Lake Champlain-Lake George
Regional Planning Board

Governance Over Loan Operations

SEPTEMBER 2019
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Report Highlights

Lake Champlain-Lake George Regional Planning Board

Audit Objective

Determine whether the Board provided adequate oversight of the revolving loan program.

Key Findings

- The Lake Champlain-Lake George Regional Planning Board (RPB) did not monitor its loan program.
- Delinquent loans were not properly enforced.

Key Recommendations

- Ensure that the Director and Loan Committee prepare loan status reports for the Board.
- Ensure that loans are properly enforced.

Regional Planning Board officials generally agreed with our recommendations and have initiated, or indicated they planned to initiate corrective action.

Background

The Lake Champlain-Lake George Regional Planning Board (RPB) was created in 1967 by the five participating boards of Clinton, Essex, Hamilton, Warren and Washington Counties. The RPB is governed by a 15-member board (Board) composed of three members appointed by each of the participating counties. The Board-elected Chairman is the chief executive officer and, along with the Board-appointed Director, is responsible for the day-to-day activities of the RPB. The RPB has a 10-member Loan Administration Committee (Committee) to review and approve business loans from its revolving loan funds program.

The Board elected a new Chairman on June 12, 2018. The former Director resigned on June 30, 2018 and a new Director was subsequently appointed.

Quick Facts

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<td>Outstanding loans as of June 30, 2018</td>
<td>55</td>
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<td>Loan balances as of June 30, 2018</td>
<td>$3.5 million</td>
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Audit Period

January 1, 2015 – July 31, 2018
Revolving Loan Program

According to the RPB’s revolving loan program policies and procedures, “the strategic purpose of the loan program is to provide low interest business loans that result in long-term job creation and increased industrial and commercial development activity.” Further, the loan program is intended to provide loans to businesses who were unable to obtain traditional financing from a bank. The RPB administers two loan programs:

- The Revolving Loan Fund Program consisting of 48 loans with a principal balance of $3.1 million outstanding as of June 30, 2018.
- The Intermediary Relending Program consisting of seven loans with a principal balance of $351,000 outstanding as of June 30, 2018.

Loans are issued to small businesses based on the review and approval of a standard loan application. Applicants are not charged an application filing fee. However, if the loan is approved, they are responsible for all legal, filing and closing fees. In addition, the borrower is charged an annual interest rate of generally 5 percent, with loan terms of five to 15 years. A portion of the interest is used to cover administrative costs and the principal, and any interest not used for administrative purposes is returned to the loan program for re-lending.

The Revolving Loan Fund Program was capitalized by four separate grants totaling more than $2.52 million issued between 1985 and 2012 from the United States Department of Commerce - Economic Development Administration (EDA). These four grants and related business loan activity are accounted for by the RPB in three separate loan funds. These grants are not required to be repaid to the EDA. The Intermediary Relending Program (IRP) was capitalized by two loans issued in 1990 and in 1994 totaling $1.25 million from the United States Department of Agriculture (USDA). Under the loan agreement with the USDA, the loans are required to be repaid over a 30-year period at an annual interest rate of one percent. The IRP funds and small business loan activity are accounted for by the RPB in a separated loan fund.

How Should a Revolving Loan Fund Be Managed?

The Board is responsible for ensuring loans are issued to credit worthy borrowers for allowable purposes and that subsequent loan repayments are made timely in accordance with the loan agreement. Policies and procedures should be developed and adopted for approving, collecting, monitoring and enforcing loans. These procedures should include the requirements the applicants must meet in

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1 The RPB administers the Lake Champlain-Lake George Regional Planning Development Corporation’s Intermediary Relending Program under a memorandum of understanding signed on November 14, 1989.

2 The outstanding loan balance increased to $3.1 million due to loan interest earnings that was not used to fund administration of the loan program.
order to participate in the loan program and the criteria for which loan funds may be used. The Board should also require both Board and Committee members and employees involved in the review and approval of loan application to disclose any personal relationship with an applicant or personal interest in a loan and recuse themselves from voting on such applications.

