Parma Public Housing Agency Financial Statements For the Year Ended December 31, 2004



City Council, City of Parma Parma Public Housing Authority 5983 W. 54th Street, Room 124 Parma, Ohio 44159

We have reviewed the *Independent Auditor's Report* of the Parma Public Housing Authority, Cuyahoga County, prepared by Salvatore Consiglio, CPA, Inc., for the audit period January 1, 2004 to December 31, 2004. Based upon this review, we have accepted these reports in lieu of the audit required by Section 117.11, Revised Code. The Auditor of State did not audit the accompanying financial statements and, accordingly, we are unable to express, and do not express an opinion on them.

Our review was made in reference to the applicable sections of legislative criteria, as reflected by the Ohio Constitution, and the Revised Code, policies, procedures and guidelines of the Auditor of State, regulations and grant requirements. The Parma Public Housing Authority is responsible for compliance with these laws and regulations.

Betty Montgomery

BETTY MONTGOMERY Auditor of State

August 30, 2005



Parma Public Housing Agency

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Independent Auditors' Report

To The City Council City of Parma, Ohio Regional Inspector General of Audit Department of Housing and Urban Development

I have audited the accompanying Financial Statements of the Department of Parma Public Housing, City of Parma, Ohio, as of and for the year ended December 31, 2004 as listed in the table of contents. These Financial Statements are the responsibility of the City of Parma, Ohio, and management. My responsibility is to express an opinion on these Financial Statements based on my audit.

I conducted my audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing standards*, issued by the Comptroller General of the United States. Those standards require that I 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. I believe that my audit provides a reasonable basis for my opinion.

As discussed in Note 1, the Financial Statements of the Department of Parma Public Housing, City of Parma, Ohio, are intended to present the financial position and result of operations and cash flows of proprietary fund types of only that portion of the financial reporting entity of the City of Parma, Ohio, that is attributable to the transactions of the Department.

In my opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Department of Parma Public Housing, City of Parma, Ohio, as of December 31, 2004, and the results of its operations and the cash flows of its proprietary fund for the year then ended in conformity with accounting principles generally accepted in the United State of America.

In accordance with *Government Auditing Standards*, I have also issued a report dated March 31, 2005, on my consideration of Department of Parma Public Housing, City of Parma, Ohio's internal control over financial reporting and my tests of its compliance with certain provisions of laws, regulations, contracts and grants. That report is an integral part of an audit performed in accordance with Government Auditing Standards and should be read in conjunction with this report in considering the result of our audit.

The Management's Discussion and Analysis is not a required part of the basic financial statements but is supplementary information required by the Governmental Accounting Standards Board. I have applied certain limited procedures, which consisted principally of inquiry of management regarding the methods of measurement and presentation of the supplementary information. However, I did not audit the information and express no opinion thereon.

My Audit was performed for the purpose of forming and opinion on the Financial Statements taken as a whole. The schedules listed in the table of contents are presented for purposes of additional analysis and are not a required part of the Financial Statements of the Department of Parma Public Housing, City of Parma, Ohio. The accompanying Schedule of Federal Awards Expenditures is presented for purposes of additional analysis as required by U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Government and Non-Profit Organizations* and is not a required part of the Financial Statements. The combining financial data ("FDS") schedule is presented for purposes additional analysis as required by the Department of Housing and Urban Development and is not a required part of the Financial Statements. Such information has been subjected to the auditing procedures applied in the audit of the basic Financial Statements and, in my opinion, is fairly presented in all material respect in relation to the basic Financial Statements taken as a whole.

salvatore Consiglio

Salvatore Consiglio, CPA, Inc.

March 31, 2005

MANAGEMENT'S DISCUSSION AND ANALYSIS (MD&A) Year Ended December 31, 2004

Unaudited

The Parma Public Housing Agency ("the Agency") management's discussion and analysis is designed to (a) assist the reader in focusing on significant financial issues, (b) provide an overview of the Authority's financial activity, (c) identify changes in the Authority's financial position, and (d) identify individual fund issues or concerns.

Since the Management's Discussion and Analysis (MD&A) is designed to focus on the current years activities, resulting changes and currently known facts, please read it in conjunction with the Authority's financial statements (beginning on page 13).

FINANCIAL HIGHLIGHTS

- The Agency's net assets decreased by \$38 thousand (or 2.0 %) during 2004, including Results from Operations of \$46 thousand loss, plus Prior Year Adjustments of \$8 thousand. Since the Agency engages only in business-type activities, the increase is all in the category of business-type net assets. Net Assets were \$2431 thousand and \$2393 thousand for 2003 and 2004 respectively.
- Revenues increased by \$627 thousand (or 16.0%) during 2004, and were \$4083 thousand and \$4710 thousand for 2003 and 2004 respectively. The Agency also recovered \$130,869 from a former embezzlement which is recorded under Special Items.
- The total expenses of all Agency programs increased by \$626 thousand (or 15.0%). Total expenses were \$4,261 thousand and \$4,887 Thousand for 2003 and 2004 respectively.

MANAGEMENT'S DISCUSSION AND ANALYSIS (MD&A) Year Ended December 31, 2004

Unaudited

USING THIS ANNUAL REPORT

The Report includes three major sections, the "Management's Discussion and Analysis (MD&A)", "Basic Financial Statements", and "Other Required Supplementary Information":

MD&A

~ Management's Discussion and Analysis ~

Basic Financial Statements

~ Authority-wide Financial Statements – pgs 13-15 ~

Other Required Supplementary Information

~ Required Supplementary Information - pg 22-26~ (other than the MD&A)

The primary focus of the Agency's financial statements is on both the Agency as a whole (Agencywide) and the major individual funds. Both perspectives (agency-wide and major fund) allow the user to address relevant questions, broaden a basis for comparison (year to year or Agency to Agency) and enhance the Agency's accountability.

MANAGEMENT'S DISCUSSION AND ANALYSIS (MD&A) Year Ended December 31, 2004

Unaudited

Agency-Wide Financial Statements

The Agency-wide financial statements (see pgs 13-15) are designed to be corporate-like in that all business type activities are consolidated into columns which add to a total for the entire Authority.

