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The Honorable Mayor
Members of the Board of Trustees
Village of Willowbrook, Illinois

In planning and performing our audit of the financial statements of the governmental activities, the business-type activities, each major fund and the aggregate remaining fund information of the Village of Willowbrook, Illinois (Village) as of and for the year ended April 30, 2017, in accordance with auditing standards generally accepted in the United States of America, we considered the Village'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 Village's internal control. Accordingly, we do not express an opinion on the effectiveness of the Village'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 significant deficiencies or material weaknesses and, therefore, there can be no assurance that all deficiencies, significant deficiencies or material weaknesses have been identified. However, as discussed below, we identified certain deficiencies in internal control that we consider to be a material weakness.

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 of the Village's financial statements on a timely basis. A deficiency in design exists when a control necessary to meet a control objective is missing or an existing control is not properly designed so that, even if the control operates as designed, a control objective would not be met. A deficiency in operation exists when a properly designed control does not operate as designed or when the person performing the control does not possess the necessary authority or competence to perform the control effectively.

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.

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 Village's financial statements will not be prevented or detected and corrected on a timely basis.

We observed the following matters that we consider to be a material weakness and a deficiency.

Material Weakness

Financial Reporting - Restatement

Comments: The 2016 financial statements were restated to correct the net position related to the police pension plan deferred inflows and deferred outflows in accordance with GASB Statement No. 68, *Accounting and Financial Reporting for Pensions – an Amendment of GASB Statement No. 27,* which was implemented for fiscal year ending

April 30, 2016. This Statement requires that most changes in the net pension liability be included in pension expense in the period of the change. The effects of certain other changes in the net pension liability are required to be included in pension expense over the current and future periods. The effects on the total pension liability of (1) changes of economic and demographic assumptions or of other inputs and (2) differences between expected and actual experience are required to be included in pension expense in a systematic and rational manner over a closed period equal to the average of the expected remaining service lives of all employees that are provided with benefits through the pension plan (active employees and inactive employees), beginning with the current period. The effect on the net pension liability of differences between the projected earnings on pension plan investments and actual experience with regard to those earnings is required to be included in pension expense in a systematic and rational manner over a closed period of five years, beginning with the current period. Changes in the net pension liability not included in pension expense are required to be reported as deferred outflows of resources or deferred inflows of resources related to pensions.

The police pension actuary report provided for the fiscal year ending April 30, 2016, included only the fiscal year 2016 deferred inflows and outflows and related amortization even though it was titled “current and prior reporting periods.” The result of the omission in the actuary’s report was that the amortization of fiscal year 2015’s outflow and inflow activity was not properly recorded for fiscal year ending April 30, 2016. A restatement was identified to correct in the amount of $278,848 for deferred inflows and $1,221,341 for deferred outflows, net increase to net position of $843,493.

Recommendations: We recommend that the Village implement procedures to ensure that the amounts recorded for deferred inflows and outflows include the effects of current year and prior year activity.

Management’s Response: While Village staff was calculating the amounts for the journal entries to record the changes in the net pension liabilities and related accounts for April 30, 2017, we noted to the auditor that the April 30, 2016 balances as reported in the actuary’s report plus the fiscal year 2017 changes did not reconcile to the April 30, 2017 balances and we requested assistance from them in interpreting the amounts. Subsequently, the auditor noted that the police pension actuary had not included the effect of 2015 annual amortization in the 2016 report, despite the fact that his report was titled indicating that it did, in fact, include these balances. A three-way telephone conference between the Village, the auditors and the actuary confirmed that the actuarial report used to present these amounts in the Village’s April 30, 2016 financial statements was incorrect. Since April 30, 2016, was the first year this accounting pronouncement was implemented, it was not obvious that the report was incorrect. With the assistance of the auditor, we have developed a spreadsheet to prove out the actuary’s calculated numbers to prevent this from occurring in the future.