As a best practice, the Board should implement underwriting standards (e.g., performing a detailed credit analysis before approving a loan application) to ensure that applicants have the ability to repay loans either through income generated by the associated business or, in the case of default, an appropriate amount of collateral is pledged to repay the outstanding loan balance. Procedures should include obtaining and analyzing the applicant’s loan application, credit history, income history, financial statements, tax returns, business plan and adequacy of any pledged collateral. To ensure all required documentation is collected, a checklist or other system of tracking documentation should be implemented. Further, the value of any pledged collateral, if in the form of property, should be verified through an appraisal. The Board should require periodic reports regarding the status of loans approved by the Committee since the last Board meeting and the payment status of all open loans, including those that are delinquent and in default. Any changes in loan payment terms, enforcement action or the write-off of defaulted loans should be reported to and approved by the Board.

Loan Administrative Procedures Are Not Reviewed and Approved by the Board or Distributed to the Committee Members

The Revolving Loan Program’s written policies and procedures (loan procedures) prepared by the former Director required loan applicants to submit a loan application with a business plan, tax returns, credit report and bank denial letter. The Committee was then required to hold a meeting to review, discuss and either approve or deny the loan application, or request additional information from the applicant, if necessary. The loan procedures required, at a minimum, that the Committee’s review of the loan application include a discussion of six key points related to the business applying for the loan, including character, past borrowing history, capitalization, market condition of the company, collateral to be pledged and the management’s business skills. The procedures also included a list of projects and activities loan funds were not to be used for such as refinancing of existing debt and speculative activities.
The loan procedures were not reviewed and adopted by the Board. While loan procedures were prepared by the former Director and submitted\(^3\) to the U.S. Department of Commerce for review and approval, the current Director could not provide any evidence that the Board reviewed and approved the policies and procedures. According to two Committee members, the revolving loan program procedures were not distributed to them and the Board did not ensure the committee complied with the procedures. As a result, the Committee members were unaware of the defined criteria for evaluating and approving or denying loan applications, and what the loan funds can be used for.

**Loan Application and Approval Records Were Inadequately Documented**

The loan procedures require the borrower to submit a complete loan application and other required documents for review by the Committee, however, this procedure was not followed. The former Director collected and assembled all the loans’ applications and supporting documentation, maintained the loan files, distributed the applications to the Committee members prior their meetings. We reviewed the files for all 26 of the loans approved during our audit period, which totaled more than $2.3 million, and found that the former Director did not maintain any summary or application checklist for any of the loan files to ensure all required documentation was submitted by the borrowers, prior to the submittal of the applications to the Committee. We also reviewed the Committee’s meeting minutes and while they stated whether a loan application was approved or denied by the Committee, they did not document who attended each meeting, how each member in attendance voted, whether a quorum was present, or if the Committee held discussions on the loan applications including the six key points required by the loan procedures.

Additionally, we found numerous loan applications were missing required information pursuant to the loan procedures. More specifically, we found 18 applications were incomplete and/or lacked required information such as a business plan or bank denial letter. For example, one borrower requested by e-mail a second loan of $10,000 for his newly established business venture five months after approval of his first loan from the RPB for $25,000. No loan application, pledge of collateral, bank denial, credit report or interim-financial records were submitted for the second loan, however the Committee approved the loan. The two loans were combined for a total of $35,000. After receiving the second loan for $10,000, the borrower did not make any more payments on the combined loan and defaulted. Had the Committee required a new application requiring additional collateral on the second loan and reviewed the borrower’s current business operating results, they may have determined that the applicant’s business was in financial trouble and limited their losses to only the first loan.

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\(^3\) The last two submittals were in 2012 and in 2018.
We also found 15 loans may have lacked sufficient collateral to protect the RPB in the event of a default on the loan. We found the Committee did not verify the value of property, real estate, business assets or inventory pledged as collateral. Eighteen of the loans had real property pledged as collateral and we found that while one applicant provided a property appraisal, the committee did not have appraisals conducted on any of the other properties. We compared values of the pledged property included in the applications to the related property tax assessments to determine if the reported market value of the properties appeared reasonable.\(^4\) In six instances, the value of the pledged property may have been overstated by the applicant and consequently may not be sufficient to protect against potential default on loan payments. For example, one borrower pledged a lien on his business property and one parcel of land for a $150,000 loan. According to the 2018 assessment roll, the property was assessed at $35,650, however the loan application states the land proposed as collateral had a market value of $225,000. There is no appraisal on file for the parcel or for the borrower’s business property and no evidence the collateral was reviewed prior to approving the loan.

