

May 29, 2021

Honorable Lourdes A. Leon Guerrero
Governor
Government of Guam

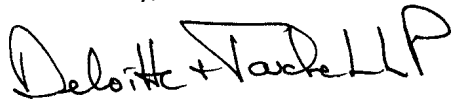
Dear Governor Leon Guerrero:

We have performed an audit of the financial statements of the governmental activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the Government of Guam (GovGuam) as of and for the year ended September 30, 2020 (the "financial statements"), in accordance with auditing standards generally accepted in the United States of America ("generally accepted auditing standards") and have issued our report thereon dated May 29, 2021, which includes a reference to other auditors and an emphasis-of-matter paragraph for the impact of COVID-19.

We have prepared the following comments to assist you in fulfilling your obligation to oversee the financial reporting and disclosure process for which management of GovGuam is responsible.

This report is intended solely for the information and use of the management of GovGuam, the Office of Public Accountability, federal awarding agencies, pass-through entities, and others within the GovGuam organization and is not intended to be and should not be used by anyone other than these specified parties. However, this report is also a matter of public record.

Yours truly,

A handwritten signature in black ink that reads "Deloitte + Touche LLP". The signature is written in a cursive, stylized font.

cc: The Management of Government of Guam



OUR RESPONSIBILITY UNDER GENERALLY ACCEPTED AUDITING STANDARDS, GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS AND THE UNIFORM GUIDANCE

Our responsibility under (1) generally accepted auditing standards, (2) the standards applicable to financial audits, contained in *Government Auditing Standards*, issued by the Comptroller General of the United States ("generally accepted government auditing standards") (generally accepted auditing standards and generally accepted government auditing standards are collectively referred to herein as the "Auditing Standards") and (3) the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (the Uniform Guidance) has been described in our engagement letter dated September 15, 2020. As described in that letter, the objectives of an audit conducted in accordance with the Auditing Standards and the Uniform Guidance are to:

- Express an opinion on the fairness of the presentation of GovGuam's financial statements and the accompanying supplementary information, in relation to the financial statements as a whole, for the year ended September 30, 2020 (the "financial statements"), in accordance with accounting principles generally accepted in the United States of America ("generally accepted accounting principles") in all material respects, and to perform specified procedures on the required supplementary information for the year ended September 30, 2020;
- Express an opinion on whether the supplementary information that accompanies the financial statements, including the Schedule of Expenditures of Federal Awards, is fairly stated, in all material respects, in relation to the financial statements taken as a whole;
- Report on GovGuam's internal control over financial reporting and on its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters for the year ended September 30, 2020, based on an audit of financial statements performed in accordance with generally accepted government auditing standards; and
- Express an opinion on GovGuam's compliance with requirements applicable to each major program and report on GovGuam's internal control over compliance in accordance with the Uniform Guidance.

Our responsibilities under the Auditing Standards and Uniform Guidance include forming and expressing an opinion about whether the financial statements that have been prepared with the oversight of management and the Office of the Governor are presented fairly, in all material respects, in conformity with generally accepted accounting principles. The audit of the financial statements does not relieve management or the Office of the Governor of their responsibilities.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on our judgment, including the assessment of the risks of material misstatement of the financial statements, whether caused by fraud or error. In making those risk assessments, we considered internal control over financial reporting relevant to GovGuam's preparation and fair presentation of the financial statements in order to design audit procedures that were appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of GovGuam's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of GovGuam's internal control over financial reporting. Our consideration of internal control over financial reporting was not designed to identify all deficiencies in internal control over financial reporting that might be significant deficiencies or material weaknesses.

We also considered GovGuam's internal control over compliance with requirements that could have a direct and material effect on a major federal program in order to determine our auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with the Uniform Guidance. Our audit does not, however, provide a legal determination of GovGuam's compliance with those requirements.

SIGNIFICANT ACCOUNTING POLICIES

GovGuam's significant accounting policies are set forth in Note 1 to GovGuam's 2020 financial statements. During the year ended September 30, 2020, there were no significant changes in previously adopted accounting policies or their application.

During the year ended September 30, 2020, GASB issued Statement No. 95, *Postponement of the Effective Dates of Certain Authoritative Guidance*, which postpones the effective dates of GASB Statement Nos. 84, 89, 90, 91, 92 and 93 by one year and GASB Statement No. 87 by 18 months; however, earlier application of the provisions addressed in GASB Statement No. 95 is encouraged and is permitted to the extent specified in each pronouncement as originally issued. In accordance with GASB Statement No. 95, management has elected to postpone implementation of these statements.

In January 2017, GASB issued Statement No. 84, *Fiduciary Activities*. This Statement is to improve guidance regarding the identification of fiduciary activities for accounting and financial reporting purposes and how those activities should be reported. The requirements of this Statement will enhance consistency and comparability by (1) establishing specific criteria for identifying activities that should be reported as fiduciary activities and (2) clarifying whether and how business-type activities should report their fiduciary activities. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 84 will be effective for fiscal year ending September 30, 2021.

In June 2017, GASB issued Statement No. 87, *Leases*. The objective of this Statement is to better meet the information needs of financial statement users by improving accounting and financial reporting for leases by governments. This Statement increases the usefulness of governments' financial statements by requiring recognition of certain lease assets and liabilities for leases that previously were classified as operating leases and as inflows of resources or outflows of resources recognized based on the payment provisions of the contract. Management believes that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 87 will be effective for fiscal year ending September 30, 2022.

In June 2018, GASB issued Statement No. 89, *Accounting for Interest Cost Incurred Before the End of a Construction Period*. The objectives of this Statement are (1) to enhance the relevance and comparability of information about capital assets and the cost of borrowing for a reporting period and (2) to simplify accounting for interest cost incurred before the end of a construction period. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 89 will be effective for fiscal year ending September 30, 2022.

In March 2018, GASB issued Statement No. 90, *Majority Equity Interests - An Amendment of GASB Statements No. 14 and 61*. The primary objectives of this Statement are to improve the consistency and comparability of reporting a government's majority equity interest in a legally separate organization and to improve the relevance of financial statement information for certain component units. It defines a majority equity interest and specifies that a majority equity interest in a legally separate organization should be reported as an investment if a government's holding of the equity interest meets the definition of an investment. A majority equity interest that meets the definition of an investment should be measured using the equity method, unless it is held by a special-purpose government engaged only in fiduciary activities, a fiduciary fund, or an endowment (including permanent and term endowments) or permanent fund. Those governments and funds should measure the majority equity interest at fair value. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 90 will be effective for fiscal year ending September 30, 2021.

SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

In May 2019, GASB issued Statement No. 91, *Conduit Debt Obligations*. The primary objectives of this Statement are to provide a single method of reporting conduit debt obligations by issuers and eliminate diversity in practice associated with (1) commitments extended by issuers, (2) arrangements associated with conduit debt obligations, and (3) related note disclosures. This Statement achieves those objectives by clarifying the existing definition of a conduit debt obligation; establishing that a conduit debt obligation is not a liability of the issuer; establishing standards for accounting and financial reporting of additional commitments and voluntary commitments extended by issuers and arrangements associated with conduit debt obligations; and improving required note disclosures. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 91 will be effective for fiscal year ending September 30, 2023.

In January 2020, GASB issued Statement No. 92, *Omnibus 2020*. The objectives of this Statement are to enhance comparability in accounting and financial reporting and to improve the consistency of authoritative literature by addressing practice issues that have been identified during implementation and application of certain GASB Statements. This Statement addresses a variety of topics and includes specific provisions about the effective date of Statement No. 87, *Leases*, and Implementation Guide No. 2019-3, *Leases*, for interim financial reports, the terminology used to refer to derivative instruments and the applicability of certain requirements of Statement No. 84, *Fiduciary Activities*, to postemployment benefits. The requirements related to the effective date of GASB Statement No. 87 and Implementation Guide 2019-3, reissuance recoveries and terminology used to refer to derivative instruments are effective upon issuance. In accordance with GASB Statement No. 95, the remaining requirements of GASB Statement No. 92 is effective for the fiscal year ending September 30, 2022.

In March 2020, GASB issued Statement No. 93, *Replacement of Interbank Offered Rates (IBOR)*. The primary objective of this Statement is to address those and other accounting and financial reporting implications of the replacement of an IBOR. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. Except for paragraphs 11b, 13, and 14, GASB Statement No. 93 will be effective for fiscal year ending September 30, 2021. The requirement in paragraphs 11b, 13, and 14 are effective for fiscal year September 30, 2022.

