

# ROBINSON, FARMER, COX ASSOCIATES

CERTIFIED PUBLIC ACCOUNTANTS

A PROFESSIONAL LIMITED LIABILITY COMPANY

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## Communication with Those Charged with Governance

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### To the Board of Rivanna River Basin Commission

We have audited the financial statements of Rivanna River Basin Commission for the year ended June 30, 2012, and have issued our report thereon dated September 27, 2012. Professional standards require that we provide you with information about our responsibilities under generally accepted auditing standards and *Government Auditing Standards*, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our letter to you dated March 28, 2012. Professional standards also require that we communicate to you the following information related to our audit.

### Significant Audit Findings

#### *Qualitative Aspects of Accounting Practices*

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by the Rivanna River Basin Commission are described in Note 2 to the financial statements. No new accounting policies were adopted and the application of existing policies was not changed during fiscal year 2012. We noted no transactions entered into by the Rivanna River Basin Commission during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the financial statements in the proper period.

The financial statement disclosures are neutral, consistent, and clear.

#### *Difficulties Encountered in Performing the Audit*

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

#### *Corrected and Uncorrected Misstatements*

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are trivial, and communicate them to the appropriate level of management. Management has corrected all such misstatements. In addition, none of the misstatements detected as a result of audit procedures and corrected by management were material, either individually, or in the aggregate, to the financial statements taken as a whole.

#### *Disagreements with Management*

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

### *Management Representations*

We have requested certain representations from management that are included in the management representation letter dated September 27, 2012.

### *Management Consultations with Other Independent Accountants*

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

### *Other Audit Findings or Issues*

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

### *Other Matters*

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

This information is intended solely for the use of the board of commissioners and management of Rivanna River Basin Commission and is not intended to be and should not be used by anyone other than these specified parties.

*Robinson, Farmer, Co. Associates*  
Charlottesville, Virginia  
September 27, 2012

# ROBINSON, FARMER, COX ASSOCIATES

CERTIFIED PUBLIC ACCOUNTANTS

A PROFESSIONAL LIMITED LIABILITY COMPANY

**Date:** September 27, 2012

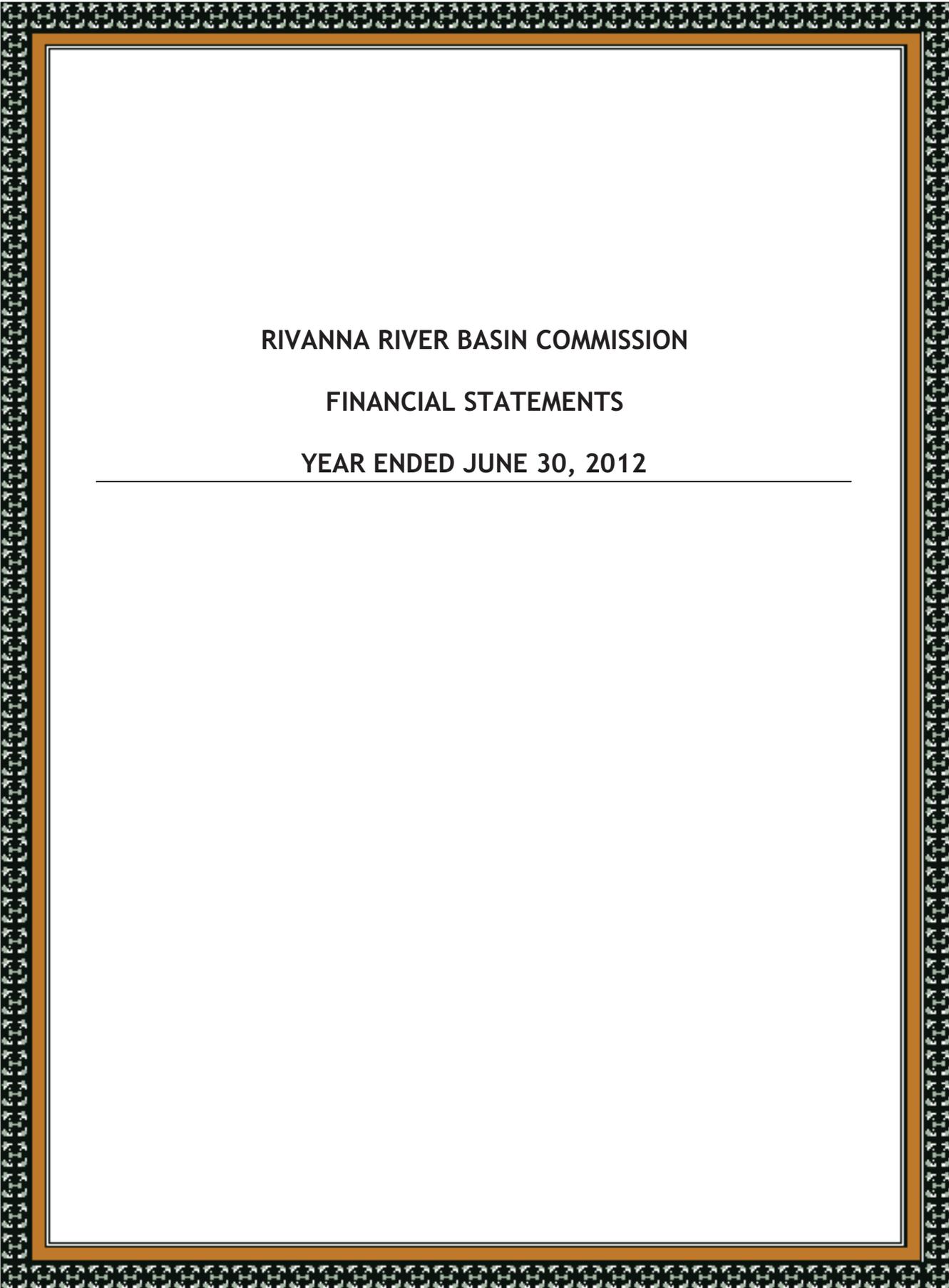
**Memorandum To:** Rivanna River Basin Commission

