<td>Resolved</td>
</tr>
<tr>
<td>2017-009</td>
<td>Cash receipts</td>
<td>Procedures were not in place to determine the gaps in sequential orders of daily receipts.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2017-010</td>
<td>Non-Federal grants</td>
<td>Lack of adherence to established policies and procedures to reconcile property records.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2017-011</td>
<td>Financial Statements</td>
<td>Management working to resolve this issue.</td>
<td>Management working to resolve this issue.</td>
</tr>
<tr>
<td>2017-012</td>
<td>Local noncompliance-Procurement regulations</td>
<td>Weaknesses in controls over documenting compliance with applicable procurement regulations</td>
<td>Management working to resolve this issue.</td>
</tr>
<tr>
<td>2017-013</td>
<td>Net Pension Liability</td>
<td>Net pension liability would cause the fund’s fiduciary net position to become a deficit in 2019.</td>
<td>Management working to resolve this issue.</td>
</tr>
<tr>
<td>2016-001</td>
<td>15.875-Equipment and Real Property Management</td>
<td>Lack of adherence to established policies and procedures to reconcile property records.</td>
<td>Management working to resolve this finding.</td>
</tr>
<tr>
<td>Finding No.</td>
<td>Program Area</td>
<td>Brief Description</td>
<td>Status of Finding</td>
</tr>
<tr>
<td>------------</td>
<td>------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>2016-002</td>
<td>84.027- Equipment and real property management</td>
<td>Lack of adherence to established policies and procedures regarding compliance with applicable equipment and real property management requirements.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2016-003</td>
<td>84.256- Equipment and real property management</td>
<td>Lack of adherence to established policies and procedures regarding compliance with applicable equipment and real property management requirements.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2016-004</td>
<td>84.378- Equipment and real property management</td>
<td>Lack of adherence to established policies and procedures regarding compliance with applicable equipment and real property management requirements.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2016-007</td>
<td>93.224- Equipment and real property management</td>
<td>Lack of adherence to established policies and procedures regarding compliance with applicable equipment and real property management requirements.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2016-008</td>
<td>93.224- Program Income</td>
<td>Delayed action by the program to use the independent cost study report analysis to implement changes to the program income.</td>
<td>Resolved</td>
</tr>
<tr>
<td>2016-009</td>
<td>93.243- Procurement and Suspension and Debarment</td>
<td>Lack of adherence to established policies and procedures regarding compliance with procurement requirements</td>
<td>Management working to resolve this finding.</td>
</tr>
<tr>
<td>2016-010</td>
<td>93.283- Equipment and real property management</td>
<td>Lack of adherence to established policies and procedures regarding compliance with applicable equipment and real property management requirements.</td>
<td>Management working to resolve this finding.</td>
</tr>
<tr>
<td>2016-013</td>
<td>Net Pension Liability</td>
<td>The net pension liability could cause the Fund’s fiduciary net position to become negative in 2018.</td>
<td>Management working to resolve this finding.</td>
</tr>
<tr>
<td>2015-005</td>
<td>93.224- Program Income</td>
<td>Potential noncompliance with program income requirements.</td>
<td>Resolved</td>
</tr>
</tbody>
</table>
Summary Schedule of Prior Audit Findings, Continued  
Year Ended September 30, 2018

<table>
<thead>
<tr>
<th>Finding No.</th>
<th>Program Area</th>
<th>Brief Description</th>
<th>Status of Finding</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015-007</td>
<td>93.116,93.224,93.143,93.283-Equipment and Real Property Management</td>
<td>Unlocated assets, not operable but were still in the property records; reconciliation not performed</td>
<td>Management working to resolve this finding.</td>
<td>On February 2018, Ministry of Finance contracted a consultant to finalize the real and personal property management, help reconcile physical inventory to capital assets records, help clear the federal award findings involving equipment and real property management, etc.</td>
</tr>
</tbody>
</table>
## CORRECTIVE ACTION PLAN

