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June 25, 2020

The Board of Trustees
Guam Memorial Hospital Authority

Dear Members of the Board of Trustees:

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We have performed an audit of the financial statements of the Guam Memorial Hospital Authority (the Authority) as of and for the year ended September 30, 2019, in accordance with auditing standards generally accepted in the United States of America ("generally accepted auditing standards") and have issued our report thereon dated June 25, 2020.

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

This report is intended solely for the information and use of the Board of Trustees, management, the Office of the Public Accountability of Guam and others within the organization and is not intended to be and should not be used by anyone other than these specified parties. However, this report is also a matter of public record.

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

Very truly yours,

cc: The Management of Guam Memorial Hospital Authority

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

Our responsibility under generally accepted auditing standards and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, has been described in our engagement letter dated September 13, 2019. As described in that letter, the objective of a financial statement audit conducted in accordance with the aforementioned standards is:

- To express an opinion on the fairness of the Authority's financial statements for the year ended September 30, 2019 (the "financial statements"), in accordance with accounting principles generally accepted in the United States of America ("generally accepted accounting principles") in all material respects, and to perform specified procedures on the required supplementary information for the year ended September 30, 2019;
- To express an opinion on whether the supplementary information that accompanies the financial statements, including the schedule of expenditures of federal awards, is fairly stated, in all material respects, in relation to the financial statements taken as a whole;
- To report on the Authority's internal control over financial reporting and on its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters for the year ended September 30, 2019, based on an audit of financial statements performed in accordance with standards applicable to financial audits contained in generally accepted government auditing standards; and
- To report on the Authority's compliance with requirements applicable to each major program and on internal control over compliance in accordance with the Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance).

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

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

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

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ACCOUNTING ESTIMATES

Accounting estimates are an integral part of the financial statements prepared with the oversight of management and are based on management's current judgments. Those judgments are normally based on knowledge and experience about past and current events and on assumptions about future events. Significant accounting estimates reflected in the Authority's 2019 financial statements include management's estimate of the allowance for uncollectible accounts, which is determined based on management's evaluation of the collectability of current accounts and historical trends, management's estimate of the provision for inventory obsolescence, which is determined based on management's evaluation of the inventory's realizable value, and management's estimate of depreciation expense, which is based on estimated useful lives of the respective capital assets. During the year ended September 30, 2019, we are not aware of any significant changes in accounting estimates or in management's judgments relating to such estimates.

AUDIT ADJUSTMENTS AND UNCORRECTED MISSTATEMENTS

Our audit of the financial statements was designed to obtain reasonable, rather than absolute, assurance about whether the financial statements are free of material misstatement, whether caused by error or fraud. As the result of our audit work, we identified matters that resulted in audit adjustments that we believe, either individually or in the aggregate, would have a significant effect on the Authority's financial reporting process. Such proposed adjustments, listed as Appendix A to Attachment I, have been recorded in the accounting records and are reflected in the 2019 financial statements.

In addition, listed in Appendix B and Appendix C to Attachment I, are summaries of uncorrected misstatements and disclosures aggregated by us during the current engagement and pertaining to the latest period presented that were determined by management to be immaterial, both individually and in the aggregate, to the financial statements taken as a whole.

SIGNIFICANT ACCOUNTING POLICIES

The Authority's significant accounting policies are set forth in Note 2 to the Authority's 2019 financial statements. During the year ended September 30, 2019, there were no significant changes in previously adopted accounting policies or their application, except for the following pronouncements adopted by the Authority:

- GASB Statement No. 83, Certain Asset Retirement Obligations, which addresses accounting and financial reporting for certain asset retirement obligations (AROs) associated with the retirement of a tangible capital asset.
- GASB Statement No. 88, Certain Disclosures Related to Debt, including Direct Borrowings and Direct Placements, which improves the information that is disclosed in notes to government financial statements related to debt, including direct borrowings and direct placements.

The implementation of these statements did not have a material effect on GMHA's financial statements.

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

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

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SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

In June 2018, GASB issued Statement No. 89, Accounting for Interest Cost Incurred before the End of a Construction Period, which requires that interest cost incurred before the end of a construction period be recognized as an expense in the period in which the cost is incurred for financial statements prepared using the economic resources measurement focus. The provisions in Statement No. 89 are effective for fiscal years beginning after December 15, 2019. Management does not believe that the implementation of this statement will have a material effect on the financial statements.

In August 2018, GASB issued Statement No. 90, Majority Equity Interests - an Amendment of GASB Statements No. 14 and No. 61, which improves the consistency and comparability of reporting a government's majority equity interest in a legally separate organization and the relevance of financial statement information for certain component units. The provisions in Statement No. 90 are effective for fiscal years beginning after December 15, 2018. Management does not believe that the implementation of this statement will have a material effect on the financial statements.

In May 2019, GASB issued Statement No. 91, *Conduit Debt Obligations*, which clarifies the existing definition of a conduit debt obligation; establishing that a conduit debt obligation is not a liability of the issuer; establishing standards for accounting and financial reporting of additional commitments and voluntary commitments extended by issuers and arrangements associated with conduit debt obligations; and improving required note disclosures. The provisions in Statement No. 91 are effective for fiscal years beginning after December 15, 2020. Management does not believe that the implementation of this statement will have a material effect on the financial statements.

In May 2020, GASB issued Statement No. 95, *Postponement of the Effective Dates of Certain Authoritative Guidance*, which postpones the effective dates of GASB Statement No. 84, 89, 90 and 91 by one year and GASB Statement No. 87 by 18 months; however, earlier application of the provisions addressed in GASB Statement No. 95 is encouraged and is permitted to the extent specified in each pronouncement as originally issued. Management has yet to ascertain whether implementation of these statements will be postponed as provided in GASB Statement No. 95.