**From:** Robinson, Farmer, Cox Associates

**Regarding:** Audit for year ended June 30, 2012

In planning and performing our audit of the financial statements of Rivanna River Basin Commission (the "Organization"), for the year ended June 30, 2012, we considered the Organization's internal control in order to determine our auditing procedures for the purpose of expressing an opinion on the financial statements and not to provide assurance on internal control. The purpose of this memorandum is to make you aware of upcoming accounting and audit issues that may affect the organization. This memorandum does not affect our report dated September 27, 2012, on the financial statements of the Organization. We will be pleased to discuss these comments in further detail at your convenience, to perform any additional study of these matters, or to assist you in implementing the recommendations.

During our audit, we noted no matters involving the internal control structure and related operational matters that we believe should be reported to you.



RIVANNA RIVER BASIN COMMISSION

FINANCIAL STATEMENTS

YEAR ENDED JUNE 30, 2012

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RIVANNA RIVER BASIN COMMISSION  
FINANCIAL STATEMENTS  
YEAR ENDED JUNE 30, 2012

**Table of Contents**

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	<u>Page</u>
Independent Auditors' Report	1-2
 <b><u>Basic Financial Statements:</u></b>	
Exhibit 1 - Statement of Net Assets	3
Exhibit 2 - Statement of Revenues, Expenses, and Changes in Net Assets	4
Exhibit 3 - Statement of Cash Flows	5
Notes to Financial Statements	6-8
 <b><u>Other Supplementary Information:</u></b>	
Table 1 - Schedule of Operating Expenses	9
 <b><u>Compliance:</u></b>	
Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with <i>Government Auditing Standards</i>	10

# ROBINSON, FARMER, COX ASSOCIATES

CERTIFIED PUBLIC ACCOUNTANTS

A PROFESSIONAL LIMITED LIABILITY COMPANY

## INDEPENDENT AUDITORS' REPORT

**TO THE BOARD OF  
RIVANNA RIVER BASIN COMMISSION  
CHARLOTTESVILLE, VIRGINIA**

We have audited the statement of net assets of the Rivanna River Basin Commission as of June 30, 2012 and the related statements of revenues, expenses and changes in net assets, and cash flows for the year then ended. These basic financial statements are the responsibility of the Commission's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the *Specifications for Audits of Authorities, Boards and Commissions*, issued by the Auditor of Public Accounts of the Commonwealth of Virginia. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Rivanna River Basin Commission as of June 30, 2012 and the changes in its net assets and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

In accordance with *Government Auditing Standards*, we have also issued our report dated September 27, 2012 on our consideration of the Commission's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of our audit.

