



Auditor Insights – Tips from a Pro

by Robert M. Nordlund, PE, RS & Jeremy Newman, CPA www.ReserveStudy.com www.HOACPA.com Mar 3, 2021

Miss the webinar? Watch it <u>here</u>

In this webinar, CPA and experienced auditor Jeremy Newman provides great "insider information" – gems his frequent clients know, to help associations build a foundation of wise financial decisions. It is all those decisions, scattered throughout the year, that build the foundation for a secure future.

Key topics covered include:

- Minimizing exposure to Fraud
- Learning from your monthly Financial Reports (like your automobile's "dashboard")
- Understanding your "Basis for Accounting" (cash, accrual...)
- Audits what they are, how to prepare, and how to minimize cost
- Tax Preparation selecting between Federal Form 1120 and 1120-H
- Affordability decisions when establishing your Annual Budget

Please find the Questions and Answers portion of the program on the next page, followed by the presentation's slide-show.

Get a professional on your side - and enjoy a safe and successful "guided journey"

to the future!



For additional information, please visit:

www.ReserveStudy.com and www.HOACPA.com

WEBINAR QUESTIONS ASKED BY ATTENDEES

- Q: If you file a 1120-H Form do you still have to deal with a 70-604 Form/ruling?
- A: No. However we recommend the annual 70-604 resolution in case a situation arises where the association should file form 1120.
- Q: How do CPAs treat the balance sheet surplus, since it's a recording over all the periods and you don't have the surplus in your Operating account because it's been used over the years?
- A: If you still have a surplus in operating equity, you must have assets in excess of liabilities. If you do not have the cash, was it spent on fixed assets (which are on the balance sheet), or do you have large accounts receivable which should convert into cash upon collection? It's difficult to give a precise answer to this question without more information.
- Q: We use our CPA firm to pay our invoices. They write the checks. Is this a good idea?
- A: The CPA will not be able to provide audit or review services for you if they are performing bookkeeping/accounting services. Make sure you still have good controls for authorizing, approving, reviewing all transactions. Ensure also that bank reconciliations are performed and reviewed.
- Q: Is the general rule of thumb for budgeting for annual "Reserve Fund Contributions" to be 25.0% of the annual budget? Or should it be higher than 25.0%?
- A: The appropriate Reserve contribution rate should be what is recommended in your Reserve Study. We find that it is commonly in the range of 15-40% of total budget, as explained in this article.
- Q: I do not think our Association has ever done an audit so how far back should we go to do a thorough audit?
- A: Depending on the activity at your association, you may consider starting with the last complete year and proceed from there. If you had special assessments, settlements, large expenses in prior years I would recommend auditing those years also.

- Q: Not a question, but you may like this article on budgeting (FL).
- A: Good article, thanks for sharing with our webinar audience!
- Q: What is an average time for completion of an audit for an association of 50 unit condo and no issues that you described?
- A: If all of the records are complete and you can answer questions/provide additional information an audit should take a couple of weeks.
- Q: If an audit is provided 2 years after the audited year, how can you go back and do any adjustments?
- A: It depends on the adjustments and what the board/owners would like to see. Perhaps you start with the latest year and record the entries as of the end of that year. There are a couple of methods. You can also record the adjustments to the balance sheet accounts now and record the income/expense adjustments to retained earnings/equity/fund accounts.
- Q: Are credit cards recommended? What additional documentation should you have?
- A: Credit cards are a potential area for misuse. Establish strong controls, meaning low limits, and written authorization before spending if possible. Require receipts & invoices. Do at least monthly reconciliation of statements to supporting documents with explanations. Have control over physical access to the cards.
- Q: What are the allowable expense deductions on Form 1120-H?
- A: Typically deductions to offset interest income include tax preparation fee, fidelity insurance premium, percentage of management/accounting fees.
- Q: Rather than arbitrarily increasing fees every year we use "Zero-Based Budgeting" and let costs drive fees. Is this OK?
- A: The costs should drive the budget, so you have the right priorities. This method likely takes more work (time) than adjusting based on the prior year, but it should achieve a good result.