OTHER INFORMATION IN THE ANNUAL REPORTS OF THE AUTHORITY

When audited financial statements are included in documents containing other information, such as Annual Reports, we will read such other information and consider whether it, or the manner of its presentation, is materially inconsistent with the information, or the manner of its presentation, in the financial statements audited by us. In the event that the Authority issues an Annual Report or other documentation that includes the audited financial statements, we will be required to read the other information in the Authority's 2019 Annual Report and will inquire as to the methods of measurement and presentation of such information. If we note a material inconsistency or if we obtain any knowledge of a material misstatement of fact in the other information, we will discuss this matter with management and, if appropriate, with the Board of Trustees.

DISAGREEMENTS WITH MANAGEMENT

We have not had any disagreements with management related to matters that are material to the Authority's 2019 financial statements.

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

We are not aware of any consultations that management may have had with other accountants about auditing and accounting matters during 2019.



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

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

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

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

MANAGEMENT'S REPRESENTATIONS

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

SIGNIFICANT DIFFICULTIES ENCOUNTERED IN PERFORMING THE AUDIT

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

CONTROL-RELATED MATTERS

We have issued a separate report to you, dated June 25, 2020, on the Authority's internal control over financial reporting and on its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters, which was based upon the audit performed in accordance with *Government Auditing Standards*. Within that report, we noted certain matters that were considered to be material weaknesses under standards established by the American Institute of Certified Public Accountants.

We have communicated to management, in separate letters also dated June 25, 2020, certain deficiencies and other matters related to the Authority's internal control over financial reporting and to the Authority's internal control over its information technology environment that we identified during our audit.

Although we have included management's written responses to our comments, such responses have not been subjected to the auditing procedures applied in our audit of the basic financial statements and, accordingly, we do not express an opinion or provide any form of assurance on the appropriateness of the responses or the effectiveness of any corrective actions described therein.



Guam Memorial Hospital Authority

Aturidåt Espetåt Mimuriåt Guåhan

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June 25, 2020

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

We are providing this letter in connection with your audits of the financial statements of the Guam Memorial Hospital Authority (GMHA), a component unit of the Government of Guam (GovGuam), as of September 30, 2019 and 2018, and the related statements of revenues, expenses and changes in net position and of cash flows for the years then ended, and the related notes to the financial statements, which collectively comprise GMHA's basic financial statements for the purpose of expressing an opinion as to whether the basic financial statements present fairly, in all material respects, the financial position, results of operations and change in net position, and cash flows of GMHA in conformity with accounting principles generally accepted in the United States of America (GAAP).

We confirm that we are responsible for the following:

- a. The preparation and fair presentation in the basic financial statements of financial position, results of operations, and cash flows, in conformity with GAAP.
- b. The design, implementation, and maintenance of internal control:
 - Relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error
 - To prevent and detect fraud
- c. The review and approval of the financial statements and related notes and acknowledge your role in the preparation of this information. Specifically, we acknowledge that your role in the preparation of the financial statements was a matter of convenience rather than one of necessity. We have reviewed the financial statement preparation assistance provided by you and acknowledge that the financial statements are prepared in accordance with GAAP. Our review was based on the use of the financial statement disclosure checklist for a stand-alone business-type activities governments obtained from the Government Finance Officers Association. Additionally, we agree to the recorded adjustments included in Appendix A.

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

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

- 1. The basic financial statements referred to above are fairly presented in conformity with GAAP. In addition:
 - a. Net position components (net investment in capital assets; restricted; and unrestricted) are properly classified and, if applicable, approved.
 - b. Deposits are properly classified in the category of custodial credit risk.
 - c. Capital assets are properly capitalized, reported, and, if applicable, depreciated.
 - d. Required supplementary information is measured and presented within prescribed guidelines.
 - e. Other supplementary information is measured and presented within prescribed guidelines.
 - f. Applicable laws and regulations are followed in adopting, approving, and amending budgets.
 - g. Revenues and expenses are appropriately classified in the statements of revenues, expenses and changes in net position within operating revenues, non-operating revenues and expenses.
- 2. GMHA has provided to you all relevant information and access as agreed in the terms of the audit engagement letter.
- 3. GMHA has made available to you:
 - a. All minutes of the meetings of the Board of Trustees or summaries of actions of recent meetings for which minutes have not yet been prepared. The following details the summary of minutes:

<u>Name</u>	<u>Date</u>	<u>Name</u>	<u>Date</u>
Regular Meeting	November 7, 2018	Regular Meeting	August 21, 2019
Regular Meeting	December 27, 2018	Regular Meeting	September 25, 2019
Regular Meeting	May 16, 2019	Regular Meeting	November 6, 2019
Regular Meeting	June 26, 2019	Regular Meeting	December 11, 2019
Regular Meeting	July 24, 2019		

- b. All financial records and related data for all financial transactions of GMHA and for all funds administered by GMHA. The records, books, and accounts, as provided to you, record the financial and fiscal operations of all funds administered by GMHA and provide the audit trail to be used in a review of accountability. Information presented in financial reports is supported by the books and records from which the financial statements have been prepared.
- c. Contracts and grant agreements (including amendments, if any) and any other correspondence that has taken place with federal agencies.
- d. Third-party payor reports and information.