These Statements include a Statement of Net Assets, which is similar to a Balance Sheet. The Statement of Net Assets reports all financial and capital resources for the Authority. The statement is presented in the format where assets, minus liabilities, equal "Net Assets", formerly known as equity. Assets and liabilities are presented in order of liquidity, and are classified as "Current" (convertible into cash within one year), and "Non-current".

The focus of the Statement of Net Assets (the "Unrestricted Net Assets") is designed represent the net available liquid (non-capital) assets, net of liabilities, for the entire Authority. Net Assets (formerly equity) are reported in three broad categories:

Net Assets, Invested in Capital Assets, Net of Related Debt: This component of Net Assets consists of all Capital Assets, reduced by the outstanding balances of any bonds, mortgages, notes or other borrowings that are attributable to the acquisition, construction, or improvement of those assets.

Restricted Net Assets: This component of Net Assets consists of restricted assets, when constraints are placed on the asset by creditors (such as debt covenants), grantors, contributors, laws, regulations, etc.

Unrestricted Net Assets: Consists of Net Assets that do not meet the definition of "Net Assets Invested in Capital Assets, Net of Related Debt", or "Restricted Net Assets".

The Agency-wide financial statements also include a Statement of Revenues, Expenses and Changes in Fund Net Assets (similar to an Income Statement). This Statement includes Operating Revenues, such as rental income, Operating Expenses, such as administrative, utilities, and maintenance, and depreciation, and Non-Operating Revenue and Expenses, such as capital grant revenue, investment income and interest expense.

The focus of the Statement of Revenues, Expenses and Changes in Fund Net Assets is the "Change in Net Assets", which is similar to Net Income or Loss.

Finally, a Statement of Cash Flows is included, which discloses net cash provided by, or used for operating activities, non-capital financing activities, and from capital and related financing activities.

MANAGEMENT'S DISCUSSION AND ANALYSIS (MD&A) Voor Ended December 31, 2004

Year Ended December 31, 2004

Unaudited

Fund Financial Statements

The Agency consists of exclusively Enterprise Funds. Enterprise funds utilize the full accrual basis of accounting. The Enterprise method of accounting is similar to accounting utilized by the private sector accounting.

Many of the programs maintained by the Authority are required by the Department of Housing and Urban Development. Others are segregated to enhance accountability and control.

The Agency's Programs

Business Type Funds

Conventional Public Housing – Under the Conventional Public Housing Program, the Authority rents units that it owns to low-income households. The Conventional Public Housing Program is operated under an Annual Contributions Contract (ACC) with HUD, and HUD provides Operating Subsidy and Capital Grant funding to enable the PHA to provide the housing at a rent that is based upon 30% of household income. The Conventional Public Housing Program also includes the Capital Fund Program, which is the primary funding source for physical and management improvements to the Authority's properties.

<u>Housing Choice Voucher Program</u> – Under the Housing Choice Voucher Program, the Authority administers contracts with independent landlords that own the property. The Authority subsidizes the family's rent through a Housing Assistance Payment made to the landlord. The program is administered under and Annual Contributions Contract (ACC) with HUD. HUD provides Annual Contributions Funding to enable the Authority to structure a lease that sets the participants' rent at 30% of household income.

Other Non-major Funds – The agency had no other Non-major Funds during 2004.

AGENCY-WIDE STATEMENTS

Statement of Net Assets

The following table reflects the condensed Statement of Net Assets compared to prior year. The Authority is engaged only in Business-Type Activities.

MANAGEMENT'S DISCUSSION AND ANALYSIS (MD&A) Year Ended December 31, 2004

Unaudited

TABLE 1

STATEMENT OF NET ASSETS

	2004 (in thousands of dollars)	Restated 2003 (in thousands of dollars)
Current and Other Assets	\$ 357	\$ 521
Capital Assets	2165	2160
Total Assets	\$2,522	\$2,651
Current Liabilities	\$116	\$233
Long-Term Liabilities	13	18_
Total Liabilities	\$129	\$251
Net Assets:		
Invested in Capital Assets,		
Net of Related Debt	\$2,165	\$2,160
Restricted	23	- 0 -
Unrestricted	205	270_
Total Net Assets	\$2,393	\$2,430

Note: The 2003 current assets and current liabilities were restated to eliminate the interprogram due to/from to be consistent with 2004 reporting.

Major Factors Affecting the Statement of Net Assets

During 2004, current and other assets were decreased by \$164 thousand, and current liabilities were decreased by \$117 thousand. The current and other assets, primarily cash and investments, decreased because of change in receivables from HUD. Current liabilities decreased because of change in payables to other governments.

Capital assets did not change significantly, increasing from \$2,160 thousand to \$2,165 thousand. The \$5 thousand increase may be attributed primarily to increase in Leasehold Improvements (\$105 thousand) less current year depreciation and amortization (\$115 thousand) plus small purchases in equipment (\$17) less disposal of assets (\$13). For more detail see "Capital Assets and Debt Administration" below.

MANAGEMENT'S DISCUSSION AND ANALYSIS (MD&A)

Year Ended December 31, 2004

Unaudited

TABLE 2

CHANGE OF UNRESTRICTED NET ASSETS

Table 2 presents details on the change in Unrestricted Net Assets

	Thousands of Dollars
Unrestricted Net Assets 12/31/03	\$270
Results of Operations Adjustments:	(46)
Depreciation (1) Gain from sale of assets	115 3
Capital Expenditures (2) Transfer to Restricted Net Assets Prior Year Adjustments	(122) (23) 8
Unrestricted Net Assets 12/31/04	\$205

- (1) Depreciation is treated as an expense and reduces the results of operations but does not have an impact on Unrestricted Net Assets
- (2) Capital expenditures represent an outflow of unrestricted net assets, but are not treated as an expense against Results of Operations, and therefore must be deducted
- (3) Twenty three thousand of Results Restricted Net Assets is restricted for Capital Expenditures and is a result of monies recovered from a prior embezzlement.

While the results of operations are a significant measure of the Authority's activities, the analysis of the changes in Unrestricted Net Assets provides a clearer change in financial well-being.