- Q: Our association does not have a late fee for delinquent monthly assessments. Do most associations have a late fee? Is it recommended?
- A: Most associations have late fees. Humans need incentives! Consult with your attorney to establish a reasonable policy that can be equally enforced, that maximizes the desired behavior (everyone paying on time!).
- Q: Has Mr. Newman assisted with a PPP loan for a coop HOA?
- A: We have not.
- Q: In Florida there is pending legislation to allow Board more Reserve Fund investment options. Any comments on doing this?
- A: While a wider array of Reserve investment options (stocks, etc.) has not been specifically illegal, it has always been discouraged. The new legislation proposes that such investment options are allowable if done under the oversight of a qualified financial advisor and in accordance with the Reserve Study. Remember, just because something is legal doesn't mean it is wise. You're dealing with Other People's Money (OPM) here, so a conservative strategy is wise.
- Q: Would appreciate more discussion of "typical findings". Jeremy didn't cover that material (all the bullet points) in any depth.
- A: Documentation of board discussions and decisions bad debts, loans, special assessments, cash flow, expense authorizations. Interfund balances were not addressed. There is a long list, but inadequate time to discuss in this time-limited forum (which was not expected to be exhaustive!).
- Q: How much allowance for bad debt do we need if our collections company has historically collected all balances owed?
- A: An allowance may not be needed. It depends on each delinquent account and the likelihood of recovery.
- Q: I'm having a difficult time following the audit report as it pertains to reserves using the new revenue rules. Do you have any tips for understanding this?
- A: Effectively the reserves fund account was replaced with Contract Liabilities (CL), which is effectively a deferred reserves assessments/revenue account. The CL

account will increase for reserves not recognized and decrease as reserves expenses are incurred and thus reserves assessments revenue is recognized.

- Q: What do you think about the accounting standard change to no longer include reserve account as part of HOA total assets?
- A: The reserve account (bank balances) is always part of assets. Please see my response to the previous question.
- Q: Our bookkeeper is saying that we can't show reserve contributions as an expense on the annual budget. What is the correct answer?
- A: Reserve contributions are not technically an expense; however, they are a debit/reduction on the income statement. They are typically an offset against total assessments.
- Q: What is an average amount of operating cash to keep in the account, and what is recommended?
- A: CAI recommends three months of operating fund expenses. Being aware of your cash needs is important. If you have low delinquencies you may not need three months of cash.
- Q: Isn't operating balance best looked at as money in bank account less pre-paid dues/deferred income?
- A: The operating fund balance is the net of total assets minus total liabilities.
- Q: Should audits be performed every year for a small HOA: 200 houses?
- A: It depends. How close is the board to the numbers? Are there strong internal controls? Does the board review bank reconciliations and other financial reports every month? I think it's a good idea to have a regular audit. As stated in the webinar, it might act as a deterrent <u>and</u> demonstrate the board/management has nothing to hide.

- Q: In the course of an audit, should the management company provide answers to the internal questions the auditor asked of them (such as missing or unclear documents) as well as management responses, if requested by the board?
- A: Yes. Management provides this type of service as they support board and association operations.
- Q: Is there a good-better-best with whether to choose a tax filing option of cash, accrual, or modified accrual?
- A: Not really. It all comes out in the wash over time.
- Q: Does it make sense to have your reserves in a money market account like Morgan Stanley or keep it in a savings account at the bank?
- A: That depends on size of the Reserve Fund and a number of different options (when the funds are needed, interest rates, etc). Concerns about FDIC insurance arise when funds are in excess of \$250k, and it is generally advisable to seek professional assistance when Reserve funds are in excess of \$500k.
- Q: Per FDIC coverage of up to \$250,000.00, should we have several reserves accounts for \$250,000.00 and less?
- A: See above.
- Q: How deep should an auditor look at HOA processes, record keeping and internal controls?
- A: Auditors obtain an understanding of the association's systems and controls. An audit is not designed for the purpose of expressing an opinion on the <u>effectiveness</u> of the internal controls. An Internal control/process engagement would be an additional service.
- Q: What is the advantage of pool funding and who reviews the pool funding?
- A: The Cash Flow Method (sometimes called "pooled") of calculating Reserve contributions is advantageous because it can be used to pursue all three Reserve Funding goals... Full Funding, Threshold Funding, and Baseline Funding. See more here. It is also advantageous because the profile of the multi-yr Funding Plan can be set so it does not penalize "near term owners" as is typical with the Component Method (sometimes called "straight line"). See more here. The choice which to use is

typically made by the Reserve Study professional. The body of people reviewing Reserve funding is the board of directors as they manage Reserve income and expenses throughout the year.