4. There has been no:

- a. Action taken by GMHA management that contravenes the provisions of federal laws and Guam laws and regulations, or of contracts and grants applicable to GMHA except as discussed in the Schedule of Findings and Questioned Costs section of your Independent Auditors' Reports on Internal Control and on Compliance.
- b. Communication from regulatory agencies concerning noncompliance with laws and regulations (including those related to the Medicare and Medicaid antifraud and abuse statutes) or deficiencies in financial reporting practices or other matters that could have a material effect on the financial statements.
- 5. We believe the effects of any uncorrected financial statement misstatements aggregated by you during the current audit engagement and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the financial statements taken as a whole. A summary of such uncorrected misstatements has been attached as Appendix B.
- 6. We have completed our procedures to evaluate the accuracy and completeness of the disclosures in our financial statements. As a result of the evaluation process, we identified certain disclosures that, although required GAAP, have been omitted from our financial statements. Those omitted disclosures that are regarded as more than clearly trivial are attached as Appendix C. We believe the effects of the omitted disclosures are quantitatively and qualitatively immaterial, both individually and in the aggregate, to the financial statements as a whole.
- 7. GMHA has not performed a formal risk assessment, including the assessment of the risk that the financial statements may be materially misstated as a result of fraud. However, management has made available to you their understanding about the risks of fraud in GMHA and do not believe that the financial statements are materially misstated as a result of fraud.
- 8. We have no knowledge of any fraud or suspected fraud affecting GMHA involving:
 - a. Management.
 - b. Employees who have significant roles in internal control over financial reporting.
 - c. Others, where the fraud could have a material effect on the financial statements.
- We have no knowledge of any allegations of fraud or suspected fraud affecting GMHA's financial statements communicated by employees, former employees, analysts, regulators, or others.
- 10. There are no unasserted claims or assessments that we are aware or that legal counsel has advised us are probable of assertion and must be disclosed in accordance with GASB Codification of Governmental Accounting and Financial Reporting Standards ("GASB Codification") Section C50, Claims and Judgments. Management is of the opinion, based on discussions with applicable legal counsel, that adequate provision has been made in the financial statements for unasserted claims or assessments and we do not believe that resolution of these matters will have material impact on the financial statements.
- 11. Significant assumptions used by us in making accounting estimates are reasonable.

- 12. We are responsible for the preparation of the Schedule of Expenditures of Federal Awards in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* ("OMB Uniform Guidance"). We have identified and disclosed all of GMHA's government programs and related activities subject to the OMB Uniform Guidance compliance audit. In addition, we have accurately completed the appropriate sections of the data collection form.
- 13. We are responsible for compliance with local, state, and federal laws, rules, and regulations, including compliance with the requirements of OMB Uniform Guidance, and provisions of grants and contracts relating to GMHA's operations. We are responsible for establishing and maintaining the components of internal control relating to our activities in order to achieve the objectives of providing reliable financial reports, effective and efficient operations, and compliance with laws and regulations. GMHA is responsible for maintaining accounting and administrative control over revenues, obligations, expenditures, assets, and liabilities.
- 14. We are responsible for establishing and maintaining, and have established and maintained, effective internal control over compliance for federal programs that provides reasonable assurance that we are managing federal awards in compliance with federal statutes, regulations, and the terms and conditions of the federal awards that could have a material effect on its federal programs.
- 15. We have disclosed to you all deficiencies in the design or operation of internal control over financial reporting identified as part of our evaluation, including separately disclosing to you all such deficiencies that are significant deficiencies or material weaknesses in internal control over financial reporting.
- 16. No events have occurred subsequent to September 30, 2019 that require consideration as adjustments to or disclosures in the schedule of federal awards and related notes or that existed at the end of the reporting period that affect noncompliance during the reporting period.
- 17. We have disclosed all known noncompliance with direct and material compliance requirements occurring subsequent to September 30, 2019.
- 18. There have been no changes in internal control over compliance or other factors that might significantly affect internal control, including any corrective action taken by the Authority with regard to significant deficiencies and material weaknesses in internal control over compliance, subsequent to September 30, 2019.
- 19. Federal awards expenditures have been charged in accordance with applicable cost principles.
- 20. GMHA has obligated, expended, received, and used public funds in accordance with the purpose for which such funds have been appropriated or otherwise authorized by local, state, or federal law. Such obligation, expenditure, receipt, or use of public funds was in accordance with any limitations, conditions, or mandatory directions imposed by local, state, or federal law.
- 21. Money or similar assets handled by GMHA on behalf of the Federal Government have been properly and legally administered, and the accounting and record keeping related thereto is proper, accurate, and in accordance with law.

22. We have disclosed to you all communications from service organizations relating to noncompliance with the requirements of federal statutes, regulations, and terms and conditions of federal awards at those organizations.

23. We have:

- a. Identified and disclosed to you the requirements of federal statutes, regulations, and the terms and conditions of federal awards that are considered to have a direct and material effect on each major program under audit.
- b. Complied, in all material respects, with the direct and material compliance requirements identified above in connection with federal awards except as disclosed in the Schedule of Findings and Questioned Costs.
- c. Identified and disclosed interpretations of any compliance requirements that have varying interpretations.
- d. Made available all federal awards (including amendments, if any) and any other correspondence relevant to federal programs and related activities that have taken place with federal agencies or pass-through entities. Management has made available all documentation related to compliance with the direct and material compliance requirements, including information related to federal program financial reports and claims for advances and reimbursements. Federal financial reports and claims for advances and reimbursements are supported by the books and records from which the financial statements have been prepared and are prepared on a basis consistent with that presented in the Schedule of Expenditures of Federal Awards. The copies of federal program financial reports provided are true copies of the reports submitted, or electronically transmitted, to the federal agency or pass-through Entity, as applicable.
- e. Identified and disclosed all amounts questioned and all known noncompliance with the direct and material compliance requirements of federal awards, including the results of other audits, program reviews, or any communications from federal awarding agencies and pass-through entities concerning possible noncompliance related to the objectives of the audit.
- f. Identified previous financial audits, attestation engagements, performance audits, or other studies related to the objectives of the audit and the corrective actions taken to address significant findings and recommendations, including the status of follow-up on prior audit findings (and information about all management decisions) by federal awarding agencies and pass-through entities.
- g. Provided to you our views on the reported findings, conclusions, and recommendations for your report.
- 24. We are responsible for follow-up on all prior-year findings. We have prepared a summary schedule of prior-year findings by federal awarding agency and pass-through entity, including all management decisions, to report the status of our efforts in implementation of the prior-year's corrective action plan. The summary schedule of prior audit findings includes all findings required to be included in accordance with OMB Uniform Guidance.