MANAGEMENT'S DISCUSSION AND ANALYSIS (MD&A) Year Ended December 31, 2004

Unaudited

TABLE 3

STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET ASSETS

The following schedule compares the revenues and expenses for the current and previous fiscal year. The Authority is engaged only in Business-Type Activities.

	2004 (thousands of dollars)	2003 (thousands of dollars)
Revenues		
Tenant Revenue – Rents and Other	\$ 100	\$109
Operating Subsidies and Grants	4,595	3,960
Capital Grants	0	0
Investment Income	3	5
Other Revenues	12	9
Special Items	131	0
Total Revenue	4,841	4,083
Expenses		
Administrative	601	570
Tenant Services	0	0
Utilities	81	70
Maintenance	63	139
Protective Services	1	2
General	27	39
Housing Assistance Payments	3,999	3,329
Depreciation	115	112
Total Expenses	4,887	4,261
Net Increase	\$ (46)	\$ (178)

MAJOR FACTORS AFFECTING THE STATEMENT OF REVENUE, EXPENSES AND CHANGES IN NET ASSETS

Tenant revenue was down during 2004 in comparison to 2003. The decrease was due primarily to decreases in tenant income. Operating Subsidies and Grants increased. The increase was due primarily to an increase in Section 8 Vouchers. Additionally, \$131 thousand was recovered from a previous embezzlement. Per HUD's instructions, \$108 thousand was spent as Capital Funds and \$23 thousand restricted for future capital expenditures.

MANAGEMENT'S DISCUSSION AND ANALYSIS (MD&A) Year Ended December 31, 2004

Unaudited

Most expenses increased moderately due to inflation, except for Maintenance and Outside Management Fees. Maintenance costs decreased due to Capital expenditures and Outside Management Fees decreased due to training of agency personnel. Housing Assistance Payments increased due to additional rent up of 202 units of opt out received in 2003. In addition, the Agency rented units to more low income households, which increased Housing Assistance Payments as well as the associated HUD revenue. Utility cost increased due to increased rates charged by local utility companies. Compensated Absences expenses are higher because of a reduction taken in 2003.

CAPITAL ASSETS AND DEBT ADMINISTRATION

Capital Assets

As of year end, the Agency had \$2165 thousand invested in a variety of capital assets as reflected in the following schedule, which represents a net increase (addition, deductions and depreciation) of \$5 thousand or 1% from the end of last year.

TABLE 4

CAPITAL ASSETS AT YEAR-END (NET OF DEPRECIATION)

Pusinoss typo

	Activities	
	2004 (thousands of dollars)	2003 (thousands of dollars)
Land and land rights Buildings & Leasehold Improvmt	\$ 13 2.525	\$ 13 3,431
Equipment – Administrative	3,535 89	3,431
Equipment – Dwelling	38	38
Accumulated Depreciation	(1,510)	(1,406)
Total	\$2165	\$2160

The following reconciliation summarizes the change in Capital Assets.

MANAGEMENT'S DISCUSSION AND ANALYSIS (MD&A) Year Ended December 31, 2004

Unaudited

TABLE 5

CHANGE IN CAPITAL ASSETS (IN THOUSANDS)

	Business Type Activities
Beginning Balance	\$2,160
Additions, Net of Retirements	120
Depreciation and Amortization	(115)
Ending Balance	\$2,165

Major capital expenditures during 2004 were \$105,000 for complete roof replacement and a small amount of equipment purchases less disposal of an automobile.

Debt Outstanding

As of year-end, the Agency had no debt (bonds, Notes, etc.) outstanding.

TABLE 6

OUTSTANDING DEBT, AT YEAR-END (IN THOUSANDS)

	Tot	Totals	
	2004	2003	
Business Type			
Energy Program Capital Improvements	\$ 0 0	\$ 0 0	
Total	\$ 0	\$ 0	

MANAGEMENT'S DISCUSSION AND ANALYSIS (MD&A)

Year Ended December 31, 2004

Unaudited

ECONOMIC FACTORS

Significant economic factors affecting the Authority are as follows:

- Federal funding provided by Congress to the Department of Housing and Urban Development
- Local labor supply and demand, which can affect salary and wage rates
- Local inflationary, recessionary and employment trends, which can affect resident incomes and therefore the amount of rental income
- Inflationary pressure on utility rates, supplies and other costs

FINANCIAL CONTACT

The individual to be contacted regarding this report is Lev Kulchytsky, Executive Director of the Parma Public Housing Agency, at (440) 885-8157. Specific requests may be submitted to the Parma Public Housing Agency, 5983 W. 54th St., Parma, OH 44129.

Statement of Net Assets Proprietary Fund Type December 31, 2004

ASSE1	S
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Current assets	
Cash and cash equivalents	\$327,569
Receivables, net	29,038
Total current assets	356,607
Non-compart coasts	
Noncurrent assets	
Capital assets: Land	12.000
	13,000
Building and equipment	3,662,847
Less accumulated depreciation	(1,510,758)
Capital assets, net Total assets	2,165,089 \$2,521,696
10(a) 4556(5	φ2,321,030
LIABILITIES	
Current liabilities	
Accounts payable	\$15,470
Accrued liabilities	30,285
Intergovernmental payables	17,064
Tenant security deposits	11,537
Other current liabilities	41,617
Total current liabilities	115,973
Noncurrent liabilities	
Accrued compensated absences non-current	12,630
Total noncurrent liabilities	12,630
Total liabilities	\$128,603
NET ASSETS	
Invested in capital assets, net of related debt	\$2,165,089
Restricted net assets	22,772
Unrestricted net assets	205,232
Total net assets	\$2,393,093

The accompanying notes to the Financial Statements are an integral part of these statements.