In March 2020, GASB issued Statement No. 94, *Public-Private and Public-Public Partnerships and Availability Payment Arrangements*. The primary objective of this Statement is to improve financial reporting by addressing issues related to public-private and public-public partnership arrangements. This statement also provides guidance for accounting and financial reporting for availability payment arrangements. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. GASB Statement No. 94 will be effective for fiscal year ending September 30, 2023.

In May 2020, GASB issued Statement No. 96, *Subscription-Based Information Technology Arrangements*. This Statement provides guidance on the accounting and financial reporting for subscription-based information technology arrangements (SBITAs) for government end users (governments). This Statement (1) defines a SBITA; (2) establishes that a SBITA results in a right-to-use subscription asset - an intangible asset - and a corresponding subscription liability; (3) provides the capitalization criteria for outlays other than subscription payments, including implementation costs of a SBITA; and (4) requires note disclosures regarding a SBITA. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. GASB Statement No. 96 will be effective for fiscal year ending September 30, 2023.

SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

In June 2020, GASB issued Statement No. 97, *Certain Component Unit Criteria, and Accounting and Financial Reporting for Internal Revenue Code Section 457 Deferred Compensation Plans - an amendment of GASB Statements No. 14 and No. 84, and a supersession of GASB Statement No. 32*. The primary objectives of this Statement are to (1) increase consistency and comparability related to the reporting of fiduciary component units in circumstances in which a potential component unit does not have a governing board and the primary government performs the duties that a governing board typically would perform; (2) mitigate costs associated with the reporting of certain defined contribution pension plans, defined contribution other postemployment benefit (OPEB) plans, and employee benefit plans other than pension plans or OPEB plans (other employee benefit plans) as fiduciary component units in fiduciary fund financial statements; and (3) enhance the relevance, consistency, and comparability of the accounting and financial reporting for Internal Revenue Code (IRC) Section 457 deferred compensation plans (Section 457 plans) that meet the definition of a pension plan and for benefits provided through those plans. GASB Statement No. 97 will be effective for fiscal year ending September 30, 2022.

We have evaluated the significant qualitative aspects of the GovGuam's accounting practices, including accounting policies, accounting estimates and financial statement disclosures and concluded that the policies are appropriate, adequately disclosed, and consistently applied by management.

ACCOUNTING ESTIMATES

Accounting estimates are an integral part of the financial statements prepared with the oversight of management and are based on management's current judgments. Those judgments are ordinarily based on knowledge and experience about past and current events and on assumptions about future events. Significant accounting estimates reflected in GovGuam's 2020 financial statements include pensions and other postemployment benefits, which are actuarially determined, management's estimate of the allowance for uncollectible accounts, which is determined based on management's evaluation of the collectability of current accounts and historical trends, management's estimate of the provision for tax refunds, which is determined based on periodic review of tax returns in light of historical experience and the nature and volume of tax returns submitted.

UNCORRECTED MISSTATEMENTS

Our audit of the financial statements was designed to obtain reasonable, rather than absolute, assurance about whether the financial statements are free of material misstatement, whether caused by error or fraud. We have attached to this letter, as Appendices A and B to Attachment II, summaries of uncorrected misstatements aggregated by us during the current engagement and pertaining to the latest period presented and a summary of disclosure items passed that we presented to management during the current audit engagement that were determined by management to be immaterial, both individually and in the aggregate, to the financial statements taken as a whole.

CORRECTED MISSTATEMENTS

As the result of our audit work, we identified matters that resulted in audit adjustments that we believe, either individually or in the aggregate, would have a significant effect on GovGuam's financial reporting process. Such adjustments, listed in Attachment I, were brought to the attention of management as a result of our audit procedures and were corrected by management during the current period and are reflected in the 2020 financial statements.

DISAGREEMENTS WITH MANAGEMENT

We have not had any disagreements with management related to matters that are material to GovGuam's 2020 financial statements.

OUR VIEWS ABOUT SIGNIFICANT MATTERS THAT WERE THE SUBJECT OF CONSULTATION WITH OTHER ACCOUNTANTS

We are not aware of any consultations that management may have had with other accountants about auditing and accounting matters during 2020.



SIGNIFICANT FINDINGS OR ISSUES DISCUSSED, OR SUBJECT OF CORRESPONDENCE, WITH MANAGEMENT PRIOR TO OUR RETENTION

Throughout the year, routine discussions were held, or were the subject of correspondence, with management regarding the application of accounting principles or auditing standards in connection with transactions that have occurred, transactions that are contemplated, or reassessment of current circumstances. In our judgment, such discussions or correspondence were not held in connection with our retention as auditors.

OTHER SIGNIFICANT FINDINGS OR ISSUES ARISING FROM THE AUDIT DISCUSSED, OR SUBJECT OF CORRESPONDENCE, WITH MANAGEMENT

Throughout the year, routine discussions were held, or were the subject of correspondence, with management. In our judgment, such discussions or correspondence did not involve significant findings or issues requiring communication to the Office of the Governor.

SIGNIFICANT DIFFICULTIES ENCOUNTERED IN PERFORMING THE AUDIT

In our judgment, we received the full cooperation of GovGuam's management and staff and had unrestricted access to GovGuam's senior management in the performance of our audit.

MANAGEMENT'S REPRESENTATIONS

We have made specific inquiries of GovGuam's management about the representations embodied in the financial statements. In addition, we have requested that management provide to us the written representations GovGuam is required to provide to its independent auditors under generally accepted auditing standards. We have attached to this letter, as Attachment II, a copy of the representation letters we obtained from management.

EMPHASIS-OF-MATTER PARAGRAPH

On March 11, 2020, the World Health Organization declared the spread of the novel strain of coronavirus (COVID-19) a global pandemic and recommended containment and mitigation measures worldwide. On March 13, 2020, President Donald J. Trump declared a national emergency within the United States. Following the national emergency declared by the U.S. President, on March 14, 2020, Governor Lourdes A. Leon Guerrero issued Executive Order 2020-03 declaring a public health emergency in response to the COVID-19 outbreak. Furthermore, Executive Order 2020-04 ordered the closure of all non-essential GovGuam offices, prohibited large gatherings, and restricted entry into Guam from countries with confirmed COVID-19 cases. As a result, schools and non-essential government agencies and private sector businesses temporarily closed. GovGuam closed its offices to the public and required all non-essential employees to work from home.

On March 28, 2020, the U.S. President signed a major disaster declaration for Guam and ordered federal assistance to supplement local recovery efforts in connection with the COVID-19 pandemic. Federal assistance in the form of grants from the U.S. Treasury, Public Assistance reimbursements from FEMA, funding for Economic Impact Payments, and Pandemic Unemployment Assistance have been made available to Guam under the provisions of the Coronavirus Aid, Relief, and Economic Security (CARES) Act and related legislation.

The federal government has continued to implement further economic assistance programs. The date for the use of CARES Act funds was extended from December 31, 2020 to December 31, 2021 by the Consolidated Appropriations Act, 2021. Additional funding measures included a second round of Economic Impact Payments, extension of Pandemic Unemployment Assistance payments to March 2021, the establishment of a Rental Assistance Program, funding for vaccines and testing, and other direct payments to individuals and businesses.

EMPHASIS-OF-MATTER PARAGRAPH, CONTINUED

On March 11, 2021, the U.S. President signed the American Rescue Plan Act of 2021, which provided further federal assistance, including a third round of Economic Impact Payments, a further extension of Pandemic Unemployment Assistance through September 6, 2021, direct funding payments to Guam, currently estimated to total \$620 million, and permanent funding to repay Guam for Earned Income Tax Credit and Child Tax Credit payments paid or allowed to taxpayers under mirror provisions of Guam Territorial Tax legislation, beginning with calendar year 2021 tax returns.

Because of the evolving nature of the COVID-19 pandemic, GovGuam cannot predict the extent or duration of the outbreak. While the disruption is currently expected to be temporary, there is considerable uncertainty around the duration. Therefore, GovGuam expects this emergency to negatively impact local tax collections and general economic conditions globally, nationally and locally, for which the related financial impact cannot be reasonably estimated at this time. GovGuam has resumed normal operations; however, many private sector businesses have either suspended their operations or are conducting business at reduced levels.

In common with other States, tribal governments and territories, Guam is continuously evaluating the economic impact of the unusual conditions associated with the pandemic. Guam has an aggressive vaccination program designed to achieve the highest level of immunity possible. However, conditions and circumstances throughout the world and, in particular, in the markets which provide tourism demand for Guam, can quickly influence the local economy.

The proposed wording of the emphasis-of-matter paragraph follows:

“COVID-19

As discussed in Note 15 to the financial statements, GovGuam determined that the COVID-19 pandemic may negatively impact its financial position. However, due to uncertainty surrounding the duration of the state of emergency, GovGuam is unable to reasonably estimate its ultimate financial impact. Our opinions are not modified with respect to this matter.”