- 25. We are responsible for taking corrective action on audit findings and have developed a corrective action plan that meets the requirements of OMB Uniform Guidance. We have included in the corrective action plan for current-year findings, the name of the person in our organization responsible for implementation of the actions, the best actions to be taken, and the estimate of a completion date. We have taken timely and appropriate steps to remedy fraud, illegal acts, violations of provisions of contracts or grant agreements, or abuse that you report.
- 26. Management has identified and disclosed to you all laws and regulations that have a direct and material effect on the determination of financial statement amounts.
- 27. No organizations were identified that meet the criteria established in GASB Codification Section 2100, *Defining the Financial Reporting Entity*.

Except where otherwise stated below, matters less than \$752,000 collectively are not considered to be exceptions that require disclosure for the purpose of the following representations. This amount is not necessarily indicative of amounts that would require adjustment to, or disclosure in, the basic financial statements.

- 28. Except as listed in Appendices B and C, there are no transactions that have not been properly recorded in the accounting records underlying the financial statements.
- 29. GMHA has no plans or intentions that may affect the carrying value or classification of assets and liabilities.
- 30. Regarding related parties:
 - a. We have disclosed to you the identity of GMHA's related parties and all the related party relationships and transactions of which we are aware.
 - b. To the extent applicable, related parties and all the related-party relationships and transactions, including sales, purchases, loans, transfers, leasing arrangements, and guarantees (written or oral) have been appropriately identified, properly accounted for, and disclosed in the financial statements.
- 31. In preparing the financial statements in conformity with GAAP, management uses estimates. All estimates have been disclosed in the financial statements for which known information available prior to the issuance of the financial statements indicates that both of the following criteria are met:
 - a. It is at least reasonably possible that the estimate of the effect on the financial statements of a condition, situation, or set of circumstances that existed at the date of the financial statements will change in the near term due to one or more future confirming events.
 - b. The effect of the change would be material to the financial statements.
- 32. Risks associated with concentrations, based on information known to management, that meet all of the following criteria have been disclosed in the financial statements:
 - a. The concentration exists at the date of the financial statements.
 - b. The concentration makes the enterprise vulnerable to the risk of a near-term severe impact.
 - c. It is at least reasonably possible that the events that could cause the severe impact will occur in the near term.

33. There are no:

- a. Instances of identified or suspected noncompliance with laws and regulations whose effects should be considered when preparing the financial statements, such as those related to the Medicare and Medicaid antifraud and abuse statutes, including but not limited to the Anti-Kickback Act, Limitation on Certain Physician Referrals (commonly referred to as the "Stark Law", and the False Claims Act), in any jurisdiction, whose effects should be considered for disclosure in the financial statements or as a basis for recording a loss contingency.
- b. Known actual or possible litigation and claims whose effects should be considered when preparing the financial statements that have not been disclosed to you and accounted for and disclosed in accordance with GAAP.
- c. Other liabilities or gain or loss contingencies that are required to be accrued or disclosed by GASB Codification Section C50, *Claims and Judgments*, except as disclosed in Note 15 to the financial statements.
- 34. GMHA has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral.
- 35. GMHA has complied with all aspects of contractual agreements that may have an effect on the financial statements except for instances of noncompliance included in the Schedule of Findings and Questioned Costs.
- 36. No department or agency of GMHA has reported a material instance of noncompliance to us except for instances of noncompliance included in the Schedule of Findings and Questioned Costs.
- 37. Regarding required supplementary information:
 - a. We confirm that we are responsible for the required supplementary information.
 - b. The required supplementary information is measured and presented in accordance with the requirements of the Governmental Accounting Standards Board.
 - c. The methods of measurement and presentation of the supplementary information have not changed from those used in the prior period.
- 38. Regarding supplementary information:
 - a. We are responsible for the fair presentation of the supplementary information in accordance with GAAP.
 - b. We believe the supplementary information, including its form and content, is fairly presented in accordance with GAAP.
 - c. The method of measurement and presentation of the supplementary information has not changed from those used in the prior period.
- 39. During fiscal year 2019, GMHA implemented the following pronouncements:
 - GASB Statement No. 83, Certain Asset Retirement Obligations, which addresses accounting and financial reporting for certain asset retirement obligations (AROs) associated with the retirement of a tangible capital asset.

• GASB Statement No. 88, Certain Disclosures Related to Debt, including Direct Borrowings and Direct Placements, which improves the information that is disclosed in notes to government financial statements related to debt, including direct borrowings and direct placements.

The implementation of these statements did not have a material effect on GMHA's financial statements.

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

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In May 2020, GASB issued Statement No. 95, *Postponement of the Effective Dates of Certain Authoritative Guidance*, which postpones the effective dates of GASB Statement No. 84, 89, 90 and 91 by one year and GASB Statement No. 87 by 18 months; however, earlier application of the provisions addressed in GASB Statement No. 95 is encouraged and is permitted to the extent specified in each pronouncement as originally issued. Management has yet to ascertain whether implementation of these statements will be postponed as provided in GASB Statement No. 95.