Statement of Revenues, Expenses, and Changes in Fund Net Assets Proprietary Fund Type For the Year Ended December 31, 2004

OPERATING REVENUES	
Tenant Revenue	\$100,078
Government operating grants	4,594,591
Other revenue	9,079
Total operating revenues	4,703,748
OPERATING EXPENSES	
Administrative	601,442
Tenant services	100
Utilities	80,328
Maintenance	63,243
Protective services	1,020
General	26,801
Housing assistance payment	3,999,042
Depreciation	114,842
Total operating expenses	4,886,818
Operating income (loss)	(183,070)
NONOPERATING REVENUES (EXPENSES)	
Interest and investment revenue	2,907
Miscellaneous revenue	3,257
Total nonoperating revenues (expenses)	6,164
Income (loss) before contributions and transfers	(176,906)
Special items (gain/loss)	130,869
Change in net assets	(46,037)
Total net assets - beginning	2,430,636
Prior period adjustment	8,494
Total net assets - ending	\$2,393,093

The accompanying notes to the Financial Statements are an integral part of these statements.

Statement of Cash Flows Proprietary Fund Type

For the Year Ended September 30, 2004

CASH FLOWS FROM OPERATING ACTIVITIES	
Operating grants received	\$4,741,255
Tenant revenue received	96,093
Other revenue received	17,229
Interest earned	2,907
Funds recovered from fraud investigation	130,869
General and administrative expenses paid	(890,524)
Housing assistance payments	(3,999,042)
Net cash provided (used) by operating activities	98,787
CASH FLOWS FROM CAPITAL AND RELATED ACTIVITIES	
Proceeds from sale of capital asset	5,872
Property and equipment purchased	(122,409)
Net cash provided (used) by capital and related activities	(116,537)
Net increase (decrease) in cash	(17,750)
Cash and cash equivalents - Beginning of year	345,319
Cash and cash equivalents - End of year	\$327,569
RECONCILIATION OF OPERATING INCOME TO NET CASH	
PROVIDED BY OPERATING ACTIVITIES	
Net Operating Income (Loss)	(\$46,037)
Adjustment to Reconcile Operating Loss to Net Cash Used by Operating Activities	
- Depreciation	114,842
- Gain from sale of capital asset	(3,257)
- (Increases) Decreases in Accounts Receivable	155,817
- Increases (Decreases) in Accounts Payable	7,462
- Increases (Decreases) in Accounts Payable - Intergovermental	(147,388)
- Increases (Decreases) in Accrued Expenses Payable	12,071
- Increases (Decreases) in Other Liabilities	4,389
- Increases (Decreases) in Tenant Security Deposits	888
Net cash provided by operating activities	\$98,787

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Summary of Significant Accounting Policies

The Financial Statements of the Department of Parma Public Housing, City of Parma, Ohio, have been prepared in conformity with generally accepted accounting principles (GAAP) as applied to government units. The Governmental Accounting Standards Board (GASB) is the accepted standard-setting body for establishing governmental accounting and financial reporting principles. The more significant of the Department's accounting policies are described below.

Reporting Entity

The Department of Parma Public Housing, City of Parma, Ohio, was created by the Codified Ordinances of the City of Parma, Chapter 2101, Ordinance 66-85 passed on March 20, 1985. The Department of Parma Public Housing, City of Parma, Ohio, contracts with the United States Department of Housing and Urban Development (HUD) to provide low and moderate income persons with safe and sanitary housing through subsidies provided by HUD. The Department of Parma Public Housing, City of Parma, Ohio, depends on the subsidies from HUD to operate.

The accompanying Financial Statements are intended to present the financial position and result of operations and cash flows of only that portion of the financial reporting entity of the City of Parma, Ohio, that is attributable to the transactions of the Department of the Public Housing Agency. Since the Financial Statements constitute less then a fund, there are no component units as defined in GASB 14 which are included in the Agency reporting entity.

Fund Accounting

The Department of Parma Public Housing, City of Parma, Ohio, uses the proprietary fund to report on its financial position and the results of its operations for the Public Housing Program. Fund accounting is designed to demonstrate legal compliance and to aid financial management by segregating transactions related to certain government functions or activities.

Funds are classified into three categories: governmental, proprietary, and fiduciary. The Department of Parma Public Housing, City of Parma, Ohio, uses the proprietary category for its Public Housing Agency Programs.

Proprietary Fund Types

Proprietary funds are used to account for the Department of Parma Public Housing, City of Parma, Ohio's ongoing activities, which are similar to those found in the private sector. The following is the proprietary fund type:

Enterprise Fund

This fund is used to account for the operations that are financed and operated in a manner similar to private business enterprise where the intent is that the costs (expenses, including depreciation) of providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges or where it has

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES Continued

been decided that periodic determination of revenue earned, expenses incurred, and/or net income is appropriate for capital maintenance, public policy, management control, accountability or other purposes.

Measurement Focus/Basis of Accounting

The proprietary funds are accounted for on the accrual basis of accounting. Revenues are recognized in the period earned and expenses are recognized in the period incurred. Pursuant to GASB Statement No. 20 Accounting and Financial Reporting for Proprietary Funds and Other Governmental Entities that Use Proprietary Fund Accounting the Department of Parma Public Housing, City of Parma, Ohio, follows GASB guidance as applicable to proprietary funds and FASB Statements and Interpretations, Accounting Principles Board Opinions and Accounting Research Bulletins issued on or before November 30, 1989, that do no conflict with or contradict GASB pronouncements.

Investment

Investments are restricted by the provision of HUD Regulations (See Note 2). Investments are valued at market value. Interest income earned in fiscal year 2004 totaled \$2,907.

Capital Assets

Capital assets are stated at cost and depreciation is computed using the straight-line method over an estimated useful life of the assets. The cost of normal maintenance and repairs, that do not add to the value of the asset or materially extend the asset life, are not capitalized.

Cash and Cash Equivalent

For the purpose of the statement of cash flows and cash equivalents include all highly liquid debt instruments with original maturates of three months or less.

Net Assets

Net assets represent the difference between assets and liabilities. Net assets invested in capital assets – net of related debt consists of capital assets, net of accumulated depreciation, reduced by the outstanding balance of any borrowing used for the acquisition, construction or improvement of those assets. Net assets are recorded as restricted when there are limitations imposed on their use by internal or external restrictions

Budgetary Accounting

The Department annually prepares its budget as prescribed by the Department of Housing and Urban Development. This Budget is submitted to the Department of Housing and Urban Development and once approved is adopted by the Board of the Housing Department.