- Q: Do most associations use cash or accrual basis? Which do you recommend?
- A: Most use modified accrual (revenues when billed/earned; expenses when paid). I recommend full accrual if possible.
- Q: Who must approve/ratify budget? Just the Board?
- A: Depends on state statute.
- Q: The management company refused to provide about 1/2 of monthly financial statements over a two-year period. What action do you recommend?
- A: Look for a new management company!
- Q: Can you speak regarding ASC 606? I feel most Associations are going to have a heart attack seeing their reserve balance booked as a liability.
- A: Consider the liability account to be deferred reserves assessments income. Hopefully that helps.
- Q: My association votes annually on a resolution to apply excess income to future membership assessments at the Feb annual meeting for the year to end in 10 months. Shouldn't this vote be taken after the year is over and the amount of the surplus is known? I think the question should be in reference to the completed year rather than the incomplete year. If we are asked to approve the use of a surplus, shouldn't we equally be agreeing to be assessed for a deficit?
- A: Typically the vote does occur before the year end. It can occur after the year end as well, but before the tax filing requirements. The vote is for tax purposes (form 1120); it is not designed to address additional assessments if there is a deficit.
- Q: What matters should be covered in the engagement letter?
- A: The engagement letter sets out the terms of the engagements: responsibilities of auditor and management/board, fee, and who is in charge of the engagement.

- Q: Are Audits in Washington required for condos under the Horizontal Regime Act, with 50 units or less, if Board waives the audit?
- A: 60% of owners must vote to waive an audit in this situation.
- Q: What is the criteria to use unbudgeted reserve funds emergency only or opportunities? For example, insurance paid for a partial hallway recarpet, association wants to replace the rest of the carpet now so it ages at the same time. Carpet replacement was unbudgeted.
- A: There is no prohibition from spending Reserve funds "early". Reserve expenses are all fundamentally based on estimates, both in size and timing. Consult your Reserve Study professional for questions such as this one, but it is likely that their answer will be to replace the rest of your carpet with Reserves and update your Reserve Study to show all carpet in (near) new condition.
- Q: What if Reserve project cost exceeds original amount approved in budget?
- A: As in the above question, Reserve expenses are all estimates. Even if the cost is not a close match, spend the Reserve Funds and adjust the Reserve Study in the next update with a revised expectation for future expenses. A Reserve Study should continue to be more closely "tuned" to the needs, costs, and timing of the association as the years pass and more Reserve Study updates are completed.
- Q: If there was ever a suspicion of fraud, how do you start the investigative process?
- A: Gain an understanding of the concerns. Who is involved? What areas are subject to the alleged fraud?
- Q: The HOA I live in has a budget of \$5 million each year. What type of audit would you do, how extensive?
- A: There is only one type of audit unless you perform a forensic audit.
- Q: What would you say is the average 60-day delinquency percentage? What percentage is considered healthy? Less than 10%? 5%?
- A: In a healthy economic environment, most associations have 60-day delinquencies below 5%. "Close to zero" should always be your goal. In the last year, with higher unemployment nationwide, many associations crept above the 5% line.