Management has omitted the management's discussion and analysis that accounting principles generally accepted in the United States of America require to be presented to supplement the basic financial statements. Such missing information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. Our opinion on the basic financial statements is not affected by the missing information.

Our audit was conducted for the purpose of forming an opinion on the financial statements that collectively comprise the Rivanna River Basin Commission's financial statements as a whole. The Schedule of Operating Expenses is presented for purposes of additional analysis and is not a required part of the financial statements. The Schedule of Operating Expenses is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated in all material respects in relation to the financial statements as a whole.

*Riverson, Farmer, Co. Associates*  
Charlottesville, Virginia  
September 27, 2012

## **Basic Financial Statements**

## RIVANNA RIVER BASIN COMMISSION

Statement of Net Assets  
At June 30, 2012**ASSETS**

## Current assets:

Cash and cash equivalents	\$ 98,366
Grants receivable (see note 6)	<u>145,765</u>

Total current assets	<u>\$ 244,131</u>
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## Noncurrent assets:

## Restricted assets:

Due from TNC Reserve (see note 2E)	<u>\$ 87,579</u>
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## Other Assets:

Security deposit (see note 7)	<u>\$ 685</u>
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Total noncurrent assets	<u>\$ 88,264</u>
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Total assets	<u><u>\$ 332,395</u></u>
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**LIABILITIES AND NET ASSETS**

## Current Liabilities:

Accounts payable	\$ 139,139
Accrued payroll taxes	2,814
Accrued leave (see note 5)	6,218
Deferred revenue	<u>30,781</u>

Total current liabilities	<u>\$ 178,952</u>
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## Net Assets:

Restricted	\$ 87,579
Unrestricted	<u>65,864</u>

Total net assets	<u>\$ 153,443</u>
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Total liabilities and net assets	<u><u>\$ 332,395</u></u>
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The accompanying notes to the financial statements are an integral part of this statement.

## RIVANNA RIVER BASIN COMMISSION

Statement of Revenues, Expenses and Changes in Net Assets  
Year Ended June 30, 2012

Operating revenues:	
NFWF StormWater grant	\$ 116,401
NFWF BayTMDL grant	24,641
TJPDC livable income	5,310
CCW WIP II (RCS) income	7,500
DCR Moore's Creek Project	<u>30,671</u>
Total operating revenues	\$ <u>184,523</u>
Operating expenses (see table 1):	
Grant funded	\$ 184,212
Non-grant funded	<u>62,707</u>
Total operating expenses	\$ <u>246,919</u>
Operating income/(loss)	\$ <u>(62,396)</u>
Nonoperating revenues:	
Interest earned	\$ <u>47</u>
Total nonoperating revenues	\$ <u>47</u>
Change in net assets	\$ (62,349)
Net assets, beginning of year	<u>215,792</u>
Net assets, end of year	\$ <u><u>153,443</u></u>

The accompanying notes to the financial statements are an integral part of this statement.