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Estimates

The preparation of Financial Statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect reported amounts of assets and liabilities and disclosures of contingent assets and liabilities at the date of the financial statements, and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates.

Compensated Absences

The Department accounts for compensated absences in accordance with GASB Statement No. 16. Sick leave and other compensated absences with similar characteristics are accrued as a liability based on the sick leave accumulated at the balance sheet date by those employees who currently are eligible to receive termination payments. To calculate the liability, these accumulations are reduced to the maximum amount allowed as a termination payment. All employees who meet the termination policy of the Department for years of service are included in the calculation of the compensated absence accrual amount.

Vacation leave and other compensated absences with similar characteristics are accrued as a liability as the benefits are earned by the employees if both of the following conditions are met: (1) the employees' rights to receive compensation are attributable to services already rendered and are not contingent on a specific event that is outside the control of the employer and employee. (2) It is probable that the employer will compensate the employees for the benefits through paid time off or some other means, such as cash payments at termination or retirement.

In the proprietary fund, the compensated absences are expensed when earned with the amount reported as a fund liability.

2. CASH AND INVESTMENTS

HUD Handbook 7475.1 Chapter 4 Section 1 authorizes the PHA to make investments in:

Direct Obligations of the Federal Government; Obligations of Federal Government Agencies; Securities of Government-Sponsored Agencies; and Demand and Savings Deposits and Certificates of Deposits.

Deposits: The carrying amount of Department of Parma Public Housing, City of Parma, Ohio's totaled \$327,569. This balance includes \$400 of petty cash. The corresponding bank balances totaled \$369,058. Federal Depository insurance covered \$235,623 of the bank balance. The remaining balance of \$133,435 was covered by securities pledged by the Depositories. Department of Parma Public Housing, City of Parma, Ohio, did not have any investments at December 31, 2004.

3. MANAGEMENT STAFF

The management staffs operating the Department of Parma Public Housing are employees of the City of Parma. The Department does not have any employees; the City invoices the Agency for staff payroll and benefits.

4. RISK MANAGMENT

The Department of Parma Public Housing, City of Parma, Ohio, is exposed to various risks of loss related to torts; thefts of, damage to, and destruction of assets; errors and omissions; injuries to employees and natural disasters. During the fiscal year 2004, the Department of Parma Public Housing, City of Parma, Ohio's contracted with the Housing Authority Risk Retention Group, Inc. for liability coverage of \$2,000,000 in aggregate, and \$1,000,000 for each occurrence.

Settled claims have not exceeded this coverage in any of the last three years.

5. CAPITAL ASSETS

The Following is a summary:

Land	\$13,000
Building	3,205,233
Furniture, Equipment & Machinery	127,337
Leasehold Improvements	330,277
Accumulated Depreciation	(1,510,758)
NET CAPITAL ASSETS	\$2,165,089

The Following is a summary of changes:

	Balance			Balance
<u>ASSETS</u>	12/31/03	Additions	Deletions	12/31/04
Land	\$13,000	\$0	\$0	\$13,000
Building	3,205,233	0	0	3,205,233
Furniture, Equipment &				
Machinery	122,797	17,611	13,071	127,337
Leasehold Improvements	225,479	104,798	0	330,277
				_
Total	\$3,566,509	\$122,409	\$13,071	\$3,675,847
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The depreciation expense for the year ended December 31, 2004 was \$114,842.

6: DEFINED BENEFIT PENSION PLANS -PUBLIC EMPLOYEES RETIREMENT SYSTEM

All City employees participate in the Public Employees Retirement System of Ohio (OPERS), a cost sharing multiple employer public employee retirement system administered by the Public Employee Retirement Board. OPERS provide basic retirement and disability benefits, annual cost of living adjustments, and death benefits to plan members and beneficiaries. Chapter 145 of the Ohio Revised Code establishes benefits. OPERS issue a stand-alone financial report, which may be obtained by writing to the Public Employee Retirement System, 277 East Town Street, Columbus, Ohio 43215-4642.

Plan members are required to contribute 8.5 percent of their annual covered salary to fund pension obligations. The employer contribution rate was 13.55 percent of covered payroll. The Agency's required reimbursement to City of Parma for contributions to OPERS for the years ended December 31, 2004, 2003and 2002were \$31,982, \$29,128, and \$27,556, respectively. The full amount has been reimbursed to the City.

7: POSTEMPLOYMENT BENEFITS PUBLIC EMPLOYEES RETIREMENT SYSTEM

The Public Employees Retirement System of Ohio (OPERS) provides post-employment health care benefits to age and service retirants with ten or more years of qualifying Ohio service credit and to primary survivor recipients of such retirants. Health care coverage for disability recipients is also available. The health care coverage provided by the OPERS is considered an Other Post-employment Benefit (OPEB) as described in GASB Statement No. 12. A portion of each employer's contribution to the OPERS is set aside for the funding of post retirement health care. The Ohio Revised Code provides statutory authority requiring public employers to fund post-employment health care through their contributions to the OPERS. The portion of the 2004 employer contribution rate (identified above) that was used to fund health care for the year ended December 31, 2004 was 5.0 percent of covered payroll, which amounted to \$11,801. The significant actuarial assumptions and calculations relating to post-employment health care benefits were based on the OPERS' latest actuarial review performed as of December 31, 2002. An entry age normal actuarial cost method of valuation is used in determining the present value of OPEB. The difference between assumed and actual experience (actuarial gains and losses) becomes part of unfunded actuarial accrued liability. All investments are carried at market value. For actuarial valuation purposes, a smoothed market approach is used. Under this approach assets are adjusted annually to reflect 25 percent of unrealized market appreciation or depreciation on investment assets. The investment assumption

7. POSTEMPLOYMENT BENEFITS PUBLIC EMPLOYEES RETIREMENT SYSTEM (Continued)

rate for 2002 was 8.0 percent. An annual increase of 4.0 percent compounded annually is the base portion of the individual pay increase assumption. This assumes no change in the number of active employees. Additionally, annual pay increases, over and above the 4.0 percent base increase, were assumed to range from 0.50 percent to 6.3 percent. Health care costs were assumed to increase 4.0 percent annually.