- Q: We're a small association of 17 townhouses and 2 owners (not board members) are CPAs. Could we use them as our tax preparer and/or auditor?
- A: They could prepare the tax returns. The perception of independence impacts whether a CPA who lives in an association can perform an audit for the association. I would say that they probably should not perform a GAAS audit for the association, as they would likely not be perceived as independent.
- Q: What is a safe way to pay dues online with confidential tracking and reporting?
- A: There are many services provided by banks and specialty dues processing companies.
- Q: We had a previous Board that did not even report one bank account for a whole year, while doing transactions with it. It took a new Board in place to discover this. How do we prevent things like this from happening again... accounts that are NOT reported at all?
- A: Obtain bank statements for every account for every month of the year. If you see outgoing funds, identify exactly what the funds are for. Somehow money was deposited into the unidentified bank account. Control how incoming funds are processed and make sure you know where all outgoing funds are going. Follow the money trail!
- Q: We are a large scale community that currently does a full audit one year and a review the next. What are your thoughts on that approach?
- A: I think that's ok if you have strong controls, review the financials and supporting documentation monthly, and the audit does not identify significant weaknesses or concerns, or contain large amounts of accounting adjustments.
- Q: When you have a Capital improvement project that was started but not completed and the money does not carryover and is just added to general funds... is this an item that would show up in an audit?
- A: Tracking this type of activity is not always as transparent as it should be. I would hope an audit would be able to determine sources and uses of funds, together with other documentation to be able to identify the change in use of the project funds. I recommend a separate bank account and fund for such projects. Don't comingle the money with other funds.

- Q: What can happen when you over assess year over year, creating excess income? Is this a tax issue?
- A: Typically, only if you want to file federal form 1120.

Q: How many months cash reserve is suggested?

A: There is no such figure of merit, as the swing is large. The cash in Reserve grows in the years preceding a large project and falls dramatically the year after that large project. So there is no ongoing, steady figure of merit. What you are searching for is how well the Reserve cash balance compares to the association's Fully Funded Balance (FFB), which is the dollar value of deterioration. The FFB grows and shrinks over the years, as does the Reserve cash balance. This comparison is called the association's "Percent Funded" and is very revealing. A Percent Funded of 0-30% is weak (high risk of special assessment, 30-70% is Fair, and over 70% is strong). See more here.

Q: If an asset lasts more than 30 years, how do you account for it on the reserve study? For example, stone/rock monuments and walls

- A: If your Reserve Study bases the Funding Plan on the Percent Funded metric, there is no limiting "window of opportunity" to consider. All growing obligations, even those in excess of what is displayed in the report, are factored into Reserve contribution and Reserve balance calculations. If your Reserve contributions are calculated on a strictly cash basis, there are modifications that can be made to artificially "partly fund" those long-life components (such as creating a phantom fractional "expense" near the end of the 30-yr "window of opportunity").
- Q: Two months of monthly financials were not prepared, thus not presented to the board. Two years later, the annual audit was done (over a year past due) and noted this. When the accounting for the missing two periods were inquired of, the response was, "They've already been provided." The board president and majority of the board are not concerned. What is the board's fiduciary responsibility in a situation like this? -- Concerned board member (state of CA)
- A: I would be concerned that for two months no one on the board knows what happened. There may be some ways to mitigate concerns, but missing records are a concern.

- Q: If a community manager or management company prepares a reserve study summary for an association, should the name of the preparer be disclosed on the summary (e.g. the name of the manager, management company, accountant, or board member)?
- A: Yes. There should always be accountability, so the reader can know the source of the information, and the credibility of the provider (whether independent or not, and whether credentialed or not).
- Q: Is it proper for a board member to instruct the reserve study company what estimate to use in the reserve study report -- when it is purely an estimate that a board member obtained on his own and is not an actual cost of maintenance work performed in the past?
- A: Most Reserve Study companies welcome client input. But it is our name/logo on the cover of the report and our credential (Reserve Specialist seal) on the cover, so we have to be comfortable with any estimate appearing in the report. If we are given a "suggestion", great! But that suggestion still needs to be validated. if any independent, credentialed Reserve professional believes a board-sourced estimate to be inappropriate, it should not appear in the report.
- Q: Our manager redacted (deleted) delinquent board member names from several delinquency reports. Although it was requested for unaltered reports to be submitted to the board (and requested that no such alterations be done with any financial reports), the unaltered reports were not presented to the board. What is the fiduciary and ethical duty of the board and manager?
- A: This is more of a legal question.
- Q: When delinquencies were high, the board reduced late fees by a few dollars to below 10% by restating the (operating) rules and regulations. At the time, there were two to three regularly or chronically delinquent board members. The board did not want HOA legal counsel to review or inform of the proposed restated rules. Should the delinquent board members have recused themselves for the vote to reduce the late fees (reduced by over 20%)?
- A: Yes! Board members should recuse themselves from any actions in which they are personally involved.