- 40. Arrangements with financial institutions involving compensating balances or other arrangements involving restrictions on cash balances, line of credit, or similar arrangements have been properly disclosed in the financial statements.
- 41. Financial instruments with significant individual or group concentration credit risk have been appropriately identified, properly recorded, and disclosed in the financial statements.
- 42. GMHA has disclosed whether, subsequent to September 30, 2018, any changes in internal control or other factors that might significantly affect internal control, including any corrective action taken by management with regard to significant deficiencies and material weaknesses, have occurred.
- 43. No evidence of fraud, possible irregularities, or dishonesty in fiscal operations of programs administered by GMHA has been discovered.
- 44. In 1991, Public Law 21-59 was enacted to establish a bonus system for employees of GovGuam, autonomous and semi-autonomous agencies, public corporations and other public instrumentalities of GovGuam who earn a superior performances grade. The bonus is calculated at 3.5% of the employee's base salary beginning 1991. GMHA did not pay any bonuses pursuant to the law from 1991 through 2002. In 2003, GMHA adopted a merit system similar to the GovGuam merit system. GMHA has assessed the impact of the requirements of the law for fiscal years 1991 through 2019.
- 45. GMHA has incurred losses from operations of \$30,469,708 and \$33,309,206 and negative cash flows from operations of \$28,725,127 and \$18,952,770 for the years ended September 30, 2019 and 2018, respectively. GMHA recorded contractual adjustments and provisions for uncollectible accounts of \$79,778,205 and \$62,835,996 for the fiscal years ended September 30, 2019 and 2018, respectively. At September 30, 2019 and 2018, GMHA's liabilities for delinquent and unpaid taxes with the Department of Revenue and Taxation were \$5,324,074 and \$5,435,349, respectively, and unremitted retirement contributions to GovGuam Retirement Fund were \$746,692 and \$1,234,753, respectively. The interest and penalties are presented under 'other (expense) income, net' in the statements of revenues, expenses and changes in net position.

At September 30, 2019 and 2018, GMHA has gross receivables from the Government of Guam of \$6,410,853 and \$8,974,860, respectively, for appropriations and outpatient clinic services to DOC. Of the total balance at September 30, 2019 and 2018, \$2,497,993 and \$1,915,514, relates to reimbursable outpatient clinic services to DOC detainees and inmates, with an allowance for uncollectible accounts of \$1,719,042 and \$0, respectively. At September 30, 2019 and 2018, GMHA also has \$2,326,280 and \$2,101,610 respectively, of receivables from DOC for inpatient medical services and these are presented under 'patient accounts receivable, net' in the statements of net position.

As disclosed in Note 3, at September 30, 2019 and 2018, patient accounts receivable includes gross receivables from the Government of Guam for healthcare services of \$2,554,317 and \$2,215,403, respectively, from the Medicaid Assistance Program of \$18,767,907 and \$13,127,092, respectively, and from the Medically Indigent Program of \$7,190,342 and \$4,076,296, respectively.

For the years ended September 30, 2019 and 2018, GMHA billed and collected the following from the Government of Guam:

	2019		2018	
	<u>Billings</u>	Collections	<u>Billings</u>	Collections
Healthcare services Medicaid Assistance Program Medically Indigent Program	\$ 981,341 40,035,520 14,557,079	\$ 460,203 17,579,613 _3,875,780	\$ 798,506 32,776,001 11,206,810	\$ 266,493 16,955,999 6,853,159
	\$ <u>55.573.940</u>	\$ 21.915.596	\$ 44.781.317	\$ 24.075.651

GMHA management has taken the following actions and measures to address losses from operations and negative cash flows from operations:

- Established collaborative partnerships with the Office of the Attorney General for collection referrals and the Department of Revenue and Taxation for garnishments of tax refunds for self-pay accounts.
- In October 2019, GMHA began considering an evaluation of its Revenue Cycle Management (RCM) to address perennial cash flow issues. In February 2020, a request for proposals was issued to solicit the specialized RCM services. The work would involve assisting GMHA receive appropriate and expedient reimbursements from insurance/third-party payers, improve revenues, reduce claims/insurance denials, reduce bad debt expense and write-offs, modernize and streamline the RCM workflow, reduce accounts receivables, maximize collections, decrease operating losses, maintain federal and local regulatory compliance, and improve patient experience. A preliminary assessment found that GMHA's charge master is considerably incomplete resulting in undercharging for room, board, and services. Coding is severely short staffed and impacting billing and collections. The entire revenue cycle management needs organizational restructure.
- In October 2018, to reduce the level of uncompensated care, GMHA hired an Eligibility Specialist in collaboration with the Department of Public Health and Social Services, to assist the uninsured and underinsured apply for and obtain Medicaid or MIP coverage.
- A Business Office Manager was hired in October 2019 to manage the Patient Affairs department and ensure efficiency and accuracy in billing and collections.
- The Board approved Official Resolution No.15-19 raising the hospital fees by 5% effective April 1, 2015 and another 5% automatically every subsequent year.
- Continue pursuing additional Tax Equity and Fiscal Responsibility Act (TEFRA) adjustment requests for fiscal years 2014 through 2018.

Management believes that the continuation of the Hospital's operations is dependent upon the future payment of medical services underwritten by the Government of Guam, continued compensation by the Government of Guam for the cost of services provided under the Medicaid and Medically Indigent Program, the collection of long outstanding patient receivables, and/or improvements in operations.

46. Receivables recorded in the financial statements represent valid claims against debtors for sales or other charges arising on or before the balance-sheet date and have been appropriately reduced to their estimated net realizable value.