Benefits are advanced-funded on an actuarially determined basis. The number of active contributing participants was 364,881. The actuarial value of the OPERS' net assets available for OPEB at December 31, 2002 was \$10.0 billion. The actuarially accrued liability and the unfunded actuarial accrued liability, based on the actuarial cost method used, were \$18.7 billion and \$8.7 billion, respectively.

8. PRIOR PERIOD ADJUSTMENT

The PHA recorded \$8,494 as a prior period adjustment in the Housing Choice Voucher Program. This amount represented funds recovered of defalcation investigation.

9. SCHEDULE OF EXPENDITURE OF FEDERAL AWARD

The accompanying schedule of expenditure of federal award is a summary of the activity of the Authority's federal programs. This schedule has been prepared on the accrual basis of accounting.

PARMA PUBLIC HOUSING AGENCY Schedule of Expenditure of Federal Award For the Year Ended December 31, 2004

FEDERAL GRANTOR / PASS THROUGH GRANTOR PROGRAM TITLES	CFDA NUMBER	EXPENDITURES
U.S. Department of Housing and Urban Development Direct Program		
- Low Rent Public Housing	14.850a	\$170,952
- Housing Choice Vouchers	14.871	4,423,639
Total Expenditure of Federal Award		\$4,594,591

Parma Public Housing Agency Combining Balance Sheet FDS Schedule Submitted To REAC Propriety Fund Type- Enterprise Fund December 31, 2004

	December 3	1, 2004			1
Line Item		Low Rent Public	Housing Choice	Public Housing Capital Fund	
No.	Account Description	Housing	Vouchers	Program	Total
111	Cash - Unrestricted	\$185,398	\$61,091	\$0	\$246,489
112	Cash - Restricted - Modernization and Development	\$22,772	\$0	\$0	\$22,772
113	Cash - Other Restricted	\$0	\$41,617	\$0	\$41,617
114	Cash - Tenant Security Deposits	\$16,691	\$0	\$0	\$16,691
100	Total Cash	\$224,861	\$102,708	\$0	\$327,569
100	10001 00001	Ψ22 1,001	\$102,700	ΨΟ	\$327,309
122	Accounts Receivable - HUD Other Projects	\$0	\$23,918	\$0	\$23,918
126	Accounts Receivable - Tenants - Dwelling Rents	\$7,410	\$0	\$0	\$7,410
126.1	Allowance for Doubtful Accounts - Dwelling Rents	(\$2,326)	\$0	\$0	(\$2,326)
126.2	Allowance for Doubtful Accounts - Other	\$0	\$0	\$0	\$0
128	Fraud Recovery	\$0	\$497	\$0	\$497
128.1	Allowance for Doubtful Accounts - Fraud	\$0	(\$461)	\$0	(\$461)
120	Total Receivables, net of allowances for doubtful accounts	\$5,084	\$23,954	\$0	\$29,038
144	Interprogram Due From	\$1,696	\$214,007	\$0	\$215,703
150	Total Current Assets	\$231,641	\$340,669	\$0 \$0	\$572,310
130	\$22.50.1 \$2.05.00 \$40.7250				Ψ372,310
161	Land	\$13,000	\$0	\$0	\$13,000
162	Buildings	\$3,205,233	\$0	\$0	\$3,205,233
163	Furniture, Equipment & Machinery - Dwellings	\$38,239	\$0	\$0	\$38,239
164	Furniture, Equipment & Machinery - Administration	\$54,302	\$34,796	\$0	\$89,098
165	Leasehold Improvements	\$225,479	\$0	\$104,798	\$330,277
166	Accumulated Depreciation	(\$1,489,146)	(\$18,119)	(\$3,493)	(\$1,510,758)
160	Total Fixed Assets, Net of Accumulated Depreciation	\$2,047,107	\$16,677	\$101,305	\$2,165,089
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180	Total Non-Current Assets	\$2,047,107	\$16,677	\$101,305	\$2,165,089
190	Total Assets	\$2,278,748	\$357,346	\$101,305	\$2,737,399
312	Accounts Payable <= 90 Days	\$9,526	\$5,944	\$0	\$15,470
321	Accrued Wage/Payroll Taxes Payable	\$3,536	\$8,327	\$0	\$11,863
322	Accrued Compensated Absences - Current Portion	\$4,924	\$10,298	\$0	\$15,222
331	Accounts Payable - HUD PHA Programs	\$0	\$249	\$0	\$249
333	Accounts Payable - Other Government	\$9,287	\$7,528	\$0	\$16,815
341	Tenant Security Deposits	\$11,537	\$0	\$0	\$11,537
345	Other Current Liabilities	\$0	\$41,617	\$0	\$41,617
346	Accrued Liabilities - Other	\$0	\$3,200	\$0	\$3,200
347	Interprogram Due To	\$214,007	\$1,696	\$0	\$215,703

Parma Public Housing Agency Combining Balance Sheet FDS Schedule Submitted To REAC Propriety Fund Type- Enterprise Fund December 31, 2004

	December 3	01, 2004			
Line Item No.	Account Description Total Current Liabilities	Low Rent Public Housing \$252,817	Housing Choice Vouchers \$78,859	Public Housing Capital Fund Program \$0	Total \$331,676
310	Total Carrent Liabilities	\$232,017	\$70,037	30	\$331,070
354	Accrued Compensated Absences - Non Current	\$12,630	\$0	\$0	\$12,630
350	Total Noncurrent Liabilities	\$12,630	\$0	\$0	\$12,630
500	TOWN TO CONTROL DAWN DAWN TO CONTROL DAWN TO C	ψ1 2 ,05 0	Ψ.0	Ψ 0	Ψ12,000
300	Total Liabilities	\$265,447	\$78,859	\$0	\$344,306
508.1	Invested in Capital Assets, Net of Related Debt	\$2,047,107	\$16,677	\$101,305	\$2,165,089
511.1	Restricted Net Assets	\$22,772	\$0	\$0	\$22,772
512.1	Unrestricted Net Assets	(\$56,578)	\$261,810	\$0	\$205,232
513	Total Equity/Net Assets	\$2,013,301	\$278,487	\$101,305	\$2,393,093
			·		
600	Total Liabilities and Equity/Net Assets	\$2,278,748	\$357,346	\$101,305	\$2,737,399