- Q: After a request of minutes (and other records such as contracts) and years of putting off as low priority, no approved minutes have been kept and executed contracts may be missing. This is despite the board spending time at every meeting making corrections (missing motions, unclear language, incorrect dates and board titles) and major repair contracts being approved. Do audits/auditors review meeting minutes and contracts approved during the fiscal year? Should the auditor be made aware that association records are in disarray?
- A: Yes please let the auditor know if you believe records are in disarray. Minutes <u>are</u> reviewed in an audit.
- Q: Should an association show an expense on monthly Profit and Loss statements equal to that month's uncollected assessments in order to give a more accurate picture of the association's interim financial condition? Similarly, should there be a monthly entry for collected past due payments?
- A: Updating the allowance for doubtful accounts (balance sheet) each month will have an offsetting entry for the income statement that will address bad debt/recovery.
- Q: If our budget shows an amount for interest income, how is that handled at year end? Meaning are adjustments made in the audit?
- A: No adjustments would be made at year end related to budgeted interest income. Only actual results appear.
- Q: When there's a change in management, should the association have a forensic audit done, or a regular audit?
- A: It depends on the condition of the records and the board's identification of any issues with previous management. A forensic audit is not usually needed.
- Q: Short of a full audit, is a CPA <u>review</u> of the past calendar year usually effective?
- A: It depends what you are looking for. A review is definitely less significant in scope than an audit and would not be as effective.
- Q: May capital improvements under 5% of the budget be a line item in the budget? So the Board may plan improvements? Or may they have a larger capital improvement line?
- A: This question is likely state-based. See your legal counsel.

- Q: We have a Board that regularly pays vendors, then asks for reimbursement. What tax/financial issues can arise from this practice?
- A: If the expenses are bona fide and for the association and reimbursements match the expenses, there should not be any tax issues. I recommend not having board members pay and receive reimbursements from a cost control, alleged fraud viewpoint. I do not recommend that board members get involved in this way. The manager/management company should arrange expenditure and payments.
- Q: If a recent board member realizes the year-end financials are not correct, should they address the auditor directly--if the current board is not aware or refuses to address?
- A: This question has a legal aspect to it. Perhaps raising the issue in an open board meeting would be a place to start. Failing that, direct discussion with the auditor may be necessary. Please be careful to not get in any legal difficulties yourself, though!
- Q: How do I manage to get my board to agree to a monthly increase when they have an idea that exceeding \$500/month will reduce their ability to sell? We are currently 14 units at \$495 per month. As treasurer, I see we are reaching a dangerous level of cash and reserves. Even \$5 or \$10 is too much for them because of their perception that exceeding \$500 per month is too much?
- A: That threshold is artificial. It the board's <u>job</u> to collect what is needed to sustain the association. Owners will soon find that artificial limits on the association's income that result in unsightly and expensive deferred maintenance or special assessments. Either of those will reduce both sales price and the attractiveness of the unit to prospective buyers. Who would want to buy into a struggling association when they can buy into a thriving association (with homeowner assessments just a few dollars higher).
- Q: What disclosures are required to Association members?
- A: Those are Governing Document-based and State-based.
- Q: We have a zero-dues increase board member. How do we argue against this approach?
- A: No problem. Out vote that person and move on.

- Q: How much does a full audit cost? Range?
- A: There is a very wide range depending on the scope of the audit, size and complexity of association. Please contact your local auditor/CPA for an estimate for your association.
- Q: When an auditor recommends an adjustment for uncollectible assessments, does that amount need to actually written off from specific delinquent homeowners?
- A: No not unless the board has exhausted all collection efforts and determines there are no more remedies.









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Fraud Prevention

Remove Opportunities

- · Segregate duties
- Pre-authorize transactions
- Review transactions
- Spending Limits
- Limit credit/debit/store cards
- Limit online purchases
- · No cash!

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Fraud Prevention

Review your Documents

- Monthly Financial Statements
- Balance Sheet, Income and Expense (P&L)
 Bank Statements (obtain independently)
- Bank Reconciliations
- Delinquencies

Don't miss the obvious - See Something, Say Something!