## RIVANNA RIVER BASIN COMMISSION

Statement of Cash Flows  
Year Ended June 30, 2012

Cash flows from operating activities:	
Receipts from grants	\$ 157,232
Payments for operating activities	<u>(226,749)</u>
Net cash provided by (used in) operating activities	<u>\$ (69,517)</u>
Cash flows from investing activities:	
Interest received	<u>\$ 47</u>
Net cash provided by (used in) investing activities	<u>\$ 47</u>
Increase (decrease) in cash and cash equivalents	\$ (69,470)
Cash and cash equivalents at beginning of year (including \$157,579 reported in restricted account)	<u>255,415</u>
Cash and cash equivalents at end of year (including \$87,579 reported in restricted account)	<u><u>\$ 185,945</u></u>
Reconciliation of operating income to net cash provided by (used in) operating activities:	
Operating income (loss)	\$ (62,396)
Adjustments to reconcile operating income to net cash provided by operating activities:	
(Increase) decrease in grants receivable	(58,072)
(Increase) decrease in prepaid expenses	685
Increase (decrease) in accounts payable	20,721
Increase (decrease) in accrued expenses	(7,454)
Increase (decrease) in accrued leave	6,218
Increase (decrease) in deferred revenue	<u>30,781</u>
Net cash provided by (used in) operating activities	<u><u>\$ (69,517)</u></u>

The accompanying notes to the financial statements are an integral part of this statement.

# RIVANNA RIVER BASIN COMMISSION

Notes to Financial Statements  
As of June 30, 2012

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## **NOTE 1—ORGANIZATION AND PURPOSE:**

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The Rivanna River Basin Commission (RRBC) was enabled by an act of the 2004 Virginia General assembly and formed officially in 2007 when four of the seven localities comprising with land in the Rivanna watershed agreed to participate (Albemarle, Fluvanna, and Greene counties and the City of Charlottesville). The early work of the Commission was made possible through several grants, including a grant of approximately \$400,000 from The Nature Conservancy in Virginia that constituted funds raised from private individuals for the work of the RRBC. RRBC's purpose is to provide guidance for the stewardship of water and natural resources of the Rivanna River Basin and promotes activities by local, state, and federal governments, and by individuals, that foster resource stewardship for the environmental and economic health of the Basin.

As defined by its statute, RRBC is an entity of local government without political subdivision status. The Commission's Board is comprised of two elected officials from each of the participating jurisdictions of Albemarle County, City of Charlottesville, Fluvanna County, and Greene County; one citizen appointee from each of the jurisdictions; and one representative each from the Culpeper and Thomas Jefferson Soil and Water Conservation Districts.

## **NOTE 2—SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES:**

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### **A. Financial Statement Presentation:**

The accompanying financial statements are prepared in accordance with pronouncements issued by the Governmental Accounting Standards Board. The principles prescribed by GASB represent generally accepted accounting principles by governmental units.

The Commission utilizes the enterprise fund method of accounting for financial reporting purposes. Enterprise fund accounting uses the accrual basis of accounting where revenues are recorded when earned and expenses are recorded when incurred, regardless of when the cash flows occur.

Operating revenues and expenses are defined as those items that result from providing services and include all transactions and events which are not capital and related financing, noncapital financing or investing activities. Nonoperating revenues are defined as investment and other income. Nonoperating expenses are defined as capital and noncapital related financing and other expenses.

The Commission applies all GASB pronouncements as well as the Financial Accounting Standards Board (FASB) pronouncements issued on or before November 30, 1989 unless these pronouncements conflict with or contradict GASB pronouncements.

When both restricted and unrestricted resources are available for use, it is the Commission's policy to use restricted resources first, then unrestricted resources as needed.

### **B. Cash and Cash Equivalents:**

Cash and cash equivalents include cash on hand, checking and savings accounts, and short-term, highly liquid investments with original maturities of three months or less.

## RIVANNA RIVER BASIN COMMISSION

Notes to Financial Statements  
As of June 30, 2012 (Continued)

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### NOTE 2—SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES: (CONTINUED)

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#### C. Restricted Assets:

Certain cash accounts held by The Nature Conservancy (TNC) for the Commission are set aside and noted as restricted cash due from the TNC reserve. The accounts are properly classified as restricted assets on the balance sheet. Regulations require the Conservancy to maintain the restricted accounts for use in approved operating activities of the Commission.

#### D. Capital Assets:

Capital assets would include property and equipment for the financial statements. Capital assets are defined by the Commission as assets with an initial individual cost of more than \$5,000 and an estimated useful life in excess of one year. Such assets are recorded at historical cost or estimated historical cost if purchased or constructed. Donated capital assets are recorded at estimated fair market value at the date of donation. For fiscal year 2012, there are no capital assets to report for the Commission.

