Management Letter

St. Peter Fire Relief Association

St. Peter, Minnesota

For the Year Ended
December 31, 2019

ABDO EICK & MEYERS LLP
Certified Public Accountants & Consultants

People + Process. Going Beyond the Numbers

ABDO EICK & MEYERS LLP
Certified Public Accountants & Consultants

February 4, 2020

Board of Trustees
St. Peter Fire Relief Association
St. Peter, Minnesota

We have audited the financial statements of the governmental activities, each major fund and the aggregate remaining fund information of the St. Peter Fire Relief Association (the Association) for the year ended December 31, 2019, and have issued our report thereon dated February 4, 2020. Professional standards require that we provide you with the following information related to our audit.

Our Responsibility Under Auditing Standards Generally Accepted in the United States of America

As stated in our engagement letter, our responsibility, as described by professional standards, is to express opinions about whether the financial statements prepared by management with your oversight are fairly presented, in all material respects, in conformity with accounting principles generally accepted in the United States of America. Our audit of the financial statements does not relieve you or management of your responsibilities.

Our responsibility is to plan and perform the audit to obtain reasonable, but not absolute, assurance that the financial statements are free of material misstatement.

As part of our audit, we considered the internal control of the Association. Such considerations were solely for the purpose of determining our audit procedures and not to provide any assurance concerning such internal control.

Significant Audit Findings

In planning and performing our audit of the financial statements of the Association for the year ended December 31, 2019, in accordance with auditing standards generally accepted in the United States of America, we consider the Association's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Association's internal control. Accordingly, we do not express an opinion on the effectiveness of the Association's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses and therefore, there can be no assurance that all such deficiencies have been identified. However, as discussed below, we identified a deficiency in internal control that we consider to be a significant deficiency.

A deficiency in internal control exists when the design or operation of a control does not allow management, 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 combination of deficiencies, in internal control such that there is a reasonable possibility that material misstatement of the Association's financial statements will not be prevented, or detected and corrected on a timely basis. We did not identify any deficiencies in internal control that we consider to be material weaknesses.

A significant deficiency is a deficiency, or 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 finding 2019-1 to be a significant deficiency in internal control.

2019-1 Financial Report Preparation

Condition: As in prior years, we were requested to draft the audited financial statements and related footnote disclosures as part of our regular audit services. Auditing standards require auditors to communicate this situation to the Board as an internal control deficiency. Ultimately, it is management's responsibility to provide for the preparation of your statements and footnotes, and the responsibility of the auditor to determine the fairness of presentation of those statements. From a practical standpoint we do both for you at the same time in connection with our audit. This is not unusual for us to do with associations of your size. However, based on recent auditing standards, it is our responsibility to inform you that this deficiency could result in a material misstatement to the financial statements that could have been prevented or detected by your management. Essentially, the auditors cannot be part of your internal control process.

Criteria: Internal controls should be in place to provide reasonable assurance over financial reporting.

Cause: From a practical standpoint we do both for you at the same time in connection with our audit. This is not unusual for us to do with associations of your size.

Effect: The effectiveness of the internal control system relies on enforcement by management. The effect of deficiencies in internal controls can result in undetected errors in financial reporting.

Recommendation: It is your responsibility to make the ultimate decision to accept this degree of risk associated with this condition because of cost or other considerations. As in prior years, we have instructed management to review a draft of the auditor prepared financials in detail for their accuracy; we have answered any questions they might have, and have encouraged research of any accounting guidance in connection with the adequacy and appropriateness of classification of disclosure in your statements. We are satisfied that the appropriate steps have been taken to provide you with the completed financial statements. While the Association is reviewing the financial statements we recommend a disclosure checklist is utilized to ensure all required disclosures are presented and the Association should agree its financial software to the numbers reported in the financial statements.

Management Response:

For now, the Association's management accepts the degree of risk associated with this condition and thoroughly reviews a draft of the financial statements.

Compliance

As part of obtaining reasonable assurance about whether the financial statements are free of material misstatement, we performed tests of compliance with certain provisions of laws, regulations, contracts and grants. However, the objective of our tests was not to provide an opinion on compliance with such provisions. We noted no instances of noncompliance with Minnesota Statutes.