The Board also did not ensure that the Committee approved loans for only eligible purposes. According to the loan procedures, the loan program is intended to promote “sustainable economic development” and the funds may not be used for a variety of purposes including speculative and paying off existing debt. However, we found that three of the loans approved by the Committee during our audit period were not for an allowable purpose. For example, one loan appeared to be used to purchase land and may have been for speculative purposes (logging and sale of lumber), and another loan was intended to be used to pay off a balloon loan payment to a third party. The third loan did not appear to be used for the original purpose of the loan. Without an effective process to monitor the loan approval process, the Board cannot be assured that loans are issued to only eligible borrowers for an allowable purpose.

**The Board Did Not Adopt a Code of Ethics Policy**

While the RPB and Committee by-laws require Board and Committee members to be disqualified from voting on matters where they have a personal interest, the RPB did not have a formal Code of Ethics requiring disclosure of any potential conflicts involving members of the Board and its committees. During our audit period, the Committee approved a loan to a small business owner who was related to two RPB Board members (one appointed and one ex-officio). At the time of the loan’s approval, one of the two members was also on the Committee. However,

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\(^4\) Assessed values with 100 percent equalization rate were used as best indication of approximate market values.
we found no documentation in the minutes of the Board or the Committee meeting disclosing the Board members’ relationship to the borrower. Additionally, since the Committee meeting minutes do not indicate which members are in attendance at the meetings, we could not verify if the related Committee member attended and voted on the loan made to his relative. Failure to establish a Code of Ethics increases the risk that transactions involving the RPB and its key members are not in the RPB’s best interest.

The Board Does Not Ensure Loan Funds Are Used as Intended

Our examination of the loan files for the 26 loan applications approved during our audit period found no evidence that the Committee or RPB staff followed-up with borrowers to determine how the loan funds were used or whether any jobs were created as a result of the use of loan proceeds. We judgmentally selected four of the loans and observed the business locations to determine if there was evidence that the loan funds were used for the intended business construction/renovations stated on the loan applications. While three of the businesses appeared to be in operation and had evidence of recent construction/renovations, the fourth business did not appear to be in operation. This borrower was approved for an $86,000 loan to open a new start-up business. However, while the loan funds were disbursed on November 3, 2017, we observed that as of December 7, 2018, the business was not in operation at this location and there was no evidence of renovation to the related buildings. The former Director and two Committee members told us that after the loan funds are disbursed, they do not follow-up with the borrowers on how the loan funds were used or whether any jobs were created. Without an effective process to monitor how the loan funds are used, the Board cannot be assured that loans are issued as intended to promote economic development and job creation in the region.

Loan Payments Were Inadequately Enforced

Monthly loan payments are collected by the RPB’s bank and the bank reports these collections to the RPB on an account statement by loan fund as the payments are received. Included in these statements is a report of all past due loans, the number of days the loan payment is past due and the balance past due. A bank official told us that a late penalty of 5 percent is assessed and a late notice is sent to the borrower if they are 10 days late. Late notices are also sent after 30 days, 60 days and then again after 90 day, if no payment is received.

Loan procedures require the Committee and Director to work with loan recipients to ensure loan payments are made timely and on a discretionary basis which can involve restructuring terms of the loan or allowing partial payments. In the event a loan becomes delinquent, late payment letters are required to be sent after 30, 60 and 90 days late. After 120 days, the loan is to be turned over to the RPB’s attorney for collection and/or foreclosure.
The former Director and Committee did not adequately monitor and ensure loan enforcement procedures were followed and that late fees were collected, nor did it authorize changes in loan terms. The Board also did not require periodic reports of loan program’s activities and the status of outstanding loans. In practice, the Board provided no oversight of the loan program and only received summary information on the new loans issued.