Parma Public Housing Agency Combining Statement of Revenue, Expenses and Change in Retained Earnings FDS Schedule Submitted To REAC Propriety Fund Type- Enterprise Fund

December 31, 2004

Line	December 5	Low Rent	Housing	Public Housing Capital	
Item		Public	Choice	Fund	
No.	Account Description	Housing	Vouchers	Program	Total
703	Net Tenant Rental Revenue	\$98,245	\$0	\$0	\$98,245
704	Tenant Revenue - Other	\$1,833	\$0	\$0	\$1,833
705	Total Tenant Revenue	\$100,078	\$0	\$0	\$100,078
706	HUD PHA Operating Grants	\$170,952	\$4,423,639	\$0	\$4,594,591
711	Investment Income - Unrestricted	\$780	\$2,127	\$0	\$2,907
713.1	Cost of Sale of Assets	\$0	\$0	\$0	\$0
714	Fraud Recovery	\$0	\$214	\$0	\$214
715	Other Revenue	\$8,865	\$0	\$0	\$8,865
716	Gain/Loss on Sale of Fixed Assets	\$0	\$3,257	\$0	\$3,257
700	Total Revenue	\$280,675	\$4,429,237	\$0	\$4,709,912
911	Administrative Salaries	\$73,684	\$162,343	\$0	\$236,027
912	Auditing Fees	\$4,878	\$4,878	\$0	\$9,756
913	Outside Management Fees	\$2,361	\$84,601	\$0	\$86,962
914	Compensated Absences	\$3,129	\$22,979	\$0	\$26,108
915	Employee Benefit Contributions - Administrative	\$36,072	\$62,112	\$0	\$98,184
916	Other Operating - Administrative	\$29,810	\$114,595	\$0	\$144,405
924	Tenant Services - Other	\$100	\$0	\$0	\$100
931	Water	\$33,973	\$0	\$0	\$33,973
932	Electricity	\$8,422	\$0	\$0	\$8,422
933	Gas	\$37,933	\$0	\$0	\$37,933
942	Ordinary Maintenance and Operations - Materials and Other	\$8,919	\$0	\$0	\$8,919
943	Ordinary Maintenance and Operations - Contract Costs	\$50,625	\$400	\$3,299	\$54,324
952	Protective Services - Other Contract Costs	\$1,020	\$0	\$0	\$1,020
961	Insurance Premiums	\$23,350	\$3,607	\$0	\$26,957
964	Bad Debt - Tenant Rents	\$340	\$0	\$0	\$340
966	Bad Debt - Other	\$0	(\$496)	\$0	(\$496)
969	Total Operating Expenses	\$314,616	\$455,019	\$3,299	\$772,934
970	Excess Operating Revenue over Operating Expenses	(\$33,941)	\$3,974,218	(\$3,299)	\$3,936,978
973	Housing Assistance Payments	\$0	\$3,999,042	\$0	\$3,999,042
974	Depreciation Expense	\$103,765	\$7,584	\$3,493	\$114,842
900	Total Expenses	\$418,381	\$4,461,645	\$6,792	\$4,886,818
1001	Operating Transfers In	\$0	\$0	\$0	\$0

Parma Public Housing Agency Combining Statement of Revenue, Expenses and Change in Retained Earnings FDS Schedule Submitted To REAC Propriety Fund Type- Enterprise Fund December 31, 2004

		1		Public	
Lina		Low Rent	Hausina	Housing	
Line			Housing	Capital	
Item	4	Public	Choice	Fund	m . 1
No.	Account Description	Housing	Vouchers	Program	Total
1002	Operating Transfers Out	\$0	\$0	\$0	\$0
1008	Special Items (net gain/loss)	\$22,772	\$0	\$108,097	\$130,869
1010	Total Other Financing Sources (Uses)	\$22,772	\$0	\$108,097	\$130,869
	Excess (Deficiency) of Operating Revenue Over				
1000	(Under) Expenses	(\$114,934)	(\$32,408)	\$101,305	(\$46,037)
1103	Beginning Equity	\$2,029,776	\$302,401	\$98,459	\$2,430,636
	Prior Period Adjustments, Equity Transfers and				
1104	Correction of Errors	\$98,459	\$8,494	(\$98,459)	\$8,494
	Ending Equity	\$2,013,301	\$278,487	\$101,305	\$2,393,093
	Maximum Annual Contributions Commitment (Per				
1113	ACC)	\$0	\$4,117,183	\$0	\$4,117,183
	Prorata Maximum Annual Contributions Applicable				
1114	to a Period of less than Twelve Months	\$0	\$0	\$0	\$0
1115	Contingency Reserve, ACC Program Reserve	\$0	\$306,044	\$0	\$306,044
1116	Total Annual Contributions Available	\$0	\$4,423,227	\$0	\$4,423,227
1120	Unit Months Available	708	8,904	0	9,612
1121	Number of Unit Months Leased	677	8,730	0	9,407



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

To The City Council City of Parma, Ohio Regional Inspector General of Audit Department of Housing and Urban Development

I have audited the financial statements of the Department of Parma Public Housing, City of Parma, Ohio, as of and for the year ended December 31, 2004, and have issued my report thereon dated March 31, 2005. I conducted my audit in accordance with auditing standards generally accepted in the United State of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States.

Compliance

As part of obtaining reasonable assurance about whether Department of the Parma Public Housing, City of Parma, Ohio's financial statements are free of material misstatement, I performed tests of its compliance with certain provisions of laws, regulations, contracts, and grants, 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 my audit and, accordingly, I do not express such an opinion. The results of my tests disclosed no instances of noncompliance that are required to be reported under *Government Auditing Standards*.

