February 24, 2021

Chris Rath, Chairperson
Village of Sholes
56187 Sholes Terrace
Randolph, NE 68771

Dear Chairperson Rath:

The Nebraska Auditor of Public Accounts (APA) has reviewed the audit waiver request received from the Village of Sholes (Village) for the fiscal year ending 2020. **That request has been approved.**

While performing, pursuant to Neb. Rev. Stat. § 84-304 (Cum. Supp. 2020), the preliminary examination necessary to determine whether the audit waiver should be allowed or further audit work would be required, the APA noted certain internal control or compliance matters, or other operational issues, within the Village.

The following information is intended to improve internal controls or result in other operational efficiencies.

**Comment and Recommendation**

**Lack of Claim Purpose**

During our comparison of the Village’s bank account details to claims approved by the Board, the APA noted that the claims listed in the Board’s official proceedings lacked descriptions of their respective purposes.

The following is an example of the approved claims listing provided by the Village for September 8, 2020:

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On motion the following bills were allowed:
    Arts Garbage Service $108.00
    Northeast Public Power $114.00
    Northeast Nebraska News $184.36
    Morrow, Davies, Toelle & Assoc. $500.00
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Neb. Rev. Stat. § 19-1102 (Cum. Supp. 2020) requires publication of the Board’s official proceedings, which must include, among other things, the purpose of each claim allowed, as follows:

> It shall be the duty of each city clerk or village clerk in every city or village having a population of not more than one hundred thousand inhabitants as determined by the most recent federal decennial census or the most recent revised certified count by the United States Bureau of the Census to prepare and publish the official proceedings of the city council or village board of trustees within thirty days after any meeting of the city council or village board of trustees. The publication shall be in a legal newspaper in or of general circulation in the city or village, shall set forth a
statement of the proceedings of the meeting, and shall also include the amount of each claim allowed, the purpose of
the claim, and the name of the claimant, except that the aggregate amount of all payroll claims may be included as
one item. Between July 15 and August 15 of each year, the employee job titles and the current annual, monthly, or
hourly salaries corresponding to such job titles shall be published. Each job title published shall be descriptive and
indicative of the duties and functions of the position. The charge for the publication shall not exceed the rates provided
for in section 23-122.

(Emphasis added.) Good internal control and sound accounting practices require procedures to ensure that the
Board’s official proceedings describe the purpose of each claim allowed. Without such procedures, there is an
increased risk of not only failure to comply with statutory publication requirements but also a lack of transparency
regarding the nature of public expenditures.

We recommend the Board implement procedures to ensure the purpose of each
claim allowed is included in the Board’s official proceedings and published in
accordance with State statute.

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The preliminary planning work that resulted in this letter was designed primarily on a test basis and, therefore,
may not bring to light all existing weaknesses in the Village’s policies or procedures. Nevertheless, our objective
is to use the knowledge gained during the performance of that preliminary planning work to make comments and
suggestions that we hope will prove useful to the Village.

This communication is intended solely for the information and use of the Village and its management. It is not
intended to be, and should not be, used by anyone other than those specified parties. However, this letter is a
matter of public record, and its distribution is not limited.

If you have any questions, please contact Dakota Christensen at 402-499-8702 or dakota.christensen
@nebraska.gov.

Sincerely,

Mark Avery, CPA
Assistant Deputy Auditor