Planned Scope and Timing of the Audit

We performed the audit according to the planned scope and timing previously communicated to you through various means.

Qualitative Aspects of Accounting Practices

Management has the responsibility for selection and use of appropriate accounting policies. In accordance with the terms of our engagement letter, we will advise management about the appropriateness of accounting policies and their application. The significant accounting policies used by the fire relief are described in Note 2 to the financial statements. No new accounting policies were adopted and the application of existing policies was not changed during the year. We noted no transactions entered into by the Association during the year that were both significant and unusual, and of which, under professional standards, we are required to inform you, or transactions for which there is a lack of authoritative guidance or consensus.

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimate affecting the financial statements was the actuarial accrued liability. This is based on the funding formula prescribed by the State of Minnesota. We evaluated the key factors and assumptions used to develop the estimate in determining that it is reasonable in relation to the financial statements taken as a whole.

The disclosures in the financial statements are neutral, consistent, and clear. Certain financial statement disclosures are particularly sensitive because of their significance to financial statement users.

Difficulties Encountered in Performing the Audit

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

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are trivial, and communicate them to the appropriate level of management. There were no misstatements noted during the audit.

Management Representations

We have requested certain representations from management that are included in the management representation letter dated February 4, 2020.

Disagreements with Management

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

Management Consultations with Other Independent Accountants

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

Other Audit Findings or Issues

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

Other Matters

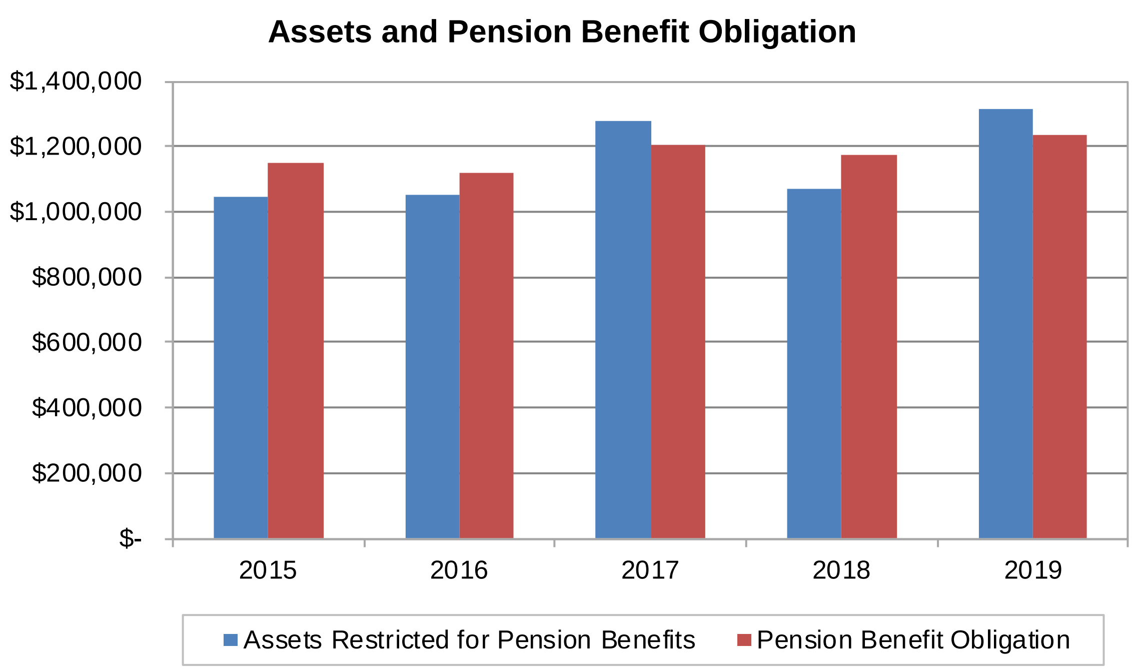
With respect to the supplementary information accompanying the financial statements, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with accounting principles generally accepted in the United States of America, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

Financial Position

Net Assets and Pension Benefit Obligation Comparison

A comparison of net position and pension benefit obligations for the past five years is as follows:

Year	Assets Restricted for Pension Benefits	Pension Benefit Obligation	Pension Percentage Funded	Funded (Unfunded) Pension Benefits Obligation
2015	$ 1,043,728	$ 1,152,063	90.6 %	$ (108,335)
2016	1,052,577	1,117,738	94.2	(65,161)
2017	1,279,060	1,206,105	106.0	72,955
2018	1,073,048	1,173,824	91.4	(100,776)
2019	1,314,906	1,234,991	106.5	79,915

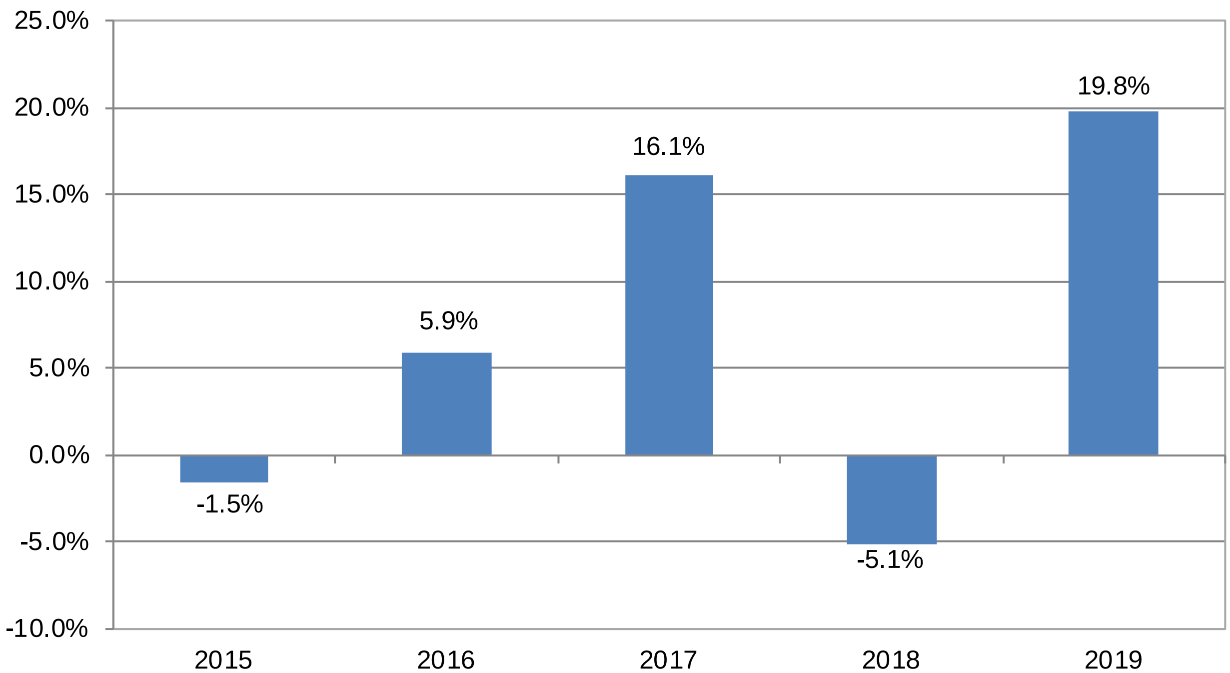


Rates of Return

The Association's investment rates of return are based on the total investment income (loss) as a percentage of the total assets held in trust for pension benefits.

Year	Interest and Dividends	Appreciation/ (Depreciation) of Investments	Investment Fees	Total Investment Income (Loss)	Assets Restricted for Pension Benefits	Investment Rate of Return
2015	$ 15,883	$ (28,558)	$ 2,650	$ (15,325)	$ 1,043,728	(1.5) %
2016	7,373	56,508	2,635	61,246	1,052,577	5.9
2017	20,783	151,675	2,947	169,511	1,279,060	16.1
2018	6,829	(68,805)	3,122	(65,098)	1,073,048	(5.1)
2019	7,749	207,641	3,049	212,341	1,314,906	19.8