#### E. Deferred Revenue:

Deferred revenue consists of advance payment of \$30,781 for June 30, 2012 from the DCR Moores Creek Project to start activities on the project.

#### F. Use of Estimates:

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

### NOTE 3—DEPOSITS:

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#### Deposits

Deposits with banks are covered by the Federal Deposit Insurance Corporation (FDIC) and collateralized in accordance with the Virginia Security for Public Deposits Act (the “Act”), Section 2.2-4400 et. seq. of the Code of Virginia. Under the Act, banks and savings institutions holding public deposits in excess of the amount insured by the FDIC must pledge collateral to the Commonwealth of Virginia Treasury Board. Financial Institutions may choose between two collateralization methodologies and depending upon that choice, will pledge collateral that ranges in the amounts from 50% to 130% of excess deposits. Accordingly, all deposits are considered fully collateralized.

### NOTE 4—RISK MANAGEMENT:

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The Commission is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; and natural disasters. The Commission carries commercial insurance for all of these risks of loss. Settled claims resulting from these risks have not exceeded commercial insurance coverage in any of the past three fiscal years.

## RIVANNA RIVER BASIN COMMISSION

Notes to Financial Statements  
As of June 30, 2012 (Continued)

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### NOTE 5—COMPENSATED ABSENCES:

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Commission regular employees earn vacation leave each year at a schedule rate of 10-15 days in accordance with years of service. Vacation leave can be accrued and carried to the next year up to a maximum of 80 hours. Accumulated unpaid vacation amounts are accrued when incurred. At June 30, 2012, the liability for accrued vacation leave was \$6,218.

### NOTE 6—GRANTS RECEIVABLE:

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Grants receivable consists of the following amounts at June 30, 2012:

NFWF StormWater grant	\$	94,386
NFWF BayTMDL grant		15,398
TJPDC livable income		5,310
DCR Moore's Creek Project		30,671
Total grants receivable	\$	<u>145,765</u>

### NOTE 7—LEASES:

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The Commission entered into a one year operating lease for the current office space on June 27, 2011. After year end the Commission continued the operating lease on a month-to-month basis with a 60-day notice extending through June 30, 2013. Monthly payments of \$685 are expected for fiscal year 2013.

A security deposit of one month's rent, \$685, is being held by the lessor, and is noted on the statement of net assets as an other asset. It will be received when the lease is over and the office space vacated.

Total rent expense for the year ended June 30, 2012 was \$8,220.

**Other Supplementary Information**

## RIVANNA RIVER BASIN COMMISSION

Schedule of Operating Expenses  
Year Ended June 30, 2012

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Operating expenses:	
Grant funded expenses:	
Payroll expenses	\$ 113,093
Construction	23,324
Contractual expenses	38,593
Miscellaneous	3,047
Printing and postage	1,524
Supplies	2,820
Travel	1,811
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Total grant funded expenses	\$ 184,212
Non-grant funded expenses:	
Payroll expense	\$ 31,533
Commissioner expense	137
Dues and subscriptions	65
Grants to other organizations	2,500
Insurance	2,496
Meeting expense	352
Miscellaneous	179
Office expenses	1,626
Office supplies	1,191
Professional services	11,619
Rent	8,220
Telephone	2,492
Travel	112
Web expense	185
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Total non-grant funded expenses	\$ 62,707
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Total operating expenses	\$ 246,919
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## Compliance

# ROBINSON, FARMER, COX ASSOCIATES

CERTIFIED PUBLIC ACCOUNTANTS

A PROFESSIONAL LIMITED LIABILITY COMPANY

## REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

TO THE BOARD OF  
RIVANNA RIVER BASIN COMMISSION  
CHARLOTTESVILLE, VIRGINIA

We have audited the financial statements of the Rivanna River Basin Commission, as of and for the year ended June 30, 2012, and have issued our report thereon dated September 27, 2012. We conducted our audit in accordance with auditing standards generally accepted in the United States of America; the *Specifications for Audits of Authorities, Boards, and Commissions*, issued by the Auditor of Public Accounts of the Commonwealth of Virginia; and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States.