CONTROL-RELATED MATTERS

We have issued a separate report to you, also dated May 29, 2021, on GovGuam’s internal control over financial reporting and on its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters, which was based upon the audit performed in accordance with *Government Auditing Standards*. Within that report, we noted certain matters that were considered to be material weaknesses under standards established by the American Institute of Certified Public Accountants. We have also issued a separate report to you, also dated May 29, 2021, involving GovGuam’s compliance with requirements applicable to each major program and on internal control over compliance in accordance with the Uniform Guidance.

We have communicated to management, in two separate letters both dated May 29, 2021, other deficiencies and other matters related to GovGuam’s internal control over financial reporting and GovGuam’s internal control over its information technology environment that we identified during our audit.

Although we have included management’s written responses to our comments, such responses have not been subjected to the auditing procedures applied in our audit of the basic financial statements and, accordingly, we do not express an opinion or provide any form of assurance on the appropriateness of the responses or the effectiveness of any corrective actions described therein.

* * * * *

Government of Guam
 Summary of Corrected Misstatements
 September 30, 2020

GENERAL FUND			
#	Name	Debit	Credit
1 AJE To correct opening net position			
110041110	UNAPPROPRIATED SURPLUS	117,988.01	
110014205	DUE TO FROM TEF		117,988.01
136310213	LANDFILL SEC 30 09 BOND RES FD	2,824.62	
136341110	UNAPPROPRIATED SURPLUS		2,824.62
		<u>120,812.63</u>	<u>120,812.63</u>
2 AJE To correct SWOF debt service transfer in			
310050416	TRANSFER IN - SOLID WASTE	3,059,331.86	
110014364	DUE TO/FR 2019 GO BND-NEW CELL		3,059,331.86
136414100	DUE TO/FR GENERAL FUND	3,059,331.86	
336450416	TRANSFER IN		3,059,331.86
		<u>6,118,663.72</u>	<u>6,118,663.72</u>
3 AJE To record operating transfers for unfunded fund deficits			
110014244	DUE TO/FR GUAM MUSEUM FUND		538,060.36
110014632	DUE TO/FR INDIRECT COST FUND		1,370,500.78
110014222	DUE TO/FROM LAND SURVEY REV FD		348,943.28
110014604	DUE TO/FR LIBRARY RESOURCE FND		483,339.01
110014620	DUE TO/FR PUBLIC REC SERVICES		199,541.71
110014317	DUE TO/FROM GUAM REGIONAL TRAN		453,248.05
110014217	DUE TO/FROM SAFE STREETS ACT F		145,991.01
110014202	DUE TO/FROM VEHICLE/ST.LIGHT		240,534.13
110014603	DUE TO/FR TAX COLLECTION ENHAN		136,246.57
110071110TOA	EXPENDITURES - TRANSFERS OUT	3,916,404.90	
		<u>3,916,404.90</u>	<u>3,916,404.90</u>
4 AJE To record transfer of GALC SID expenditures			
100-111GG	REGULAR SALARY		171,170.00
100-113GG	FRINGE		42,652.00
100-113GG	FRINGE		16,460.00
100-230GG	CONTRACT		12,991.00
100-233GG	BLDG RENT		6,174.00
100-240GG	SUPPLIES		2,180.00
100-250GG	EQUIPMENT		27,676.00
100-450GG	CAPITAL		37,470.00
100-290GG	MISCELLANEOUS		4,529.00
110014DTT1	DUE TO GALC	321,302.00	
		<u>321,302.00</u>	<u>321,302.00</u>
5 AJE To adjust PC-11 and record as transfers out			
110071110TOA	EXPENDITURES - TRANSFERS OUT	7,666,613.00	
110041110	UNAPPROPRIATED SURPLUS		7,666,613.00
		<u>7,666,613.00</u>	<u>7,666,613.00</u>

Government of Guam
 Summary of Corrected Misstatements
 September 30, 2020

GENERAL FUND			
#	Name	Debit	Credit
6 AJE To recognize delinquent tax receivables			
110011140	INCOME TAX RECEIVABLE DELINQUENT	91,797,556.06	
110011197	INCOME TAX RECEIVABLE ALLOWANCE		91,797,556.06
110011240	GRT RECEIVABLES DELINQUENT	76,439,084.30	
110011299	GRT RECEIVABLES DELINQUENT ALLOWANCE		76,439,084.30
		<u>168,236,640.36</u>	<u>168,236,640.36</u>
7 AJE To reverse PC12			
293-111TOP	REGULAR SALARY		12,465.69
293-113TOP	FRINGE		5,200.59
129314100	DUE TO/FR GENERAL FUND	17,666.28	
110014293	DUE TO/FR MED IND PROG PAYMENT		17,666.28
100-111PH	REGULAR SALARY		3,144.96
100-113PH	FRINGE		1,282.36
100-233PH	BLDG RENT		1,732.78
100-233TOP	BLDG RENT		7,724.96
100-361PH	POWER UTILITY		99.13
100-290TOF	MISCELLANEOUS	32,040.46	
100-361ECO	POWER UTILITY		440.96
110014677	DUE TO/FR COVID-19 SPECIAL FND		29.61
110014101	DUE TO/FROM FEDERAL GRANT FUND	80.58	
		<u>49,787.32</u>	<u>49,787.32</u>
FEDERAL GRANTS FUND			
1 AJE To reconcile opening net position			
110141110	FUND BALANCE		13,756,620.84
110111293	ACCT REC-U.S. HUMAN SERVICES	13,756,620.84	
		<u>13,756,620.84</u>	<u>13,756,620.84</u>
2 AJE To reverse FY2019 accrual			
310150000	Revenues	7,420,258.30	
101-290PH	MISCELLANEOUS		7,420,258.30
		<u>7,420,258.30</u>	<u>7,420,258.30</u>
3 AJE To complete PC23 Adjustment			
310150000	Revenues		126,647.16
110111100	ACCT REC.- FGIA SUSPENSE	126,647.16	
		<u>126,647.16</u>	<u>126,647.16</u>

Government of Guam
 Summary of Corrected Misstatements
 September 30, 2020

FEDERAL GRANTS FUND			
#	Name	Debit	Credit
4 AJE To reverse PC12			
110111293	ACCT REC-U.S. HUMAN SERVICES		32,040.46
101-111CS	REGULAR SALARY		46,672.05
101-111PH	REGULAR SALARY	71,002.57	
101-111TOF	REGULAR SALARY		8,719.84
101-112PH	OVERTIME SALARY	29.61	
101-113CS	FRINGE		14,574.91
101-113PH	FRINGE	23,929.68	
101-113TOF	FRINGE		2,871.85
101-230CS	CONTRACT		18,295.16
101-230PH	CONTRACT	18,295.16	
101-233CS	BLDG RENT		7,898.32
101-233PH	BLDG RENT	19,366.05	
101-233TOF	BLDG RENT		2,009.99
101-240CS	SUPPLIES		2,443.75
101-240PH	SUPPLIES	2,443.75	
101-361CS	POWER UTILITY		141.12
101-361PH	POWER UTILITY	816.00	
101-361TOF	POWER UTILITY		134.79
110114100	DUE TO/FROM GENERAL FUND		80.58
		<u>135,882.82</u>	<u>135,882.82</u>
5 AJE To complete PC24 Adjustment			
310150000	Revenues		161,806.17
110111100	ACCT REC.- FGIA SUSPENSE	161,806.17	
		<u>161,806.17</u>	<u>161,806.17</u>
CARES ACT UNEMPLOYMENT ASSISTANCE FUND			
#	Name	Debit	Credit
1 AJE To recognize PUA revenue for YE deposit			
167932110	RESERVE FOR PUA/FPUC BENEFITS	15,624,033.69	
367950124	CARES ACT PUA/FPUC BENEFITS		15,624,033.69
		<u>15,624,033.69</u>	<u>15,624,033.69</u>
COVID-19 FUND			
#	Name	Debit	Credit
1 AJE To record deferred revenue not expensed			
367755101	COVID19 \$117 RELIEF FUNDS	52,843,121.25	
167727221	FGIA - U.S. DEPT OF TREASURY		52,843,121.25
		<u>52,843,121.25</u>	<u>52,843,121.25</u>
2 AJE To adjust deferred revenues for expenditures transferred due to PC23			
367755101	COVID19 \$117 RELIEF FUNDS	126,617.55	
167727221	FGIA - U.S. DEPT OF TREASURY		126,617.55
		<u>126,617.55</u>	<u>126,617.55</u>