Internal Control Over Financial Reporting

In planning and performing my audit, Department of the Parma Public Housing, City of Parma, Ohio's internal control over financial reporting in order to determine my auditing procedures for the purpose of expressing my opinion on the basic financial statements and not to provide assurance on the internal control over financial reporting. My consideration of the internal control over financial reporting would not necessarily disclose all matters in the internal control over financial reporting that might be material weaknesses. A material weakness is a condition in which the design or operation of one or more of the internal component does not reduce to a relatively low level the risk that misstatements in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. I noted no matters involving the internal control over financial reporting and its operation that I consider to be material weaknesses.

This report is intended solely for the information and use of the City Council, management, and federal awarding agencies and is not intended to be and should not be used by anyone other that these specified parties.

salvatore Consiglio

Salvatore Consiglio, CPA, Inc.

March 31, 2005



6548 Royalton Road, Suite 104 North Royalton, Ohio 44133 Phone (440) 877-9870 Fax (440) 877-9237 sconsilgio@aol.com

REPORT ON COMPLIANCE WITH REQUIREMENTS APPLICABLE TO EACH MAJOR PROGRAM AND INTERNAL CONTROL OVER COMPLIANCE IN ACCORDANCE WITH OMB CIRCULAR A-133

To The City Council City of Parma, Ohio

Regional Inspector General of Audit Department of Housing and Urban Development

Compliance

I have audited the compliance of the Department of Parma Public Housing, City of Parma, Ohio, with the types of compliance requirements described in the U.S. Office of Management and Budget (OMB) Circular A-133 Compliance Supplement that are applicable to each of its major federal programs for the year ended December 31, 2004. The Department of Parma Public Housing, City of Parma, Ohio major federal programs are identified in the Summary of Auditor's result section of the accompanying Schedule of Findings and Questioned Costs. Compliance with the requirements of laws, regulations, contracts, and grants applicable to each of its major federal programs is the responsibility of the Department of Parma Public Housing, City of Parma, Ohio's management. My responsibility is to express an opinion on the Department of Parma Public Housing, City of Parma, Ohio's compliance based on my audit.

I conducted my audit of compliance 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 OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that I plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Department of Parma Public Housing, City of Parma, Ohio's compliance with those requirements and performing such other procedures as I considered necessary in the circumstances. I believe that my audit provides a reasonable basis for my opinion. My audit does not provide a legal determination on the Department of Parma Public Housing, City of Parma, Ohio's compliance with those requirements.

In my opinion, the Department of Parma Public Housing, City of Parma, Ohio, complied, in all material respects, with the requirements referred to above that are applicable to each of its major federal programs for the year ended December 31, 2004.

Internal Control Over Compliance

The management of the Department of Parma Public Housing, City of Parma, Ohio is responsible for establishing and maintaining effective internal control over compliance with requirements of laws, regulations, contracts, and grants applicable to federal programs. In planning and performing my audit, I considered the Department of Parma Public Housing, City of Parma, Ohio's internal control over compliance with requirements that could have a direct and material effect on a major federal program in order to determine my auditing procedures for the purpose of expressing my opinion on compliance and to test and report on internal control over compliance in accordance with OMB Circular A-133.

My consideration of the internal control over compliance would not necessarily disclose all matters in the internal control that might be material weaknesses. A material weakness is a condition in which the design or operation of one or more of the internal control components does not reduce to a relatively low level the risk that noncompliance with applicable requirements of laws, regulations, contracts and grants that would be material in relation to a major federal program being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. I noted no matters involving the internal control over compliance and its operation that I considered to be material weaknesses.

This report is intended solely for the information and use of the City Council, management, and federal awarding agencies and is not intended to be and should not be used by anyone other that these specified parties.

Jacobson C. Total

Salvatore Consiglio, CPA, Inc.

March 31, 2005

Parma Public Housing Agency Schedule of Findings and Questioned Costs OMB Circular A-133 § .505 December 31, 2004

1. SUMMARY OF AUDITOR'S RESULTS

Type of Financial Statement Opinion	Unqualified
Were there any material control weakness conditions reported at the financial statement level (GAGAS)?	No
Were there any other reportable control weakness conditions reported at the financial statement level (GAGAS)?	No
Was there any reported material non-compliance at the financial statement level (GAGAS)?	No
Were there any material internal control weakness conditions reported for major federal programs?	No
Were there any other reportable internal control weakness conditions reported for major federal programs?	No
Type of Major Programs' Compliance Opinion	Unqualified
Are there any reportable findings under § .510?	No
Major Programs (list):	CFDA # 14.850 & 14.871 Low Rent Public Housing and Housing Choice Voucher
Dollar Threshold: Type A/B	Type A: > \$300,000
Programs	Type B: All Others
Low Risk Auditee?	No

2. FINDINGS RELATED TO THE FINANCIAL STATEMENTS

There are no Findings or questioned costs for the year ended December 31, 2004.

3. FINDINGS REALTED TO FEDERAL AWARDS

There are no Findings or questioned costs for the year ended December 31, 2004.

Parma Public Housing Agency Schedule of Prior Audit Findings December 31, 2004

The following are the status of the December 31, 2003 audit findings.

Finding Number	Finding Summary	Fully Corrected?	Not Corrected; Partially Corrected; Significantly Different Corrective Action Taken; or Finding No Longer Valid; Explain:
GAS-2003-1	Department failed to properly obtain Authorization from Board of Controls for some purchases over \$5,000.	Yes	Finding no longer valid. No exception noted during audit period.
GAS-2003-2	A physical inventory was not performed for fiscal year 2003	Yes	Finding no longer valid. Physical inventory was performed.
FED-2003-1	Audit procedures revealed that the Agency did not perform interviews of contractors' staff to ascertain that proper prevailing wage rates were paid per Davis Bacon Act requirement	Yes	Finding no longer valid. Staff received training on Davis Bacon Act requirement. No contracts were awarded during audit period.
FED-2003-2	3 of 25 reviewed did not document that rent reasonableness was performed.	Yes	Finding no longer valid. No exception noted during audit period.



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PARMA PUBLIC HOUSING AUTHORITY CUYAHOGA COUNTY

CLERK'S CERTIFICATION

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

CLERK OF THE BUREAU

Susan Babbitt

CERTIFIED DECEMBER 30, 2005