### Internal Control Over Financial Reporting

Management of the Rivanna River Basin Commission is responsible for establishing and maintaining effective internal control over financial reporting. In planning and performing our audit, we considered the Rivanna River Basin Commission's internal control over financial reporting 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 Rivanna River Basin Commission's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Rivanna River Basin Commission's internal control over financial reporting.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis.

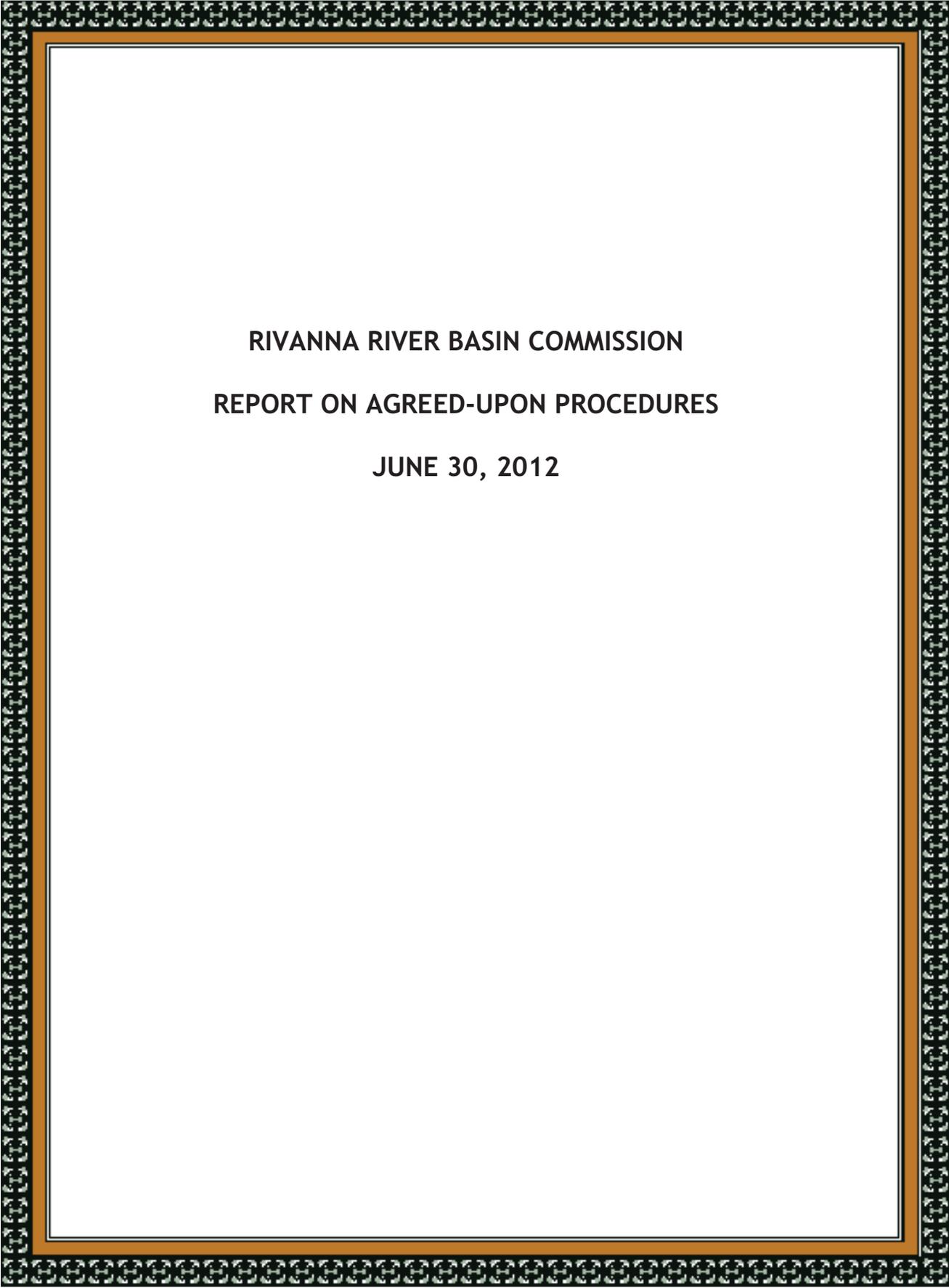
Our consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be deficiencies, significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses, as defined above.