Government of Guam
 Summary of Corrected Misstatements
 September 30, 2020

COVID-19 FUND			
#	Name	Debit	Credit
3 AJE To adjust deferred revenues for expenditures transferred due to PC24			
367755101	COVID19 \$117 RELIEF FUNDS	161,806.17	
167727221	FGIA - U.S. DEPT OF TREASURY		161,806.17
		<u>161,806.17</u>	<u>161,806.17</u>
4 AJE Reverse PC 12			
677-112PH	OVERTIME SALARY		29.61
167714100	DUE TO/FR GENERAL FUND	29.61	
		<u>29.61</u>	<u>29.61</u>
OTHER GOVERNMENTAL FUNDS			
#	Name	Debit	Credit
1 AJE To correct opening net position			
120541110	FUND BALANCE		117,988.01
120514100	DUE TO/FR GENERAL FUND	117,988.01	
		<u>117,988.01</u>	<u>117,988.01</u>
2 AJE To correct invalid UOG A/P			
129721590	ACCRUED EXPENSE PAYABLE	1,233,283.00	
329757390	ADJUST PRIOR YRS EXPN/REV		1,233,283.00
		<u>1,233,283.00</u>	<u>1,233,283.00</u>
3 AJE To record PL 35-36 appropriation to GCC			
120571110TOF	TRANSFERS OUT	200,400.00	
120514100	DUE TO/FR GENERAL FUND		200,400.00
165714100	DUE TO/FR GENERAL FUND	200,400.00	
365750205	TRANS IN FROM TEFF - GCC		200,400.00
		<u>400,800.00</u>	<u>400,800.00</u>
4 AJE To record PL 26-76 appropriation to Fund 317			
120871110TOF	TRANSFERS OUT	292,028.05	
120814100	DUE TO/FROM GENERAL FUND		292,028.05
131714100	DUETO/FROM GENERAL FUND	292,028.05	
331750208	TRANSFER FROM THF		292,028.05
		<u>584,056.10</u>	<u>584,056.10</u>
5 AJE To reinstate PC14 Fund 208 Obj 230 Func TRN			
208-230TRN	CONTRACT	986,041.17	
120821590	ACCRUED EXPENSE PAYABLE		986,041.17
		<u>986,041.17</u>	<u>986,041.17</u>

Government of Guam
 Summary of Corrected Misstatements
 September 30, 2020

OTHER GOVERNMENTAL FUNDS			
#	Name	Debit	Credit
6 AJE To record transfers from Fund 416 to Fund 652			
365250416	TRANSFER IN FROM SW		317,063.71
652-290ERP	MISCELLANEOUS	317,063.71	
416-290TOF	MISCELLANEOUS		317,063.71
141671110TOF	TRANSFER OUT	317,063.71	
		<u>634,127.42</u>	<u>634,127.42</u>
7 AJE To correct receivable from GIAA			
120912329	ALLOWANCE FOR DOUBTFUL ACCOUNT	615,514.49	
120912321	A/R C & Q SERVICE FEE	1,692,016.17	
320963202	PASSGR INSPEC FEE-AIRPT AUTH		803,105.53
120912322	A/R G.A.A. PASSENGER FEES		1,504,425.13
		<u>2,307,530.66</u>	<u>2,307,530.66</u>
8 AJE To record permanent transfers for unfunded fund deficits			
124414100	DUE TO/FROM GENERAL FUND	538,060.36	
163214100	DUE TO/FR GENERAL FUND	1,370,500.78	
122214100	DUE TO/FR GENERAL FUND	348,943.28	
160414100	DUE TO/FR GENERAL FUND	483,339.01	
162014100	DUE TO/FR GENERAL FUND	199,541.71	
131714100	DUETO/FROM GENERAL FUND	453,248.05	
121714100	DUE TO/FROM GENERAL FUND	145,991.01	
120214100	DUE TO/FROM GENERAL FUND	240,534.13	
160314100	DUE TO/FR GENERAL FUND	136,246.57	
324450100	TRANSFER IN FROM GENERAL FUND		538,060.36
363250100	TRANSFERS IN FROM GENERAL FUND		1,370,500.78
322250100	TRANSFERS IN FROM GENERAL FUND		348,943.28
360450100	TRANSFER IN FROM GENERAL FUND		483,339.01
362050100	TRANSFER IN		199,541.71
331750100	TRANSFER IN		453,248.05
321750100	TRANSFER IN		145,991.01
320250100	TRANSFERS IN		240,534.13
360350100	TRANSFER IN FROM GENERAL FUND		136,246.57
		<u>3,916,404.90</u>	<u>3,916,404.90</u>
9 AJE To reverse and adjust PC-05			
141541110	FUND BALANCE		514,124.93
141510210	CIB-CHAM LOAN GUARANTEE FUND		1,813.07
141510211	BOG (#2501-002274)	204,277.00	
141510212	BOG (#0101-295976)	11,661.00	
141510213	BOG (#0401-437964)	300,000.00	
		<u>515,938.00</u>	<u>515,938.00</u>

Government of Guam
 Summary of Corrected Misstatements
 September 30, 2020

OTHER GOVERNMENTAL FUNDS			
#	Name	Debit	Credit
	10 AJE To adjust PC-11 and record as transfers		
320650100	TRANSFER IN		7,666,613.00
120641110	FUND BALANCE	7,061,212.38	
135441110	FUND BALANCE	605,400.62	
335450206	TRANSFER FROM TAF		605,400.62
120671110TOF	TRANSFERS OUT	605,400.62	
		<u>8,272,013.62</u>	<u>8,272,013.62</u>
GOVERNMENT-WIDE			
#	Name	Debit	Credit
	1 AJE To adjust capital lease obligations		
135321225	GDOE CAPITAL LEASES	7,353,893.00	
135315671	GDOE AMT TO BE PROV-CAP LEASES		7,228,891.93
135315673	GDOE MAINT & INSURANCE RESERVE		125,000.00
135321225	GDOE CAPITAL LEASES		1.07
		<u>7,353,893.00</u>	<u>7,353,893.00</u>
	2 AJE To adjust Bond Premiums		
135321219	PREMIUM ON BONDS ISSUED	4,187,712.00	
135315816	AMT TO BE PROVIDED FOR BONDS		4,187,712.00
		<u>4,187,712.00</u>	<u>4,187,712.00</u>
	3 AJE To adjust Bond Discounts		
135315817	DISCOUNT ON BONDS ISSUED		189,108.00
135315816	AMT TO BE PROVIDED FOR BONDS	189,108.00	
135315817	DISCOUNT ON BONDS ISSUED		9,677.00
135315816	AMT TO BE PROVIDED FOR BONDS	9,677.00	
		<u>198,785.00</u>	<u>198,785.00</u>
	4 AJE To adjust Deferred Loss on Refunding		
135316815	DEFERRED LOSS ON REFUNDING		5,349,024.00
135315816	AMT TO BE PROVIDED FOR BONDS	5,349,024.00	
		<u>5,349,024.00</u>	<u>5,349,024.00</u>
	5 AJE To adjust accrued interest		
135321141	ACCRUED INTEREST ON BONDS PAYB	483,580.00	
135315816	AMT TO BE PROVIDED FOR BONDS		483,580.00
		<u>483,580.00</u>	<u>483,580.00</u>
	6 AJE To adjust Landfill Liability - GASB 18		
135321165	GASB 18 LANDFILL LIABILITY	2,444,939.00	
135321166	GASB18 LANDFIL LIABILITY-LAYON	781,320.00	
135315675	AMT TO BE PROVIDED FOR LANDFIL		3,226,259.00
		<u>3,226,259.00</u>	<u>3,226,259.00</u>

Government of Guam
 Summary of Corrected Misstatements
 September 30, 2020

GOVERNMENT-WIDE			
#	Name	Debit	Credit
	7 AJE To adjust capital assets - Unified Courts, GDOE		
139018500	CONSTRUCTION IN PROGRESS	3,994,039.54	
139042100	INVESTMENT IN FIXED ASSETS-GF		25,792,165.80
139018110	BLDG/STRUCTURES-GEN FUND	9,084,841.36	
139018339	ALWS FOR DEPN-EQPT CONDEMNATIO		722,005.06
139018100	LAND-GENERAL FUND		6,806,562.00
139018120	EQUIPMENT/FUR/OTHERS-GEN FUND	1,210,403.96	
139018500	CONSTRUCTION IN PROGRESS	19,031,448.00	
		<u>33,320,732.86</u>	<u>33,320,732.86</u>
	8 AJE To adjust OPEB liability		
135316822	DEFERRED OUTFLOWS FROM OPEB	455,393,943.00	
135324006	DEFERRED INFLOWS FROM OPEB		30,503,153.25
135322006	OPEB LIABILITY		462,781,535.00
135315101	AMT TO BE PROV (FOR OPEB)	37,890,745.25	
		<u>493,284,688.25</u>	<u>493,284,688.25</u>
	9 AJE To adjust Pension liability		
135316820	DEFERRED OUTFLOWS FR PENSIONS		116,576,513.00
135324005	DEFERRED INFLOWS FROM PENSIONS	147,511,424.00	
135322005	NET PENSION LIABILITY		41,262,058.00
135316819	AMT TO BE PROV FOR PENSIONS	10,327,147.00	
		<u>157,838,571.00</u>	<u>157,838,571.00</u>
	10 AJE To adjust Layon tax credits liability		
135315815	AMT PROV FOR LAND-LANDFILL CON		1,255,471.00
135321215	NOTES PAYABLE LAND LANDFILL	1,255,471.00	
		<u>1,255,471.00</u>	<u>1,255,471.00</u>

We have reviewed the adjustments above and authorize that they be recorded in the General Ledger as of September 30, 2020. The adjustments are the result of errors and are not the result of fraud or illegal acts.