We judgmentally selected 25 open loans as of July 31, 2018. We obtained the borrower’s loan payment transaction history from the RPB’s bank to verify that payments were made timely and in accordance with the signed loan agreement and loan payment amortization sheet. We found loan payments were not made timely, late fees were not enforced and loan terms were modified without Board approval as follows:

- Eleven loans had $44,503 in past due interest and $77,561 in past due principal as of July 31, 2018. Our review found that while the bank automatically sends out 10, 30, 60 and 90-day reminder notices of past due payment, there was little documentation in the loan files of any enforcement by the RPB to encourage the borrowers to pay timely or enforce past due balances. For example, we observed that for one loan of $50,000, disbursed on May, 23, 2017, the borrower made no payments on the loan. However, the only actions documented in the loan file were two late payment notice letters sent by the former Director. We found no action was taken to refer the loan to the RPB attorney for collection and/or foreclosure.

- Fourteen loans had a total of $10,829 in unpaid late fees. We found no documentation in the loan files enforcing collection of these late fees. The RPB’s bank representative told us that the bank had a standing order with the former Director to waive any late fees when paid. No documentation of this directive could be provided by the bank. However, we did observe periodic waiver forms in the loan files signed by the former Director waving late fees. According to the loan payment transaction histories, at least eight loans had late fees waived. For example, one borrower made 27 of his 35 monthly payments more than 10 days late incurring $1,601 in late fees of which $975 were paid and subsequently waived and reclassified by the bank as an unscheduled principal payments.

- Eight loans had interest only payment terms authorized by the former Director during our audit period. These terms were generally for six months and in some cases extended for longer periods. We found a lack of documentation on file documenting the reason for these terms and they were not communicated to and approved by either the Committee or the RPB Board.
Two loans had payments deferred for six months as authorized by the former Director. There was no justification or support this change in repayment terms in the loan files or indication the Board approved the change.

We also examined all 15 loans, with total outstanding principal balance of $728,848, that were more than 90 days delinquent as of July 31, 2018 and found insufficient enforcement efforts were made to encourage and/or demand payment for 14 of the 15 loans as follows:

- All 15 loan files lacked a contact sheet documenting any communication with borrowers to enforce payment. The current Director implemented a contact sheet during our audit.
- While the RPB bank sent late payment notices in a timely manner, 11 of the loans lacked timely late payment notification letters sent by the RPB.
- There was no indication in the loan files for 12 of these loans that the borrowers were called by the RPB staff after becoming 60 days late on the payments.
- Ten of the loans were not turned over to the RPB attorney for collection after exceeding 120 days nonpayment.
- Eleven loans did not have any indication of legal action or foreclosure action being taken. This was generally due to not having a first lien on property pledged as collateral or ensuring sufficient collateral was obtained prior to approving the loan.
- Fourteen loans had changes in the loan terms; however, these changes were not communicated to and approved by the Committee.

The Board’s failure to implement an adequate procedures for the monitoring of the status of outstanding loans and lack of enforcement on delinquent loans increases the risk that loan repayments may not be made timely, late fee revenues may not be realized, loan repayment terms are not modified in the best interest of the RPB and further increases the risk that errors or irregularities could occur and not be detected.

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5 Six of these were also included in our sample of 25 loans for testing of payment timeliness.
Loan Write-Offs for Uncollectable Loans Were Not Authorized by the Board

The Board and Committee did not authorize the write off of uncollectable loans. During our audit period, two loans totaling $110,000 in principal, interest and late fees were written off. However, we found no documentation in the minutes of the Board or the Committee discussing or authorizing the write off of these loans. The former Director told us that he would discuss the collectability and write-off of loans with the Chairman and RPB attorney before instructing the RPB accountant to write off the loans. The former Director’s authorization to write off the loans was evidenced by journal entry notes prepared by the accountant. However, neither the former Director, nor the Chairman, communicated these write-offs to the Board. Without an effective process for the monitoring, communicating and approving the write-off of uncollectable loans, the Board is unable to effectively monitor the loan fund.

What Do We Recommend?

The Board should:

1. Adopt policies and procedures for the review and approval of loan applications, changes in loan terms, loan enforcement and write-off of uncollectable loans.


3. Enforce collection of late fees.

4. Require the Director and/or Committee to provide periodic report on the status of all loans and recommend any loan enforcement actions for approval.

5. Ensure that the Committee approves loans for only eligible purposes and an appropriate amount of collateral is pledged.

The Director and Committee should:

6. Ensure all loan applications are complete prior to approval or denial, and that an appropriate amount of collateral is pledged in case of default.