- 47. GMHA is responsible for determining and maintaining the adequacy of the allowance for accounts receivable, as well as estimates used to determine such amounts. Management believes that allowances are adequate to absorb currently estimated bad debts in the account balances.
- 48. The recorded valuation allowances for accounts receivable and settlements with third parties are necessary, appropriate, and properly supported. Provision has been made for estimated retroactive adjustments by third-party payors under reimbursement agreements.
- 49. Provision has been made to reduce excess or obsolete inventories to their estimated net realizable value. All inventories are the property of GMHA and do not include any items consigned to it or any items billed to customers.
- 50. GMHA, using its best estimates based on reasonable and supportable assumptions and projections, reviews long-lived assets for impairment. During the year ended September 30, 2019, GMHA recorded \$400,000 impairment loss for the Z-Wing portion of the Hospital, which was specifically determined to be unsafe for use.
- 51. We believe that all expenditures that have been deferred to future periods are recoverable.
- 52. We have disclosed to you all additions or changes to the existing pension plan.
- 53. We agree with the findings of the experts contracted by the Government of Guam Retirement Fund and the Government of Guam Department of Administration for the actuarial evaluations of the Government of Guam's retirement plan, postretirement liabilities and other post-employment benefits (OPEB). We did not give any instructions, nor cause any instructions to be given, to management's experts with respect to values or amounts derived in an attempt to bias his or her work, and we are not aware of any matters that have affected the independence or objectivity of management's experts.
- 54. We believe that the actuarial assumptions and methods used to measure pension and postretirement liabilities and costs for financial accounting purposes are appropriate in the circumstances. These amounts have been appropriately recognized and displayed as assets, liabilities, deferred inflows, deferred outflows, net position and changes in net position in the financial statements in accordance with GASB Statement No. 68, Accounting and Financial Reporting for Pensions, and GASB Statement No. 73, Accounting and Financial Reporting for Pensions and Related Assets That Are Not Within the Scope of GASB Statement 68, and Amendments to Certain Provisions of GASB Statements 67 and 68.
- 55. We believe that the actuarial assumptions and methods used to measure other postemployment benefit liabilities are appropriate in the circumstances. These amounts have been appropriately recognized and displayed as assets, liabilities, deferred inflows, deferred outflows, net position and changes in net position in the financial statements in accordance with GASB Statement No. 75, Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions, which replaces the requirements of Statements No. 45, Accounting and Financial Reporting by Employers for Postemployment Benefits Other Than Pensions, as amended, and No. 57, OPEB Measurements by Agent Employers and Agent Multiple-Employer Plans.

- 56. We have no intention of terminating our participation in the Government of Guam Retirement plans or taking any other action that could result in an effective termination or reportable event for any of the plans. We are not aware of any occurrences that could result in the termination of any of our pension plans to which we contribute.
- 57. All additions to GMHA's property accounts consist of replacements or additions that are properly capitalizable.
- 58. There were no items of physical property contained in the property accounts of GMHA that were either (a) abandoned or (b) out of service and not regarded as either (i) standby property or equipment or (ii) property held for use only temporarily out of service.
- 59. We do not plan to make frequent amendments to our pension or other postretirement benefit plans.
- 60. Accrual for losses from malpractice, workers compensation, and other types of selfinsured risk, including accruals for claims incurred but not reported have been properly recorded and disclosed in the financial statements.
- 61. We have estimated the potential impact of failure to timely update professional fees effective January 1, 2019. The total estimated gross patient revenues lost was approximately at \$136,000.
- 62. In November 2019, the US Army Corps of Engineers conducted a facility condition assessment of the hospital building. In its final report, the cost of immediate repairs was estimated at \$21 million to support the reaccreditation of the facility and eliminate hazards to life, health, and safety. These repairs consist of roof replacement, exterior building repairs, HVAC repairs, life safety repairs, and fire sprinkler repairs. The report recommended GMHA to construct a new multi-story hospital of equivalent size on a suitable site on the island, with an estimated cost of \$743 million, including \$21 million to support reaccreditation.
- 63. On March 11, 2020, the World Health Organization declared the disease resulting from a novel strain of coronavirus (COVID-19) a global pandemic and recommended containment and mitigation measures worldwide. On March 13, 2020, President Donald J. Trump declared a national emergency within the United States. In response to the national emergency declared by the U.S. President, on March 14, 2020, Governor Lourdes A. Leon Guerrero issued Executive Order 2020-03 declaring a state of emergency in response to COVID-19. Further, Executive Order 2020-04 ordered the closure of all non-essential Government of Guam offices, prohibited large gatherings, and restricted entry into Guam from countries with confirmed COVID-19 cases. As a result, schools and non-essential government agencies and businesses GMHA, being an essential component, has not closed but has implemented staggered staffing to address social distancing and restricted visitation, elective and outpatient services. As of report date, GMHA has received direct Coronavirus Aid, Relief, and Economic Securities Act (CARES Act) funding from the Department of Health and Human Services of \$7.70 million. While the disruption is currently expected to be temporary, there is uncertainty around the duration. Due to uncertainty, the accompanying financial statements do not reflect any adjustments which may ultimately arise from these matters.

- 64. On March 11, 2020, GMHA announced that insurance coverage under TakeCare Insurance Company, Inc. (TakeCare) is no longer accepted due to non-payment of past due accounts. Consequently, TakeCare subscribers presenting themselves for treatment at the hospital are billed as self-paying patients. As of September 30, 2019, GMHA has a receivable from TakeCare of \$10.11 million, net of an allowance for doubtful accounts of \$6.18 million.
- 65. On February 3, 2020, GMHA requested from the Department of Revenue and Taxation a waiver of interest and penalties of \$2.38 million arising from liabilities for delinquent and unpaid taxes of \$5.32 million at September 30, 2019. On June 9, 2020, the Department of Revenue and Taxation approved the waiver. Also, in June 2020, GMHA has paid the related delinquent and unpaid taxes in full.
- 66. Except for matters discussed in numbers 62 through 65 above and disclosed in Note 17 to the financial statements, no events have occurred after September 30, 2019, but before June 25, 2020, the date the financial statements were available to be issued that require consideration as adjustments to or disclosures in the financial statements.