Edward M. Birn
 Director
 Department of Administration



EDWARD M. BIRN
Director (Direktur)

BERNADINE C. GINES
Deputy Director (Sigundo Direktur)

**DEPARTMENT OF
ADMINISTRATION**
DIPATTAMENTON ATMENESTRASION

DIRECTOR'S OFFICE
(Uffisiinan Direktur)

Telephone (Telifon) (671) 475-1101/1250 • Fax (Faksa) (671) 477-5788



LOURDES A. LEON GUERRERO
Governor (Maga'håga)

JOSHUA F. TENORIO
Lt. Governor (Sigundo Maga'håga)

May 29, 2021

Deloitte & Touche LLP
361 South Marine Corps Drive
Tamuning GU 96913

We are providing this letter in connection with your audit of the financial statements of the governmental activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the Government of Guam (the "Government"), as of and for the year ended September 30, 2020, which collectively comprise the Government's basic financial statements for the purpose of expressing an opinion as to whether the basic financial statements present fairly, in all material respects, the financial position, results of operations or changes in fund balances, and cash flows, as applicable, of the Government in accordance with accounting principles generally accepted in the United States of America (GAAP).

We confirm that we are responsible for the following:

- a. The preparation and fair presentation in the basic financial statements of financial position of the governmental activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information, in accordance with GAAP.
- b. The design, implementation, and maintenance of internal control:
 - Relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error
 - To prevent and detect fraud.
- c. The review and approval of the financial statements and related notes and acknowledge your role in the preparation of this information. Specifically, we acknowledge that your role in the preparation of the financial statements was a matter of convenience rather than one of necessity. We have reviewed the financial statement preparation assistance provided by you and acknowledge that the financial statements are prepared in accordance with GAAP. Our review was based on the use of the financial statement disclosure checklist for general purpose financial statements obtained from the Government Finance Officers Association.

Certain representations in this letter are described as being limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement.

We confirm, to the best of our knowledge and belief, the following representations made to you during your audit.

1. The basic financial statements referred to above are fairly presented in accordance with GAAP. In addition:
 - a. The financial statements include all component units as well as joint ventures with an equity interest, and properly disclose all other joint ventures and other related organizations.
 - b. Net position components (net investment in capital assets; restricted; and unrestricted) are properly classified and, if applicable, approved.
 - c. Deposits and investment securities are properly classified in the category of custodial credit risk.
 - d. Capital assets, including infrastructure assets, are properly capitalized, reported, and, if applicable, depreciated.
 - e. Required supplementary information is measured and presented within prescribed guidelines.
 - f. Applicable laws and regulations are followed in adopting, approving, and amending budgets.
 - g. The Government's policy regarding whether to first apply restricted or unrestricted resources when an expense is incurred for purposes for which both restricted and unrestricted net position is available and appropriately disclosed and that net position is properly recognized under the policy.
 - h. The financial statements properly classify all funds and activities, including special and extraordinary items.
 - i. All funds that meet the quantitative criteria in the GASB Codification of Government Accounting and Financial Reporting Standards ("GASB Codification) Section 2200.159 for presentation as major are identified and presented as such and all other funds that are presented as major are particularly important to financial statement users.
 - j. Expenses have been appropriately classified in or allocated to functions and programs in the statement of activities, and allocations have been made on a reasonable basis.
 - k. Revenues are appropriately classified in the statement of activities within program revenues, general revenues, contributions to term or permanent endowments, or contributions to permanent fund principal.
 - l. The Government has followed GASB Codification Section 1800.178 regarding which resources (restricted, committed, assigned, or unassigned) are considered to be spent for expenditures to determine the fund balance classifications for financial reporting purposes.
 - m. Interfund, internal, and intra-Government activity and balances have been appropriately classified and reported.
 - n. Fund balance restrictions, commitments, and assignments are properly classified and, if applicable, approved.

2. The Government has provided to you all relevant information and access as agreed in the terms of the audit engagement letter.
3. The Government has made available to you:
 - a. All financial records and related data for all financial transactions of the Government and for all funds administered by the Government. The records, books, and accounts, as provided to you, record the financial and fiscal operations of all funds administered by the Government and provide the audit trail to be used in a review of accountability. Information presented in financial reports is supported by the books and records from which the financial statements have been prepared.
 - b. Contracts and grant agreements (including amendments, if any) and any other correspondence that has taken place with federal agencies.
4. There has been no:
 - a. Action taken by Government management that contravenes the provisions of federal laws, or Guam law, and laws and regulations, or of contracts and grants applicable to the Government.
 - b. Communications with other regulatory agencies concerning noncompliance with or deficiencies in financial reporting practices or other matters that could have a material effect on the financial statements.
5. We believe the effects of any uncorrected financial statement misstatements aggregated by you during the current audit engagement and pertaining to the latest period presented are immaterial, both individually and in the aggregate, to the financial statements taken as a whole. A summary of such uncorrected misstatements has been attached as Appendix A.
6. We have completed our procedures to evaluate the accuracy and completeness of the disclosures in our financial statements. As a result of the evaluation process, we identified certain disclosures that, although required by GAAP, have been omitted from our financial statements. Those omitted disclosures that are regarded as more than clearly trivial are attached as Appendix B. We believe the effects of the omitted disclosures are quantitatively and qualitatively immaterial, both individually and in the aggregate, to the financial statements as a whole.
7. The Government has not performed a formal risk assessment, including the assessment of the risk that the financial statements may be materially misstated as a result of fraud. However, management has made available to you their understanding about the risks of fraud in the Government and do not believe that the financial statements are materially misstated as a result of fraud.
8. We have no knowledge of any fraud or suspected fraud affecting the Government involving:
 - a. Management.
 - b. Employees who have significant roles in the Government's internal control.
 - c. Others, where the fraud could have a material effect on the financial statements.

9. We have no knowledge of any allegations of fraud or suspected fraud affecting the Government's financial statements communicated by employees, former employees, analysts, regulators, or others.
10. There are no unasserted claims or assessments that legal counsel has advised us are probable of assertion and must be disclosed in accordance with GASB Codification Section C50, *Claims and Judgments*, except as disclosed in Note 13 to the financial statements.
11. The methods, significant assumptions, and the data used by us in making the accounting estimates and the related disclosures are appropriate to achieve recognition, measurement, or disclosure that is in accordance with GAAP.
12. We are responsible for the preparation of the Schedule of Expenditures of Federal Awards in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* ("OMB Uniform Guidance"). We have identified and disclosed all of the Government's government programs and related activities subject to the OMB Uniform Guidance compliance audit. In addition, we have accurately completed the appropriate sections of the data collection form.
13. We are responsible for compliance with local, state, and federal laws, rules, and regulations, including compliance with the requirements of OMB Uniform Guidance, and the provisions of grants and contracts relating to the Government's operations. We are responsible for understanding and complying with the requirements of the federal statutes, regulations, and the terms and conditions of federal awards related to each of the Government's federal programs. We are responsible for establishing and maintaining the components of internal control relating to our activities in order to achieve the objectives of providing reliable financial reports, effective and efficient operations, and compliance with laws and regulations. We are responsible for maintaining accounting and administrative control over revenues, obligations, expenditures, assets, and liabilities.
14. We have informed you of all investigations or legal proceedings that have been initiated during the year ended September 30, 2020 or are in process as of September 30, 2020.
15. We are responsible for all nonaudit services performed by you during the year ended September 30, 2020 and through May 29, 2021.
16. We are responsible for establishing and maintaining, and have established and maintained, effective internal control over compliance for federal programs that provides reasonable assurance that we are managing federal awards in compliance with laws, regulations, and provisions of contracts or grant agreements that could have a material effect on its federal programs.
17. We have disclosed to you all deficiencies in the design or operation of internal control over financial reporting identified as part of our evaluation, including separately disclosing to you all such deficiencies that are significant deficiencies or material weaknesses in internal control over financial reporting.
18. No events have occurred subsequent to September 30, 2020 that require consideration as adjustments to or disclosures in the schedule of federal awards and related notes or that existed at the end of the reporting period that affect noncompliance during the reporting period.
19. We have disclosed all known noncompliance with direct and material compliance requirements occurring subsequent to September 30, 2020.