7. Ensure all loan funds are used for an eligible purpose and as intended.
September 6, 2019

Jeffrey P. Leonard, Chief Examiner
NYS Office of the Comptroller
Division of Local Government and School Accountability
One Broad Street Plaza
Glens Falls, NY 12801-4396

Dear Mr. Leonard,

The Lake Champlain – Lake George Regional Planning Board (LCLGRPB) is in receipt of the final audit report regarding the LCLGRPB’s Governance Over Loan Operations. Upon review, we agree with the findings and recommendations as stated in the report.

As of the date of this letter, the LCLGRPB Board members, the newly formed Loan Administrative Committee and new staff have undertaken all the corrective actions recommended in the report. They are fully addressed in the attached Corrective Action Plan.

We are confident that with the new policies, procedures, Board of Directors, Loan Committee members and staff in place, the LCLGRPB will once again provide adequate oversight and governance over the Revolving Loan Fund.

Thank you for your time and energy in assisting us with bettering our operations. Please feel free to contact me if you have any additional questions.

Sincerely,

David O’Brien
Chairman
LAKE CHAMPLAIN – LAKE GEORGE REGIONAL PLANNING BOARD

LAKE CHAMPLAIN – LAKE GEORGE REGIONAL PLANNING BOARD GOVERNANCE OVER LOAN OPERATIONS
Report Number: 2019M - 25

For each recommendation included in the audit report the following our corrective action(s) taken.

Recommendation 1. Adopt policies and procedures for the review and approval of loan applications, changes in loan terms, loan enforcement and write-off of uncollectable loans.

Corrective Action: Policies and procedures for the Revolving Loan Fund are directed by the LCLGRPB’s Loan Fund Management Plan (Plan). The current Director re-wrote the 2018 Plan, and the new 5-year Plan was approved by the Economic Development Administration in February 2019 and adopted by the LCLGRPB Board of Directors in April 2019 (Resolution No. 1934).

Corrective Action Date: Completed April 18, 2019


Corrective Action: The LCLGRPB Board of Director’s adopted the LCLGRPB Ethics Policy (Resolution No. 1896). This policy was reaffirmed by the Board on January 10, 2019 (Resolution No. 1925). This policy was also affirmed by the Loan Administrative Committee on January 3, 2019 (Resolution No. 2019-2).

Corrective Action Date: Completed July 25, 2018

Recommendation 3. Enforce collection of late fees.

Corrective Action: All late fees are now collectable and enforced. Each week the RLF Bank provides the LCLGRPB with a list of loans that have accrued late fees. A letter is sent to the RLF recipient every 60 days requesting payment of late fees. Late fees are no longer posted towards loan principal.

Corrective Action Date: Completed January 1, 2019

Recommendation 4. Require the Director and/or Committee to provide periodic report on the status of all loans and recommend any loan enforcement actions for approval.

Corrective Action: At each Loan Administrative Committee meeting, the Committee is provided and presented a Loan Balance Report that provides the Borrower Name, County, Original Loan Amount, Monthly Payment Amount, PY Balance Forward, YTD Principal, Interest and Total Paid, Write-Off Amount, Outstanding Loan
Principal Amount, Loan Status and Days Late. Each loan on the list is discussed individually. Enforcement actions and loan modifications are discussed by the Committee at length and approved via resolution if necessary. A similar Loan Balance Report is provided to the LCLGRPB Board of Directors by the Treasurer at Board meetings. Additionally, the Chairperson of the Loan Administrative Committee provides a narrative report to the full Board at the meetings.

Corrective Action Date: Completed January 3, 2019 and ongoing.

Recommendation 5. Ensure that the Committee approves loans for only eligible purposes and an appropriate amount of collateral is pledged.

Corrective Action: Each member of the Loan Administrative Committee has been provided with a copy of the approved Revolving Loan Fund Management Plan. The Revolving Loan Fund application has been updated and includes a list of the required documents to be submitted to the LCLGRPB for loan consideration. Among those required documents includes appraisals and/or assessment of value of equipment, not just for the loan fund expenditures but for collateral as well. This is keeping in mind, however, that under this Revolving Loan Program designed by the Federal Economic Development Administration, these loans are by nature a higher risk than traditional financing.

Corrective Action Date: Completed January 3, 2019 and ongoing.

Recommendation 6. Ensure all loan applications are complete prior to approval or denial, and that an appropriate amount of collateral is pledged in case of default.