Know your Reports

Four Major Reports

- Balance Sheet
- Income/Expenses (compare to Budget)
- Bank Reconciliation
- Delinquency Report
 What's the trend?
 What is the status?
 Write-off candidates

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Know your Reports

Learn:

- Are Delinquencies growing/shrinking?
- Is Operating Cash suitable (x months of assessments), and is it growing or shrinking?
- Are we over (or under) spending?
- Are we paying, or ready to pay, all bills (including Reserve contributions)?

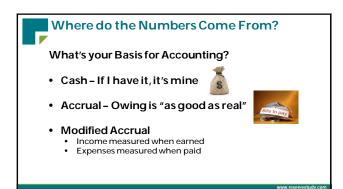






















What are my Choices?

- Audit
 Obtain evidence, confirm balances, figures, and procedures to express opinion on financial statements as a whole. Requires significant documentation to understand what happened, when, and why.
- Review
 Make inquiries about figures and procedures (limited assurance)
- Compilation
 - $\bullet \quad \hbox{\tt Cursory evaluation, assisting management in presentation or format}$

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When is an Audit Required?

- Governing Documents
- Different State Requirements
 - CA and OR Review requirements

 - WA <u>Audit</u> requirement
 AZ <u>Compilation</u> is acceptable

 $Note: higher \, requirements \, trump \, lower \, requirements$

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What is an Audit?

- Procedures performed to confirm amounts and disclosures

 - Learn what needs to be adjusted, and make those changes
 Receive an independent opinion "Now Everything's fine!" (an "unqualified opinion")





What are typical Adjustments?

- To be presented using Accrual Basis accounting
 Resolve with prior year
 Allowance for bad debt

- Prepaid income
- Prepaid expenses
- Accrued expenses

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What are typical Findings?

- No authorization of Reserve expenses (in board minutes) No review of "per use" fees Budget not approved or ratified No documentation for transfers/loans from funds

- No documentation for delinquencies or writeoffs
 No documentation for special assessments or debt service
- Reserves funding not per budget

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What affects the cost?

- Management company transition
 Record integrity
 Available, organized, reconciled
 Expenses documented, consistent with budget
- Special Assessments, Loans, Litigation
- - Incomplete records, delayed or partial communication...



How to Prepare?



- Monthly Financials (1 yr) Bank statements & reconciliations (1 yr) Aged receivables & prepaid assessments

- General ledger Vendor invoices
- Check register Latest Reserve Study Board Minutes

- Governing Documents
 Loan or Special Assessment agreements, statements, records

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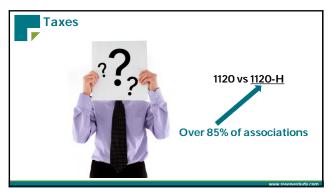


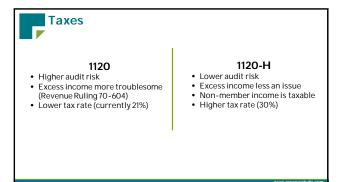
How to Minimize Cost?

- Start early Clean and complete records
- Reconciliations
- Documents ready and available Supporting documentation for all numbers
- Quick and complete responses to questions

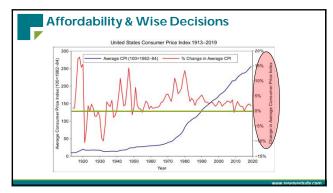
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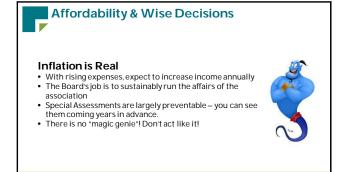


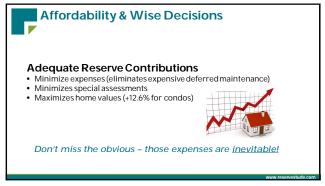


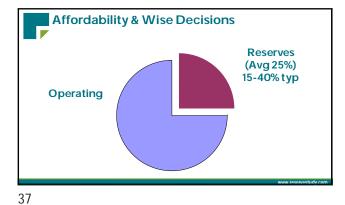












Whether looking backwards (CPA) ... or planning ahead (Reserve Study Professional)

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