20. No changes in internal control over compliance or other factors that might significantly affect internal control, including any corrective action taken by the Government with regard to significant deficiencies and material weaknesses in internal control over compliance, have occurred subsequent to September 30, 2020.
21. Federal awards expenditures have been charged in accordance with applicable cost principles.
22. The Reporting Package submitted to the Federal Audit Clearinghouse (FAC) as defined by the Uniform Grant Guidance section 2CFR200.512(3)(c) does not contain protected personally identifiable information.
23. We have disclosed all contracts or other agreements with service organizations.
24. We have disclosed to you all communications from service organizations relating to noncompliance with the requirements of federal statutes, regulations, and terms and conditions of federal awards at those organizations.
25. We have:
 - a. Identified and disclosed to you the requirements of federal statutes, regulations, and the terms and conditions of federal awards that are considered to have a direct and material effect on each major program under audit.
 - b. Complied, in all material respects, with the direct and material compliance requirements identified above in connection with federal awards except as disclosed in the Schedule of Findings and Questioned Costs.
 - c. Identified and disclosed interpretations of any compliance requirements that have varying interpretations.
 - d. Made available all federal awards (including amendments, if any) and any other correspondence relevant to federal programs and related activities that have taken place with federal agencies or pass-through entities. Management has made available all documentation related to compliance with the direct and material compliance requirements, including information related to federal program financial reports and claims for advances and reimbursements. Federal financial reports and claims for advances and reimbursements are supported by the books and records from which the financial statements have been prepared and are prepared on a basis consistent with that presented in the Schedule of Expenditures of Federal Awards. The copies of federal program financial reports provided are true copies of the reports submitted, or electronically transmitted, to the federal agency or pass-through entity, as applicable.
 - e. Identified and disclosed all amounts questioned and any known noncompliance with the direct and material compliance requirements of federal awards, including the results of other audits, program reviews, or any communications from federal awarding agencies and pass-through entities concerning possible noncompliance related to the objectives of the audit.
 - f. Identified previous financial audits, attestation engagements, performance audits, or other studies related to the objectives of the audit and the corrective actions taken to address significant findings and recommendations, including the status of follow-up on prior audit findings (and information about all management decisions) by federal awarding agencies and pass-through entities.

- g. Provided to you our views on the reported findings, conclusions, and recommendations for your report.
 - h. Monitored subrecipients to determine that they have expended subawards in compliance with federal statutes, regulations, and terms and conditions of the sub-award and have met the other pass-through entity requirements of OMB Uniform Guidance.
 - i. Issued management decisions for audit findings that relate to federal awards made to subrecipients. Such management decisions were issued within six months of acceptance of the audit report by the FAC. Additionally, we have followed up to determine whether the subrecipient has taken timely and appropriate action on all deficiencies detected through audits, on-site reviews, and other means that pertain to the federal award provided to the subrecipient from the Government.
 - j. Considered the results of the subrecipient's audits and made any necessary adjustments to the auditee's own books and records.
26. We are responsible for follow-up on all prior-year(s) findings. We have prepared a summary schedule of prior-year findings reporting the status of our efforts in implementation of the prior-year's corrective action plan. The summary schedule of prior audit findings includes all findings required to be included in accordance with OMB Uniform Guidance.
 27. We are responsible for taking corrective action on audit findings and have developed a corrective action plan that meets the requirements of OMB Uniform Guidance. We have included in the corrective action plan for current-year findings, the name of the person in our organization responsible for implementation of the actions, the best actions to be taken, and the estimate of a completion date. We have taken timely and appropriate steps to remedy fraud, illegal acts, violations of provisions of contracts or grant agreements, or abuse that you report.
 28. Management has identified and disclosed to you all laws and regulations that have a direct and material effect on the determination of financial statement amounts.
 29. We believe that we have properly identified, reported, and classified each component unit of the Government and each organization that meets the criteria established in GASB Codification Section 2100, *Defining the Financial Reporting Government*. The Public Utilities Commission (PUC) is a related organization under GASB Statement No. 14, *The Financial Reporting Entity*, as amended by GASB Statement No. 39. PUC consists of seven members, all of whom are appointed by the Governor of Guam. The Government's accountability does not extend beyond the appointments. Accordingly, PUC is classified as another stand-alone governmental unit, not a component unit of the Government, and therefore is not part of the financial statements of the Government.
 30. During the year ended September 30, 2020, GASB issued Statement No. 95, *Postponement of the Effective Dates of Certain Authoritative Guidance*, which postpones the effective dates of GASB Statement No. 84, 89, 90, 91, 92 and 93 by one year and GASB Statement No. 87 by 18 months; however, earlier application of the provisions addressed in GASB Statement No. 95 is encouraged and is permitted to the extent specified in each pronouncement as originally issued. In accordance with GASB Statement No. 95, management has elected to postpone implementation of these statements.

31. In January 2017, GASB issued Statement No. 84, Fiduciary Activities. This Statement is to improve guidance regarding the identification of fiduciary activities for accounting and financial reporting purposes and how those activities should be reported. The requirements of this Statement will enhance consistency and comparability by (1) establishing specific criteria for identifying activities that should be reported as fiduciary activities and (2) clarifying whether and how business-type activities should report their fiduciary activities. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 84 will be effective for fiscal year ending September 30, 2021.
32. In June 2017, GASB issued Statement No. 87, Leases. The objective of this Statement is to better meet the information needs of financial statement users by improving accounting and financial reporting for leases by governments. This Statement increases the usefulness of governments' financial statements by requiring recognition of certain lease assets and liabilities for leases that previously were classified as operating leases and as inflows of resources or outflows of resources recognized based on the payment provisions of the contract. Management believes that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 87 will be effective for fiscal year ending September 30, 2022.
33. In June 2018, GASB issued Statement No. 89, Accounting for Interest Cost Incurred Before the End of a Construction Period. The objectives of this Statement are (1) to enhance the relevance and comparability of information about capital assets and the cost of borrowing for a reporting period and (2) to simplify accounting for interest cost incurred before the end of a construction period. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 89 will be effective for fiscal year ending September 30, 2022.
34. In March 2018, GASB issued Statement No. 90, Majority Equity Interests - An Amendment of GASB Statements No. 14 and 61. The primary objectives of this Statement are to improve the consistency and comparability of reporting a government's majority equity interest in a legally separate organization and to improve the relevance of financial statement information for certain component units. It defines a majority equity interest and specifies that a majority equity interest in a legally separate organization should be reported as an investment if a government's holding of the equity interest meets the definition of an investment. A majority equity interest that meets the definition of an investment should be measured using the equity method, unless it is held by a special-purpose government engaged only in fiduciary activities, a fiduciary fund, or an endowment (including permanent and term endowments) or permanent fund. Those governments and funds should measure the majority equity interest at fair value. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 90 will be effective for fiscal year ending September 30, 2021.
35. In May 2019, GASB issued Statement No. 91, Conduit Debt Obligations. The primary objectives of this Statement are to provide a single method of reporting conduit debt obligations by issuers and eliminate diversity in practice associated with (1) commitments extended by issuers, (2) arrangements associated with conduit debt obligations, and (3) related note disclosures. This Statement achieves those objectives by clarifying the existing definition of a conduit debt obligation; establishing that a conduit debt obligation is not a liability of the issuer; establishing standards for accounting and financial reporting of additional commitments and voluntary commitments extended by issuers and arrangements associated with conduit debt obligations; and improving required note disclosures. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. In accordance with GASB Statement No. 95, GASB Statement No. 91 will be effective for fiscal year ending September 30, 2023.