Corrective Action: The Director has created a checklist of required documentation that must be included in the loan application packet prior to submission to the Loan Administrative Committee. The Director works with the borrower to ensure that all the documents are accounted for. This documentation also includes information on collateral, which the Committee utilizes in making their decisions on loan funding. If the loan request amount exceeds $100,001, the LCLGRPB Board Executive Committee must also approve the loan. This is keeping in mind, however, that under this Revolving Loan Program designed by the Federal Economic Development Administration, these loans are by nature a higher risk than traditional financing.

Corrective Action Date: Instated January 3, 2019 and ongoing.

Recommendation 7. Ensure all loan funds are used for an eligible purpose and as intended.

Corrective Action: Currently, the Director is working with new loan applicants to ensure that funding is utilized in the proper way. This includes follow-up phone calls, receipts for equipment purchases, and potential visits to businesses by LCLGRPB staff and/or Loan Administrative Committee members. A new position in the LCLGRPB will be hired to continue this work.

Corrective Action Date: Instated January 3, 2019 and ongoing.

Signed: ___________________________ Date: 5/8/2019
David O’Brien, Chairman
Appendix B: Audit Methodology and Standards

We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the State Comptroller’s authority as set forth in Article 3 of the New York State General Municipal Law. To achieve the audit objective and obtain valid audit evidence, our audit procedures included the following:

- We gained an understanding of the RPB’s loan program and recording practices and reporting requirements by interviewing RPB staff, Committee members and reviewing by-laws, source documentation applicable procedures.

- We examined all 26 loans approved during our audit period to determine if, the loan applications were complete and all required supporting documentation was submitted, any Board member has an interest in a loan, the applicant pledged an appropriate amount of collateral, a quorum of the Committee members met to discuss the loan application, the loan was intended to support local economic development, the loan was for an eligible project/activity, the loan approved was supported by a required committee resolution and post loan approval follow-up was completed.

- We judgmentally selected 25 open loans to determine that loan collections and adjustments/restructuring are made in accordance with legal requirements and the Board’s and/or Committee authorization. To verify that loan payments are made in full and accurately recorded we traced the payment of loans from the bank collection statement to the loan payment amortization schedule and RPB accounting records.

- We selected all 15 loans that were more than 90 days delinquent as of July 31, 2018 to determine if enforcement is present and in compliance with statutory and policy requirements.

- We selected all two loans written off during our audit period in the accounting records to determine if approval by the Board is received before writing off uncollectable loans.

We conducted this performance audit in accordance with GAGAS (generally accepted government auditing standards). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Unless otherwise indicated in this report, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or size of the relevant population and the sample selected for examination.

Good management practices dictate that the Board has the responsibility to initiate corrective action. As such, the Board should prepare a plan of action that addresses the recommendations in this report and forward the plan to our office within 90 days. For more information on preparing and filing your CAP, please refer to our brochure, Responding to an OSC Audit Report, which you received with the draft audit report.
Appendix C: Resources and Services

Regional Office Directory
www.osc.state.ny.us/localgov/regional_directory.pdf

Cost-Saving Ideas – Resources, advice and assistance on cost-saving ideas
www.osc.state.ny.us/localgov/costsavings/index.htm

Fiscal Stress Monitoring – Resources for local government officials experiencing fiscal problems
www.osc.state.ny.us/localgov/fiscalmonitoring/index.htm

Local Government Management Guides – Series of publications that include technical information and suggested practices for local government management
www.osc.state.ny.us/localgov/pubs/listacctg.htm#lgmg

Planning and Budgeting Guides – Resources for developing multiyear financial, capital, strategic and other plans
www.osc.state.ny.us/localgov/planbudget/index.htm

Protecting Sensitive Data and Other Local Government Assets – A non-technical cybersecurity guide for local government leaders

Required Reporting – Information and resources for reports and forms that are filed with the Office of the State Comptroller
www.osc.state.ny.us/localgov/finreporting/index.htm

Research Reports/Publications – Reports on major policy issues facing local governments and State policy-makers
www.osc.state.ny.us/localgov/researchpubs/index.htm

Training – Resources for local government officials on in-person and online training opportunities on a wide range of topics
www.osc.state.ny.us/localgov/academy/index.htm
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