Investment Rates of Return



Peer Group Comparisons

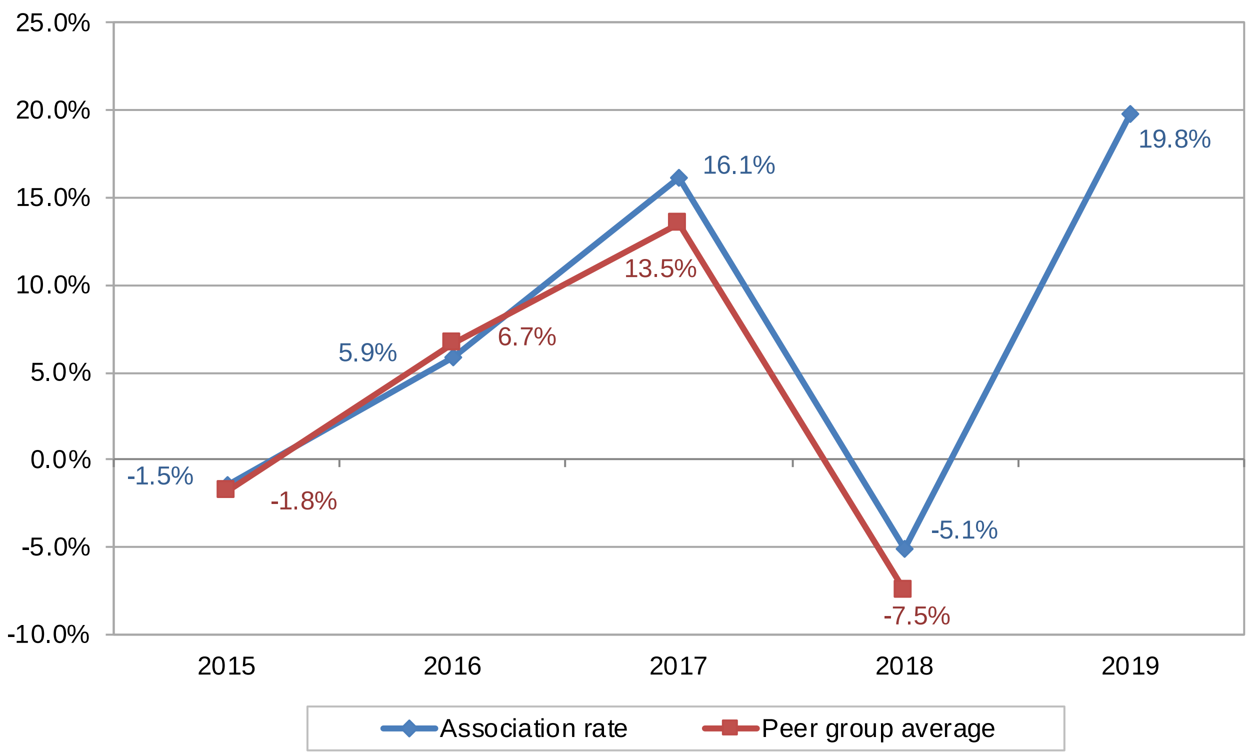
The following are two comparisons of statistics that will provide information on how the Association compares with other fire relief associations around the state. We used averages from approximately 60 fire relief associations that we work with that have under $200,000 in assets to several million in assets. These averages include a 5 year trend of the rate of return and a 5 year trend of funding percentage as compared to averages of the other 60 relief associations.

Averages	Calculation	2015	2016	2017	2018	2019
Average Rate of Returns	Net Investment Income/Beginning Assets	-1.5%	5.9%	16.1%	-5.1%	19.8%
		-1.8%	*6.7%*	*13.5%*	*-7.5%*	*N/A*
Percentage Funded	Assets/Accrued Liability	90.6%	94.2%	106.0%	91.4%	106.5%
		108.7%	*111.6%*	*123.1%*	*110.8%*	*N/A*