36. In January 2020, GASB issued statement No. 92, Omnibus 2020. The objectives of this Statement are to enhance comparability in accounting and financial reporting and to improve the consistency of authoritative literature by addressing practice issues that have been identified during implementation and application of certain GASB Statements. This Statement addresses a variety of topics and includes specific provisions about the effective date of Statement No. 87, Leases, and Implementation Guide No. 2019-3, Leases, for interim financial reports, the terminology used to refer to derivative instruments and the applicability of certain requirements of Statement No. 84, Fiduciary Activities, to postemployment benefits. The requirements related to the effective date of GASB Statement No. 87 and Implementation Guide 2019-3, reissuance recoveries and terminology used to refer to derivative instruments are effective upon issuance. In accordance with GASB Statement No. 95, the remaining requirements of GASB Statement No. 92 is effective for the fiscal year ending September 30, 2022.
37. In March 2020, GASB issued Statement No. 93, Replacement of Interbank Offered Rates. The primary objective of this statement is to address those and other accounting and financial reporting implications of the replacement of an IBOR. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. Except for paragraphs 11b, 13, and 14, GASB Statement No. 93 will be effective for fiscal year ending September 30, 2021. The requirement in paragraphs 11b, 13, and 14 are effective for fiscal year September 30, 2022.
38. In March 2020, GASB issued Statement No. 94, Public-Private and Public-Public Partnerships and Availability Payment Arrangements. The primary objective of this statement is to improve financial reporting by addressing issues related to public-private and public-public partnership arrangements. This statement also provides guidance for accounting and financial reporting for availability payment arrangements. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. GASB Statement No. 94 will be effective for fiscal year ending September 30, 2023.
39. In May 2020, GASB issued Statement No. 96, Subscription-Based Information Technology Arrangements. This Statement provides guidance on the accounting and financial reporting for subscription-based information technology arrangements (SBITAs) for government end users (governments). This Statement (1) defines a SBITA; (2) establishes that a SBITA results in a right-to-use subscription asset - an intangible asset - and a corresponding subscription liability; (3) provides the capitalization criteria for outlays other than subscription payments, including implementation costs of a SBITA; and (4) requires note disclosures regarding a SBITA. Management does not believe that this statement, upon implementation, will have a material effect on the financial statements. GASB Statement No. 96 will be effective for fiscal year ending September 30, 2023.
40. In June 2020, GASB issued Statement No. 97, Certain Component Unit Criteria, and Accounting and Financial Reporting for Internal Revenue Code Section 457 Deferred Compensation Plans - an amendment of GASB Statements No. 14 and No. 84, and a supersession of GASB Statement No. 32. The primary objectives of this Statement are to (1) increase consistency and comparability related to the reporting of fiduciary component units in circumstances in which a potential component unit does not have a governing board and the primary government performs the duties that a governing board typically would perform; (2) mitigate costs associated with the reporting of certain defined contribution pension plans, defined contribution other postemployment benefit (OPEB) plans, and employee benefit plans other than pension plans or OPEB plans (other employee benefit plans) as fiduciary component units in fiduciary fund financial statements; and (3) enhance the relevance, consistency, and comparability of the accounting and financial reporting for Internal Revenue Code (IRC) Section 457 deferred compensation plans (Section 457 plans) that meet the definition of a pension plan and for benefits provided through those plans. GASB Statement No. 97 will be effective for fiscal year ending September 30, 2022.

Except where otherwise stated below, matters less than \$18,000,000 collectively for the governmental activities, \$4,000,000 collectively for the General Fund, \$3,600,000 collectively for the CARES Act Unemployment Assistance Fund, \$600,000 collectively for the COVID-19 Fund, \$2,600,000 collectively for the Chamorro Lands Fund, \$2,300,000 collectively for the Federal Grants Assistance Fund and the aggregate remaining fund information, and \$1,000,000 for the GDOE Federal Grants Fund are not considered to be exceptions that require disclosure for the purpose of the following representations. This amount is not necessarily indicative of amounts that would require adjustment to, or disclosure in, the basic financial statements.

41. Except as listed in Appendix A, there are no transactions that have not been recorded and reflected in the financial statements.
42. The Government has no plans or intentions that may affect the carrying value or classification of assets and liabilities.
43. Regarding related parties:
 - a. We have disclosed to you the identity of the Government's related parties and all the related party relationships and transactions of which we are aware.
 - b. To the extent applicable, related parties and all related-party relationships and transactions, including sales, purchases, loans, transfers, leasing arrangements, and guarantees (written or oral) have been appropriately identified, properly accounted for, and disclosed in the financial statements.
44. In preparing the financial statements in accordance with GAAP, management uses estimates. All estimates have been disclosed in the financial statements for which known information available prior to the issuance of the financial statements indicates that both of the following criteria are met:
 - a. It is reasonably possible that the estimate of the effect on the financial statements of a condition, situation, or set of circumstances that existed at the date of the financial statements will change in the near term due to one or more future confirming events.
 - b. The effect of the change would be material to the financial statements.
45. Risks associated with concentrations, based on information known to management, that meet all of the following criteria have been disclosed in the financial statements:
 - a. The concentration exists at the date of the financial statements.
 - b. The concentration makes the Government vulnerable to the risk of a near-term severe impact.
 - c. It is at least reasonably possible that the events that could cause the severe impact will occur in the near term.
46. There are no:
 - a. Instances of identified or suspected noncompliance with laws and regulations whose effects should be considered when preparing the financial statements, or other instances that warrant the attention of those charged with governance.
 - b. Known actual or possible litigation and claims whose effects should be considered when preparing the financial statements that have not been disclosed to you and accounted for and disclosed in accordance with GAAP.

- c. Known actual or likely instances of abuse that have occurred that could be quantitatively or qualitatively material to the financial statements.
 - d. Other liabilities or gain or loss contingencies that are required to be accrued or disclosed by GASB Codification Section C50, *Claims and Judgments*, except as discussed in Note 13 to the financial statements.
47. The Government has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral except as discussed in Notes 2, 6 and 13 to the financial statements.
48. The Government has complied with aspects of contractual agreements that may affect the financial statements.
49. No department or agency of the Government has reported a material instance of noncompliance to us.
50. The Government has identified all derivative instruments as defined by GASB Codification Section D40, *Derivative Instruments*, and appropriately recorded and disclosed such derivatives in accordance with GASB Codification Section D40.
51. Other than those described in Note 16 to the financial statements, no events have occurred after September 30, 2020, but before May 29, 2021 the date the financial statements were available to be issued that requires consideration as adjustments to or disclosures in the financial statements.
52. Regarding required supplementary information:
- a. We confirm that we are responsible for the required supplementary information.
 - b. The required supplementary information is measured and presented in accordance with GASB Codification Section 2200, *Comprehensive Annual Financial Report*.
 - c. The methods of measurement and presentation of the supplementary information have not changed from those used in the prior period.
53. Regarding supplementary information:
- a. We are responsible for the preparation and fair presentation of the supplementary information in accordance with GASB Codification Section 2200, *Comprehensive Annual Financial Report*.
 - b. We believe the supplementary information, including its form and content, is fairly presented in accordance with GASB Codification Section 2200, *Comprehensive Annual Financial Report*.
 - c. The methods of measurement and presentation of the supplementary information have not changed from those used in the prior period.
54. Receivables recorded in the financial statements represent valid claims against debtors for sales or other charges arising on or before the balance-sheet date and have been appropriately reduced to their estimated net realizable value.
55. Management of the Government believes that it is in compliance with all significant limitations and restrictions of the 2011 Hotel Occupancy Tax Revenue Bonds, the 2011, 2012, and 2015 Business Privilege Tax Revenue Bonds indentures, the 2016 Series A Limited Obligation (Section 30) Bonds, the 2019 Series A General Obligation Bonds, and the 2014 and 2020 loan agreement covenants as of September 30, 2020.

56. Tax-exempt bonds issued have retained their tax-exempt status.
57. We have disclosed to you all additions or changes to the existing pension and other postretirement benefit plans.
58. We do not plan to make frequent amendments to our pension or other postretirement benefit plans.
59. We have no intention of terminating any of our pension plans or taking any other action that could result in an effective termination or reportable event for any of the plans.
60. Estimated amounts and the actual tax refunds claimed for prior years but not paid at year-end are recorded as tax refunds payable and as a reduction of tax revenue. The provision for tax refunds is evaluated on a regular basis by management and is based upon management's periodic review of tax returns in light of historical experience and the nature and volume of tax returns submitted. In Tax Year 2018, the Tax Cuts and Jobs Act (TCJA) provided for significant changes to tax rules including changes to the Child Tax Credit, Other Dependents Credit, personal exemptions, and standard deductions. The impact of TCJA changes is currently not determinable and, therefore, this evaluation is subjective as it requires estimates that are susceptible to significant revision as more information becomes available. Accordingly, changes to the provision for tax refunds are accounted for on a prospective basis.
61. We have appropriately identified and properly recorded and disclosed in the financial statements all interfund transactions, including repayment terms.
62. Arrangements with financial institutions involving compensating balances or other arrangements involving restrictions on cash balances, line of credit, or similar arrangements have been properly disclosed in the financial statements.
63. Financial instruments with significant individual or group concentration of credit risk have been appropriately identified, properly recorded, and disclosed in the financial statements.
64. We have disclosed to you all new or changes to the existing pension, and other postretirement benefit plans.
65. We believe that the actuarial assumptions and methods used to measure pension liabilities and costs for financial accounting purposes are appropriate in the circumstances. These amounts have been appropriately recognized and displayed as assets, liabilities and, where applicable, deferred inflows, deferred outflows, net position and changes in net position in the financial statements in accordance with GASB Codification Section P20, *Pension Activities - Reporting for Benefits Provided through Trusts that Meet Specified Criteria* and GASB Codification Section P22, *Pension Activities - Reporting for Benefits Not Provided through Trusts That Meet Specified Criteria - Defined Benefit*.
66. We believe that the actuarial assumptions and methods used to measure postretirement liabilities and costs for financial accounting purposes are appropriate in the circumstances. These amounts have been appropriately recognized and displayed as assets, liabilities and, where applicable, net position and changes in net position in the financial statements in accordance with GASB Codification Section P52, *Postemployment Benefits Other than Pensions - Reporting for Benefits Not Provided through Trusts That Meet Specified Criteria - Defined Benefit*.