**2 CFR § 200.511(c)**  
**Year Ended September 30, 2018**

<table>
<thead>
<tr>
<th>FINDING NO.</th>
<th>CORRECTIVE ACTION PLAN</th>
<th>PROPOSED COMPLETION DATE</th>
<th>NAME AND CONTACT OF RESPONSIBLE PERSON</th>
</tr>
</thead>
</table>
| 2018-001    | CFDA #93.243:  
  Item 1: ROP concurs with reservation. Reconciliation was done between the program and P&S; however, the variance existed because the program didn’t update their listing when reconciliation was completed.  
  Item 2: ROP concurs with the finding. We have implement procedures to ensure that equipment that are procured are tagged and recorded on the fixed asset register and are reconciled periodically.  
  Item 3: Program ICT unit performs routine and daily checks and maintenance to ensure that systems running on these equipment are not compromised. In addition, ICT has a list of all assets being assigned to it including the said equipment and their location. Maintenance are done on a daily basis to ensure that it continues to be operable and in good condition. However, we will do a maintenance checklist as supporting that we maintain them and also procedures to follow in order to keep IT equipment maintained and safeguarded.  
  CFDA#15.875 ROP concurs with the finding. We have implement procedures to ensure that equipment that are procured are tagged and recorded on the fixed asset register and are reconciled periodically.  
  CFDA#93.898 Item 1a, 1b, & 1c: ROP concurs with these findings. DP&S will work with responsible department to ensure that if equipment is no longer operable, they will survey them and update their fixed asset listing. | December 2019 | Sterlina Gabriel  
  Director  
  Bureau of Lands and Survey  
  Contacts:  
  Email:  
  EverlynnTemengil  
  Chief  
  Bureau of Public Health  
  Ministry of Health  
  Contact: 680-488-2552  
  Email: temengilej@gmail.com  
  EdolemIkerdeu  
  Acting Executive Director  
  CHC-MOH  
  Bureau of Public Health  
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  Contacts: 680-488-4805  
  Email: edolem.ikerdeu@palauhealth.org  
  Millan Isack  
  Chief  
  Division of Procurement and Supply  
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  Contact: 680-488-2215  
  Email: misack@gmail.com |
| 2018-002    | ROP concurs with reservation. The Palau Community Health Program does not have a separate receipts system, but instead utilizes Ministry of Health’s as co-applicants. As such, all revenues collected by Ministry of Health, including the health centers, are submitted to the billing and collection department/finance office at the Ministry of Health, where they are prepared and deposited into the Hospital Trust Fund. All health center revenues are identified and tracked accordingly.  
  The Palau Community Health Center will work with the Ministry of Health’s finance/collection and billing department and Ministry of Finance to document this process clearly, document this process, provide training and institutionalize. | December 2019 | EdolemIkerdeu  
  Acting Executive Director  
  CHC-MOH  
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  Ministry of Health  
  Contacts: 680-488-4805  
  Email: edolem.ikerdeu@palauhealth.org |
**CORRECTIVE ACTION PLAN, CONTINUED**

2 CFR § 200.511(c)

Year Ended September 30, 2018

<table>
<thead>
<tr>
<th>2018-003</th>
<th>1. Auditee concurs on this finding. <strong>SALARY:</strong> Per recommendation, grantee will adopt or develop templates to keep track of time and tasks allocated to NCD related activities, including cancer.</th>
</tr>
</thead>
</table>
| April 2019 | Edolem Ikerdeu  
Acting Executive Director  
CHC-MOH  
Bureau of Public Health  
Ministry of Health  
Contacts: 680-488-4805  
Email: edolem.ikerdeu@palauhealth.org |
| 2. Auditee do not concur on this finding. **SPACE:** In the above recommendation, it states "In-kind space should be adequately documented to identify the actual usage during the year". Attached are details regarding usage (partial or whole) of spaces by the program. Grantee will recalculate based on usage and resubmit to grantor. |
| 2018-004 | ROP concurs with finding. MOF continues to train and hire capable staff to manage reconciliation on a quarterly basis. |
| Implemented | Millan Isack  
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Bureau of National Treasury  
Ministry of Finance  
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| Caryn Koshiba  
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Division of Finance and Accounting  
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Ministry of Finance  
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| | Masato Ushibata  
System Accountant  
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| | Gail Rengiil  
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| 2018-005 | ROP concurs with the finding. Item1: MOH committee did submit their evaluation and recommendation but not the detailed matrix, P&S will ensure that all the required documents be filed together in one file. |
| | Item 2: We concur with the finding. MOF will work closely with MOH on resolving this issue. |
| | Item 3: We concur with the finding. MOF will work closely with MOH on resolving this issue. |
| | Millan Isack  
Chief  
Division of Procurement and Supply  
Bureau of National Treasury  
Ministry of Finance  
Contact: 680-488-2215  
Email: misack@gmail.com |
| | Gail Rengiil  
Director  
Bureau of National Treasury  
Ministry of Finance  
Contacts: 680-488-2566  
Email: gailr@palaugov.org |
<table>
<thead>
<tr>
<th>Item 4</th>
<th>MOF management are aware of this and are working with the policy makers to find the best solution to resolve the issue.</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018-006</td>
<td>December 2019</td>
</tr>
</tbody>
</table>
|        | Elbuchel Sadang  
|        | Ministry of Finance  
|        | PH: 680-488-2580  
|        | Email: esadang@qmail.com  
|        | Casmir Remengesau,  
|        | Director  
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|        | Ministry of Finance  
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|        | Gail Rengiil  
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|        | Bureau of National Treasury  
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