Very truly yours,

Ms. Lillian Perez-Posadas Chief Executive Officer

Ms. Vukari Hechanova

Chief Financial Officer, Acting

APPENDIX A - POSTED ADJUSTMENTS AND FINANCIAL STATEMENTS RECLASSIFICATION ENTRIES

	Audit Adjustments and Reclassifications	5		
Journal Entries -CAJE				
CO-Dept-Acct	Name	Debit	Credit	
1.02920.00105	1 CAJE To adjust federal grants revenue BIOTERRORISM GRANT	109,493.05	100 100 05	
1.01023.00500 1.02920.00400 1.01023.00500	DUE FROM GOV GUAM COMPACT IMPACT FUND DUE FROM GOV GUAM	90,387.53	109,493.05 90,387.53	
		199,880.58	199,880.58	
1.02920.00101 1.02920.00103	2 CAJE To adjust allotment and inventory HEALTHY FUTURES FUNDS GOVGUAM SUBSIDY	805,427.00	805,427.00	
1.01082.00000 1.09000.00998	INV-PHARMACY IN MATERIALS -1330 INV ADJ PHARMACY	122,725.79	122,725.79	
1.05270.00000 1.01023.00500	EDUCATION REVENUE DUE FROM GOV GUAM	468.00 928,620.79	468.00 928,620.79	
1.08812.00000	3 CAJE To adjust sick leave accrual SICK LEAVE EXPENSE	116,653.00	116.652.00	
1.02032.00010	ACCRUED SICK LEAVE	116,653.00	116,653.00 116,653.00	
1.08813.00000 1.02920.00201	4 CAJE To adjust retiree healthcare costs RETIREE HEALTHCARE COSTS TRANSFERS FROM GOVGUAM RET HEALT	81,460.19 81,460.19	81,460.19	
	5 CAJE To record FY19 Medicare reimbursement	61,100.13	01,100.15	
1.01023.01000 1.01041.00000	A/R - MEDICARE/PALMETTO ALLOW FOR CONTRACTUAL ADJ-MEDICA	1,513,000.00	1,513,000.00 1,513,000.00	
1.01041.00000 1.05810.00010	6 CAJE To correct JE 09-27 ALLOW FOR CONTRACTUAL ADJ-MEDICA CONTRACTUAL ADJUSTMENTS-MEDICARE	1,513,000.00 1,513,000.00	1,513,000.00 1,513,000.00	
1.09000.00999 1.09000.00998 1.06010.02500 1.06010.04100 1.07630.02500 1.07420.03200 1.07420.03200 1.07450.04150 1.07500.04150 1.07500.04150 1.07630.02600 1.07630.04100 1.08210.04900 1.08400.04602 1.08460.04612 1.08460.04617 1.08480.06200 1.08650.02300 1.02021.00000	7 CAJE To record additional invoices INV ADJ MATERIALS (EXP) INV ADJ PHARMACY REGISTRY NURSES OTHER CHARGEABLE MEDICAL SUPPLIE REGISTRY NURSES INSTRUMENTS & OTHER MINOR MEDICA SUTURES & SURGICAL PACKS OTHER MEDICAL CARE MATERIALS & S OTHER CHARGEABLE MEDICAL SUPPLIE OTHER MEDICAL CARE MATERIALS & S DUES & SUBSCRIPTIONS OTHER CONTRACTED SERVICES OTHER CHARGEABLE MEDICAL SUPPLIE OTHER MINOR EQUIPMENT OTHER MINOR EQUIPMENT OTHER MEDICAL CARE MATERIALS & S OCEAN FREIGHT OTHER MEDICAL CARE MATERIALS & S OFFICE & ADMINISTRATIVE SUPPLIES PAINTING/CARPENTRY SUPPLIES ELECTRICAL SUPPLIES REPAIRS & MAINTENANCE LEGAL SERVICES-RECRUITMENT TRADE PAYABLES	183,943.14 69,821.11 11,441.25 212.40 9,206.25 14.20 11,150.06 1,308.72 13,528.00 101.75 1,148.00 23,119.65 333.44 441.00 929.23 5,749.32 243.90 48.50 340.00 25,000.00 1,869.28	2,128.18 2,128.18 357,821.02 359,949.20	
	8 CAJE To record additional invoices		,, ,	
1.09000.00998 1.09000.00999 1.08460.06200 1.08421.04700	INV ADJ PHARMACY INV ADJ MATERIALS (EXP) REPAIRS & MAINTENANCE EMPLOYEE WEARING APPAREL TRADE DAVABLES	2,153.31 5,340.00 3,511.96 257.38	11 262 65	
1.02021.00000	TRADE PAYABLES	11,262.65	11,262.65 11,262.65	