67. The Government 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. It is the policy of the primary government not to purchase commercial insurance for the risks of loss to which it is exposed. Instead, the Government management believes it is more economical to manage its risks internally. In the event of claim settlements and judgments, the Government reports all of its risk management activities in its General Fund. Claims expenditures and liabilities are reported when it is probable that a loss has occurred and the amount of that loss can be reasonably estimated. These losses include an estimate of claims that have been incurred but not reported. No losses have occurred as a result of these risks in any of the past three fiscal years.
68. We have appropriately identified and properly recorded and disclosed in the financial statements, where applicable, all interfund transactions, including repayment terms.
69. No evidence of fraud, possible irregularities, or dishonesty in fiscal operations of federal programs administered by the Government has been discovered.
70. The GovGuam Retirement Fund (GGRF) initially recorded certain benefit payments as a receivable in the amount of \$137,200,000 and reduced this amount each year by a portion of employer contributions received. For the year ended September 30, 2020, the statutory contribution rate for the DB Plan is 26.28% of covered payroll, of which 1.2016% was used to reduce this receivable. In the opinion of management of the Government, the corresponding liability is embodied within the governmental activities net pension obligation of \$1,054,836,233. Thus, no separate corresponding liability is required to be recorded. Accordingly, management of the Government considers that this amount represents a consumption of net position that applies to a future period and, as a result, revised the GGRF financial statements by reclassifying this receivable of \$8,097,077 as a deferred outflows of resources.
71. Other long-term liabilities include an amount due to the Internal Revenue Service (IRS) for excess Make Work Pay Credit payments received under the American Recovery and Reinvestment Act of 2009. In accordance with an agreement between the Government and the IRS, the amount due was renegotiated in the amount of \$19,937,926. The Government has yet to finalize repayment terms and conditions with the IRS.
72. Regarding tax revenue abatement agreements, in accordance with GASB Codification Section 2300.107, *Notes to the Financial Statements*, we have disclosed to you all:
- a. Agreements that are entered into by the Government; and
 - b. Agreements that are entered into by other governments and that reduce the Government's tax revenues.

Very truly yours,


 Edward M. Bira
 Director


 Mary Grace V. Edrosa
 Acting Controller

Government of Guam
Appendix A
Summary of Uncorrected Misstatements
September 30, 2020

GENERAL FUND Current Year Misstatements		Balance Sheet		Income Statement
Entry Description	Type of Entry	Assets	Liabilities	Expenditures (Income)
1) To adjust misstatement of ACTC tax receivable/tax provision CR. ACTC tax receivable DR. Tax provision DR. Tax Revenue	Factual Factual Factual	(2,044,100)	(718,636)	2,762,736
2) To correct overstatement of prepayments DR. Lease payments CR. Deposits	Factual Factual	(4,572,367)		4,572,367
3) To correct understatement of revenues (GPD, C&Q, DEA, NOAA) DR. Liabilities CR. Revenues	Factual Factual		2,390,481	(2,390,481)
4) To correctly record Bus Service Revenues DR. Other liabilities and accruals CR. Revenues-Charges	Factual Factual		1,291,386	(1,291,386)
5) To adjust for unreleased checks DR. Cash CR. Accounts payable	Factual Factual	4,126,871	(4,126,871)	
6) To adjust accrued liabilities - old balances DR. Other liabilities and accruals CR. Revenues	Factual Factual		1,973,959	(1,973,959)
7) To recognize unrecorded liabilities DR. Expenditures CR. Accruals	Extrapolated Extrapolated		(2,572,033)	2,572,033
8) To accrue DOC liabilities for GMHA DR. Accounts receivable DR. Expenditures CR. Liabilities	Factual Factual Factual	810,000	(2,400,025)	1,590,025
9) To recognize Census grant payable DR. Revenues CR. Deferred revenues	Factual Factual		(2,568,162)	2,568,162
10) To record claims payable DR. Expenditures CR. Liabilities	Factual Factual		(1,979,008)	1,979,008
11) To reduce GASB33 accrual DR. Tax revenues CR. Accounts receivable	Factual Factual	(1,191,822)		1,191,822
		(2,871,418)	(8,708,909)	11,580,327
FEDERAL GRANTS ASSISTANCE FUND Current Year Misstatements		Balance Sheet		Income Statement
Entry Description	Type of Entry	Assets	Liabilities	Expenditures (Income)
1) To report federal collections from Guam Election Commission DR. Cash CR. Deferred revenues	Factual Factual	975,154	(975,154)	-
		975,154	(975,154)	-

Government of Guam
Appendix A
Summary of Uncorrected Misstatements
September 30, 2020

CARES ACT UNEMPLOYMENT ASSISTANCE FUND		Balance Sheet		Income Statement
Current Year Misstatements		Assets	Liabilities	Expenditures (Income)
Entry Description	Type of Entry			
To record overpayment of unemployment benefits	Extrapolated			2,342,898
DR. Revenues	Extrapolated			(2,342,898)
CR. Expenditures		-	-	-
COVID-19 FUND		Balance Sheet		Income Statement
Current Year Misstatements		Assets	Liabilities	Expenditures (Income)
Entry Description	Type of Entry			
To adjust payroll accrual	Factual			(821,375)
DR. Expenditures	Factual		821,375	
CR. Accrued payroll	Factual			821,375
DR. Revenue	Factual			
CR. Deferred revenue	Factual		(821,375)	
		-	-	-
OTHER GOVERNMENTAL FUNDS		Balance Sheet		Income Statement
Current Year Misstatements		Assets	Liabilities	Expenditures (Income)
Entry Description	Type of Entry			
To record C&Q lease	Factual			1,076,228
DR. Expenditures	Factual		(1,076,228)	
CR. Accounts payable		-	(1,076,228)	1,076,228
GOVERNMENT WIDE		Balance Sheet		Income Statement
Current Year Misstatements		Assets	Liabilities	Expenditures (Income)
Entry Description	Type of Entry			
General Fund		(2,871,418)	(8,708,909)	11,580,327
Federal Grants Assistance Fund		975,154	(975,154)	-
CARES Act Unemployment Assistance Fund		-	-	-
COVID-19 Fund		-	-	-
Other Governmental Funds		-	(1,076,228)	1,076,228
To adjust OPEB liability and deferred outflows related to OPEB	Judgmental	5,076,383		1,478,588
DR. Deferred outflows - OPEB	Judgmental			
DR. OPEB expense	Judgmental		(6,554,971)	
CR. OPEB liability	Judgmental			
To adjust net pension liability to include Gov, Lt Gov, Judges	Factual			5,866,717
DR. Pension expense	Factual		(5,866,717)	
CR. Net pension liability	Factual			
To adjust for understatement of CWIP additions	Factual	4,931,996		(4,931,996)
DR. CWIP	Factual			
CR. Expenditures	Factual			
		8,112,115	(23,181,979)	15,069,864

**Government of Guam
Appendix B
Summary of Disclosure Items Passed
September 30, 2020**

Footnote Number	Footnote Title	Description of Omitted or Unclear Disclosure	Authoritative Literature Reference	Dollar Amount of Omitted or Unclear Disclosure
#13	Commitments and Contingencies	Expenditures exceeding appropriations within the General Fund and were not funded by legislative authorization. 1) Indirect Cost Fund - \$1,370,500 2) Tourist Attraction Fund - \$7,666,613 3) Medically Indigent Program Payment Revolving Fund - \$9,359,999	GASB Statement No. 56 Codification of Accounting and Financial Reporting Section 2300-Notes to Financial Statements	\$ 18,397,112