St. Peter Fire Relief Association
Peer Group

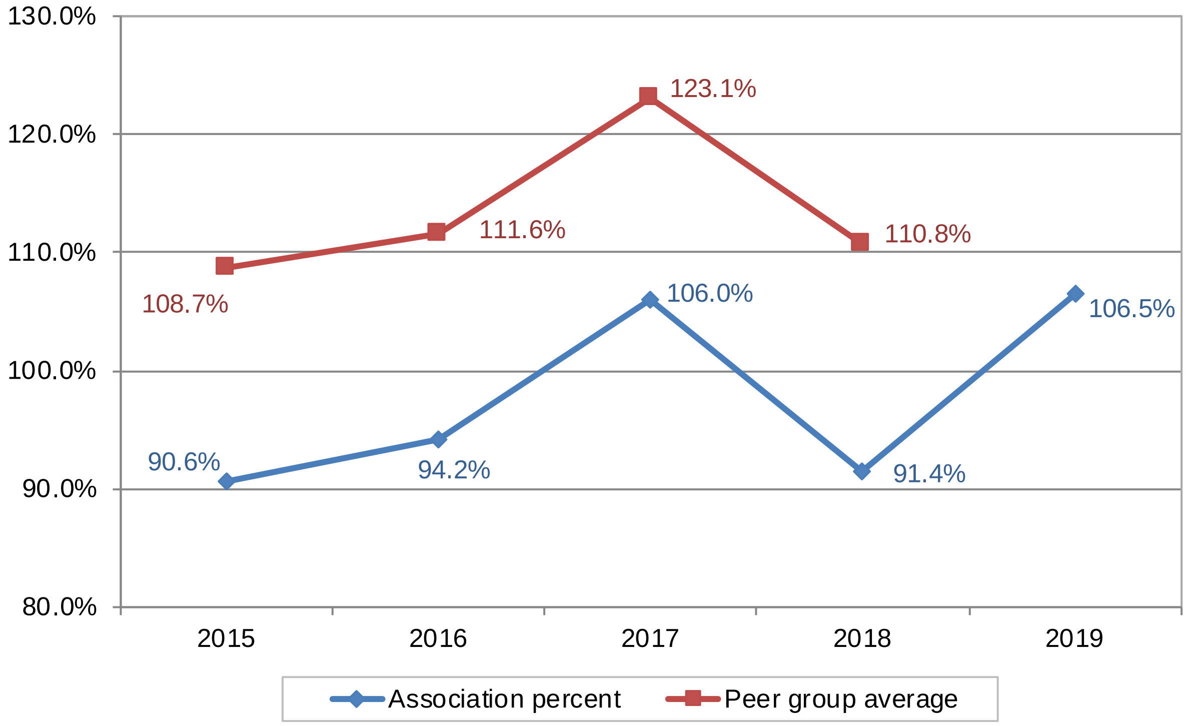
Rates of Return

The rate of return is calculated by taking the net investment income and dividing it by the beginning assets. This will show a trend of your returns over a 5 year period and show your performance related to other relief associations that we work with.



Funding Percentage

The funding percentage is calculated by taking the Special fund assets and dividing it by the accrued pension liability. This graph will show your funding percentage for a 5 year period and compare your percentage to other relief associations.



Best Practices in Monitoring Investment Results

The Board has a fiduciary responsibility to its membership related to its assets. In order to communicate relevant information to membership, we recommend the following:

- **Investment performance should be benchmarked and reviewed with membership**
    - We believe this can easily be addressed by more frequent reporting that uses complete financial information and appropriate investment benchmarks. With better information, more timely and prudent investment decisions can be made. We have provided a table for analysis in this letter. We recommend that the Board consider other performance measures and develop a strategy to report on them.

- **Investment policy should be reviewed annually**
    - We recommend that the Association review their investment policy. Policies should:
        1. Contain enough detail to implement a specific investment strategy
        2. Outline the duties and responsibilities of all parties
        3. Set forth portfolio diversification, rebalancing and risk guidelines
        4. Incorporate specific, measurable investment objectives or benchmarks

We can assist with the implementation of either of these items.

* * * * * * *

This report is intended solely for the information and use of the Board of Trustees, management, others within the administration of the Association and the Minnesota Office of the State Auditor and is not intended to be and should not be used by anyone other than those specified parties.

The comments and recommendation in this report are purely constructive in nature, and should be read in this context and is not intended to be and should not be used by anyone other than these specified parties. Our audit would not necessarily disclose all weaknesses in the system because it was based on selected tests of the accounting records and related data.

If you have any questions or wish to discuss any of the items contained in this letter, please feel free to contact us at your convenience. We wish to thank you for the continued opportunity to be of service, and for the courtesy and cooperation extended to us by your staff.

Abdo Eick & Meyers, LLP

ABDO, EICK & MEYERS, LLP
Mankato, Minnesota
February 4, 2020