APPENDIX A - POSTED ADJUSTMENTS AND FINANCIAL STATEMENTS RECLASSIFICATION ENTRIES

Audit Adjustments and Reclassifications				
9 CAJE To reclass collections from AR Suspense				
1.01023.00500	DUE FROM GOV GUAM	116,963.40		
1.02920.00103	GOVGUAM SUBSIDY	160 021 20	116,963.40	
1.01024.12001 1.01023.00500	A/R SUSPENSE-DRT DUE FROM GOV GUAM	169,031.29	169,031.29	
1.01023.00300	A/R SUSPENSE-DRT	96,546.09	109,031.29	
1.01024.03000	A/R SUSPENSE-MIP/CASH	30,340.03	96,546.09	
1.01024.12001	A/R SUSPENSE-DRT	99,075.36	30,0.0.03	
1.02920.00103	GOVGUAM SUBSIDY	,.	99,075.36	
	- -	481,616.14	481,616.14	
	10 CATE To made as Martinus from AB Commons			
1.01024.12001	10 CAJE To reclass collections from AR Suspense A/R SUSPENSE-DRT	63,543.32		
1.01024.12001	A/R SUSPENSE-DRT	03,343.32	65,093.32	
1.08550.02600	COLLECTION EXPENSE	1,550.00	05,055.52	
1.01024.12001	A/R SUSPENSE-DRT	25,282.10		
1.01024.12001	A/R SUSPENSE-DRT	·	26,282.10	
1.08550.02600	COLLECTION EXPENSE	1,000.00		
1.01024.12001	A/R SUSPENSE-DRT	148,216.67		
1.01024.12001	A/R SUSPENSE-DRT	2 425 00	151,641.67	
1.08550.02600 1.01024.12001	COLLECTION EXPENSE A/R SUSPENSE-DRT	3,425.00 88,825.42		
1.01024.12001	A/R SUSPENSE-DRT	88,825.42	91,375.42	
1.08550.02600	COLLECTION EXPENSE	2,550.00	91,373.42	
1.00330.02000	-	334,392.51	334,392.51	
	-		•	
	11 CAJE To record allowance for prior year receivable from DOC			
1.05810.00090	DOC - Bad debts	1,719,042.12	1 710 010 10	
1.01049.00000	ALLOW FOR CONTRACTUAL ADJ - DOC	1,719,042.12	1,719,042.12 1,719,042.12	
	=	1,/19,042.12	1,/19,042.12	
	12 CAJE To record impairment for Z-Wing			
1.05220.01100	IMPAIRMENT LOSS	400,000.00		
1.01271.01100	ALLOWANCE FOR IMPAIRMENT		400,000.00	
	=	400,000.00	400,000.00	
	13 CAJE To reduce legal contingency			
1.02030.00000	ACCRUED LEGAL EXPENSE	1,573,372.00		
1.08610.02301	SETTLEMENT OF LITIGATIONS	1,3/3,3/2.00	1,573,372.00	
1.00010.02501		1,573,372.00	1,573,372.00	
		, ,		

APPENDIX A - POSTED ADJUSTMENTS AND FINANCIAL STATEMENTS RECLASSIFICATION ENTRIES

Audit Adjustments and Reclassifications Journal Entries - AJE				
1.01050.00000 1.05810.00010 1.05810.00020 1.05810.00060 1.05890.00080	1 AJE To adjust allowance BAD DEBTS BUCKET CONTRACTUAL ADJUSTMENTS-MEDICARE CONTRACTUAL ADJUSTMENTS-MEDICAID CONTRACTUAL ADJUSTMENTS-SELECTCA BAD DEBTS - SELF PAY	8,876,000.00 1,875,000.00 2,461,000.00 13,212,000.00	11,886,000.00 1,326,000.00 13,212,000.00	
1.02150.00000 1.01500.00000 1.02034.00000 DT-04 DT-05 DT-06 DT-07 DT-08 DT-09 1.08814.00000	2 AJE To record GASB 68 and 73 at 09/30/2019 DEFERRED INFLOWS FROM PENSION DEFERRED OUTFLOWS FROM PENSION NET PENSION LIABILITY Pension expense - Nursing Pension expense - Professional Support Pension expense - Aministrative Support Pension expense - Fiscal Services Pension expense - Administation Pension expense - Medical Staff PENSION EXP (CONTRA DEFF OUTFLOW	941,515.00 2,510,976.00 3,452,491.00	177,115.00 2,019,640.00 663,948.00 297,340.00 121,220.00 104,896.00 51,315.00 17,017.00	
DTT .08411.00 DTT .08412.00	3 AJE To record ad hoc COLA and supplemental benefits Retiree Ad hoc COLA and supplemental benefits Transfers from GovGuam - Ad hoc COLA and supplemental benefits	1,636,748.00 1,636,748.00	1,636,748.00 1,636,748.00	
1.01501.00000 1.02033.00000 1.02151.00000 DT-10	4 AJE To record GASB 75 at 09/30/2019 DEFERRED OUTFLOWS OF RES-OPEB OPEB LIABILITY DEFFERED OUTFLOWS OF RESOURCES Retiree OPEB Expense	43,772,586.00 1,588,513.00 45,361,099.00	4,397,927.00 40,963,172.00 45,361,099.00	

APPENDIX A - POSTED ADJUSTMENTS AND FINANCIAL STATEMENTS RECLASSIFICATION ENTRIES

Audit Adjustments and Reclassifications Journal Entries - RJE				
CO-Dept-Acct	Name	Debit	Credit	
1.02032.00000 DTT .06212.00	RJE To reclassify current portion of annual leave ACCRUED ANNUAL LEAVE ACCRUED ANNUAL LEAVE - CURRENT PORTION	1,881,292.00	1 001 202 00	
DII .06212.00	ACCRUED ANNUAL LEAVE - CURRENT PORTION	1,881,292.00	1,881,292.00 1,881,292.00	
1.02920.00100 DT-11	2 RJE To reclass reimbursements of expenses related to DOC DOA SUBSIDY Other Revenue (DOC)	2,129,272.00	2,129,272.00	
		2,129,272.00	2,129,272.00	
1.05650.00000 DT-12	3 RJE To reclassify capital contributions from GEDA DONATIONS Capital Contributions from GEDA	547,078.59 547,078.59	547,078.59 547,078.59	

APPENDIX B - UNPOSTED ADJUSTMENTS AND FINANCIAL STATEMENT RECLASSIFICATION ENTRIES

		Balance Sheet		Income Statement	
Misstatement Description	Type of Mistatement	Assets Dr (Cr)	Liabilities Dr (Cr)	Net Position Dr (Cr)	Revenue Expenses Dr (Cr)
To reclassify estimated valid patient credit balances	Extrapolated	294,841	(294,841)		
		294,841	(294,841)	0	0

APPENDIX C - DISCLOSURE MISSTATEMENTS

Disclosure	Description of Disclosure Misstatement	Amount
Discrete Presentation of CU Financials	Inclusion of GMHVA financial statements	387,126
		387,126