Control Deficiency

Entity Level Controls

Previously Reported Comments

Comments: We have considered the internal control structure, including the risk of fraud, at the Village in order to determine our audit procedures. The Village does not perform a formal fraud risk assessment and has no formal fraud prevention program. Fraud prevention requires a system of rules that minimize the likelihood of fraud occurring and at the same time maximizes the possibility of detecting any fraudulent activity. A strong fraud prevention program should incorporate the five interrelated components of internal control:

- Control environment.
- Risk assessment.
- Control activities.
- Information and communication.
- Monitoring.

Recommendations: We recommend that the Village document and adopt a formal fraud prevention program. The program should document the policies, procedures and strategies related to the five components of internal control and all components should be reviewed. The control environment sets the moral tone and is the base on which all of the other aspects of internal control are built. It is necessary that top management be responsible for the internal control and fraud prevention programs of the Village.

Current Year Status: The fraud risk assessment is in the process of being addressed by the Village. **This control deficiency is repeated.**

Management's Response: The Village has a system of internal controls in place over each area of financial transactions, and has written documentation detailing those controls which we have provided to the auditors for many years. In addition, the Village has procedural memos detailing how each of its financial processes is performed. Unfortunately, due to limited staff, the Village has not been able to perform a formal fraud risk assessment and implement a formal fraud prevention program of the scope suggested by the auditors. However, the Village remains committed to creating a policy to address these issues. In July 2013, the Village, utilizing an outside consultant, began a formal technology assessment of each of its financial processes. As of April 30, 2016, the technology assessment has been completed and the Village has already implemented some new controls during the software implementation process. In addition, the Village conducted a payroll compliance review in FY 2015-16 using an outside consultant to review the Village's payroll processes and recommend any necessary changes. The Village has requested a sample fraud assessment policy to assist in developing a Village specific policy. During FY 2016-17, the Village began implementing changes to our payroll process as a result of recommendations noted in the payroll review. In addition, the Village implemented Positive Pay with our local bank for all accounts payable checks to mitigate the risk of fraud of Village checks being altered. In addition, the Village has segregation of duties with respect to wire and ACH transfers such that three separate employees each have a role in the process to strengthen the internal controls. Finally, the Village instituted a new travel policy effective January 1, 2017, in accordance with state law to provide additional oversight over Village expenditures. The Village is committed to improvement over our financial processes and implements continual enhancements as much as our limited level of staffing permits.

Management's written response to the material weakness and deficiency identified in our audit has not been subjected to the auditing procedures applied in the audit of the financial statements, and accordingly, we express no opinion on it.

Other Matters

Although not considered material weaknesses, significant deficiencies or deficiencies in internal control over financial reporting, we observed the following matters and offer these comments and suggestions with respect to matters which came to our attention during the course of the audit of the financial statements. Our audit procedures are designed primarily to enable us to form an opinion on the financial statements and, therefore, may not bring to light all weaknesses in policies and procedures that may exist. However, these matters are offered as constructive suggestions for the consideration of management as part of the ongoing process of modifying and improving financial and administrative practices and procedures. We can discuss these matters further at your convenience and may provide implementation assistance for changes or improvements.

Future Pronouncements

GASB Statement No. 75, Accounting and Financial Reporting for Postemployment Benefits Other Than Pension (GASB 75)

GASB 75 replaces the requirements of GASB Statement No. 45, *Accounting and Financial Reporting by Employers for Postemployment Benefits Other Than Pensions*. GASB 75 requires governments to report a liability on the face of the financial statements, in accordance with the following:

- Employers that are responsible only for OPEB liabilities for their own employees and that provide OPEB through a defined benefit OPEB plan administers through a trust that meets specified criteria will report a net OPEB liability (the difference between the total OPEB liability and the assets accumulated in trust to make the benefit payments).
- Employers that participate in a cost-sharing OPEB plan that is administered through a trust that meets specified criteria will report a liability equal to the employer's proportionate share for the collective OPEB liability for all employers participating in the plan.

- Employers that do not provide OPEB through a trust that meets specified criteria will report the total OPEB liability for their own employees.

GASB 75 requires more extensive note disclosures and required supplementary information (RSI) about the OPEB liabilities. GASB 75 is effective for fiscal years beginning after June 15, 2017, and requires restatement of any prior years presented, if practical.