### Compliance and Other Matters

As part of obtaining reasonable assurance about whether Rivanna River Basin Commission's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

This report is intended solely for the information and use of the Board and management, and is not intended to be and should not be used by anyone other than these specified parties.

*Robinson, Farmer, Cox Associates*  
Charlottesville, Virginia  
September 27, 2012



**RIVANNA RIVER BASIN COMMISSION**  
**REPORT ON AGREED-UPON PROCEDURES**  
**JUNE 30, 2012**

## Table of Contents

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	<u>Page</u>
Independent Accountants' Report on Applying Agreed-Upon Procedures.....	1
Schedule of Indirect Costs.....	2
Criteria Description for FAR References .....	3

# ROBINSON, FARMER, COX ASSOCIATES

A PROFESSIONAL LIMITED LIABILITY COMPANY

CERTIFIED PUBLIC ACCOUNTANTS

## INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

**Board of Commissioners  
Rivanna River Basin Commission  
Charlottesville, Virginia**

We have performed the procedures enumerated below which were agreed upon by you solely to assist you in calculating the indirect cost rate for the year ended June 30, 2012. Rivanna River Basin Commission is responsible for the Schedule of Indirect Costs. This agreed-upon procedures engagement was performed in accordance with standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the specified users of the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

### Details of Procedures Performed and Findings

#### **Indirect Cost Rate**

We reviewed the accounting records to determine those costs which are unallowable according to the cost principles contained in the Federal Acquisition Regulations (FARS). We removed these unallowable costs and calculated the indirect cost rate based on allowable costs according to the FARS. Provided below is a summary of our findings and observations:

- \$5 of bank service charges were determined unallowable
- The indirect overhead rate was calculated to be 25.81%

We were not engaged to, and did not perform an examination, the objective of which would be the expression of an opinion on the accompanying information. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the management of Rivanna River Basin Commission, and is not intended to be and should not be used by anyone other than the specified party.

*Robinson, Farmer, Cox Associates*

Charlottesville, Virginia  
September 27, 2012

RIVANNA RIVER BASIN COMMISSION

Schedule of Indirect Costs  
Year Ended June 30, 2012

	<u>Proposed</u>	<u>Adjustments</u>	<u>FAR Reference</u>	<u>Allowable</u>	<u>% Indirect Cost</u>
Audited operating expenses:					
Direct grant funded expenses:					
Payroll expenses	\$ 113,093			\$ 113,093	
Construction	23,324			23,324	
Contractual expenses	34,636			34,636	
Miscellaneous	3,047	(5) (1)	31.205-20	3,042	
Printing and postage	1,524			1,524	
Supplies	2,820			2,820	
Travel	<u>1,811</u>			<u>1,811</u>	
Total direct grant funded expenses	<u>\$ 180,255</u>			<u>\$ 180,250</u>	
Indirect non-grant funded expenses:					
Payroll expense	\$ 31,533			\$ 31,533	
Commissioner expense	137			137	
Dues and subscriptions	65			65	
Grants to other organizations	2,500			2,500	
Insurance	2,496			2,496	
Meeting expense	352			352	
Miscellaneous	179			179	
Office expenses	1,626			1,626	
Office supplies	1,191			1,191	
Professional services	11,619			11,619	
Rent	8,220			8,220	
Telephone	2,492			2,492	
Travel	112			112	
Web expense	<u>185</u>			<u>185</u>	
Total indirect non-grant funded expenses	<u>\$ 62,707</u>	<u>(5)</u>		<u>\$ 62,707</u>	
Total audited operating expenses	<u>\$ 242,962</u>	<u>(5)</u>		<u>\$ 242,957</u>	<u>25.81%</u>

RIVANNA RIVER BASIN COMMISSION

Criteria Description for FAR References  
Year Ended June 30, 2012

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(1) 31.205-20

Interest on borrowings and other financial costs are unallowable except for interest assessed by State or local taxing authorities under the conditions specified in 31.205-20.