While not effective in the short term, we recommend the Village begin assessing the potential impact on the financial statements of both of these statements and begin the process of communicating this impact with those charged with governance and other stakeholders. Similar to the adoption of GASB Statement No. *68, Accounting and Financial Reporting for Pensions*, the adoption of GASB 75 will require advance coordination with plans and actuaries so that the required information is available.

GASB Statement No. 82, Pension Issues (GASB 82)

GASB 82 provides amendments to pension guidance in GASB 67 and 68 based on three issues raised during implementation of those standards. It changes the payroll amount presented in required supplementary information back to covered payroll, being the amount on which contributions to the pension plan are based. It specifies that an actuarial valuation is not inconformity with the pension standards if it includes a deviation from the Actuarial Standards of Practice in the selection of assumptions. GASB 82 also specifies that payments made by employers to satisfy employee contribution requirements should be considered employee contributions and recognized as expense or expenditure in the same manner as other compensation.

GASB 82 is effective for financial statements for fiscal years beginning after June 15, 2016, with the exception of the provision related to a deviation from Actuarial Standards of Practice, which will be effective for fiscal years in which the measurement date is on or after June 15, 2017. Earlier application is encouraged.

GASB Statement No. 84, Fiduciary Activities (GASB 84)

GASB Statement No. 84, *Fiduciary Activities* (GASB 84): GASB 84 establishes criteria for identifying fiduciary activities. It presents separate criteria for evaluating component units, pension and other postemployment benefit arrangements, and other fiduciary activities. The focus is on a government controlling the assets of the fiduciary activity and identification of the beneficiaries of those assets. Fiduciary activities are reported in one of four types of funds: pension (and other employee benefit) trust funds, investment trust funds, private-purpose trust funds or custodial funds. Custodial funds are used to report fiduciary activities that are not held in a trust. The agency fund designation will no longer be used. GASB 84 also provides guidance on fiduciary fund statements and timing of recognition of a liability to beneficiaries.

GASB 84 is effective for financial statements for fiscal years beginning after December 15, 2018. Earlier application is encouraged.

GASB Statement No. 85, Omnibus 2017 (GASB 85)

GASB Statement No. 85, *Omnibus 2017* (GASB 85): GASB 85 addresses practice issues that have arisen during implementation of other GASB standards. Among the topics addressed are blending of component units for a business-type activity that reports in a single column, presentation of goodwill from acquisitions that occurred prior to GASB 69, valuation of money market and certain other investments, and certain issues relating to pensions and other postemployment benefits. These updates either provide clarification, correction or additional guidance on the topics covered.

GASB 85 is effective for financial statements for fiscal years beginning after June 15, 2017. Earlier application is encouraged. Governments do have the option to early adopt by topic, rather than the entire standard, as long as all provisions for that topic are adopted at the same time.

GASB Statement No. 86, Certain Debt Extinguishment Issues (GASB 86)

GASB 86 eliminates an inconsistency in the literature related to in-substance defeasance of debt. Under previous guidance, debt could only be considered defeased if there was a refunding. GASB 86 now allows defeasance treatment even if the government uses existing assets and does not issue new debt. However, any resulting gain or loss will be recognized in the period of the defeasance. GASB 86 also includes guidance on handling prepaid insurance in any debt extinguishment. Additionally, there is a new requirement for all in-substance defeasances to disclose any ability to substitute risk-free monetary assets with those that are not.

GASB 86 is effective for financial statements for fiscal years beginning after June 15, 2017. Earlier application is encouraged.

GASB Statement No. 87, Leases (GASB 87)

GASB 87 establishes a single approach to accounting for and reporting leases by state and local governments. The standard addresses the reporting for governments that are lessors or lessees. GASB 87 is effective for reporting periods beginning after December 15, 2019, with earlier application encouraged.

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This communication is intended solely for the information and use of management, the Mayor, the Board of Trustees and others within the organization and is not intended to be and should not be used by anyone other than these specified parties.

BKD, LLP

Oakbrook Terrace, Illinois
October 4, 2017