#### STATE OF ILLINOIS DEPARTMENT OF NATURAL RESOURCES

#### FINANCIAL AUDIT OF CAPITAL ASSET ACCOUNT For the Year Ended June 30, 2018

Performed as Special Assistant Auditors for the Auditor General, State of Illinois

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#### **AGENCY OFFICIALS**

Director	Wayne Rosenthal
Assistant Director (1/1/18 – Present)	Rich Brauer
Deputy Director (10/1/18 – Present)	Eric Lohrenz
Chief of Staff (7/1/18 – Present)	Brad Carlson
Chief of Staff (7/1/16 – 6/30/18)	Brent Krebs
Deputy Chief of Staff (3/1/17 – Present)	Steve Ettinger
General Counsel/Legal (10/1/18 – Present)	Renee Snow
General Counsel/Legal (8/16/17 – 9/30/18)	Eric Lohrenz
General Counsel/Legal (9/1/16 – 8/2/17)	Gabe Grosboll
General Counsel/Legal (7/1/16 – 8/31/16)	Vacant
Chief Fiscal Officer	Doug Florence
Chief Information Officer (1/1/17 – Present)	Steve Washko
Chief Information Officer (11/1/17 – 12/31/16)	Vacant
Chief Information Officer (7/1/16 – 10/31/16)	Don Bricker
Chief Internal Auditor (7/1/18 – Present)	Jeff Beals
Chief Internal Auditor (7/1/16 – 6/30/18)	Brad Colantino
GAAP Coordinator	Rebecca Wilson
Property Control (12/16/16 – Present)	Kami Windisch
Property Control (7/1/16 – 12/15/16)	Kim Clark
Office Director – Legislation (7/1/18 – Present)	Vacant
Office Director – Legislation (7/1/17 – 6/30/18)	Brad Carlson
Office Director – Legislation (7/1/16 – 6/30/17)	Michael Stevens
Office Director – Architecture, Engineering & Grants	Bob Appleman
Office Director – Land Management (3/1/17 – Present)	Regan Ramsey
Office Director – Land Management (7/1/16 – 2/28/17)	Todd Rettig

#### **AGENCY OFFICIALS (continued)**

Office Director – Law Enforcement	Rafael Gutierrez
Office Director – Mines & Minerals (5/1/17 – Present)	Tom Brenner
Office Director – Mines & Minerals (7/1/16 – 4/30/17)	James Hafliger
Office Director – Oil & Gas Management	Mike Mankowski
Office Director – Realty & Environmental Planning	Connie Waggoner
Office Director – Resource Conservation (10/16/16 – Present)	Chris Young
Office Director – Resource Conservation (7/1/16 – 10/15/16)	James Herkert
Illinois State Museum Director (Acting) (1/1/18 – Present) Illinois State Museum Director (Acting) (7/1/16 – 12/31/17)	Robert Sill Michael Wiant
Office Director – Strategic Services (4/1/17 – Present)	Jason Emmett
Office Director – Strategic Services (7/1/16 – 3/31/17)	Steve Ettinger
Office Director – Water Resources (1/1/18 – Present)	Loren Wobig
Office Director – Water Resources (7/1/16 – 12/31/17)	Dan Injerd

The Department's headquarters are located at:

One Natural Resources Way Springfield, Illinois 62703-1271

#### FINANCIAL STATEMENT REPORT

#### **SUMMARY**

The audit of the accompanying Schedule of Capital Assets of the State of Illinois, Department of Natural Resources (Department) was performed by E.C. Ortiz & Co., LLP.

Based on their audit, the auditors expressed an unmodified opinion on the Department's Schedule of Capital Assets.

#### **EXIT CONFERENCE**

The Department waived an exit conference in a correspondence from Rebecca Wilson, Audit Liaison, on November 27, 2018. The response to the recommendation was provided by Rebecca Wilson, Audit Liaison, in a correspondence dated December 11, 2018.



#### **Independent Auditor's Report**

Honorable Frank J. Mautino Auditor General State of Illinois

#### **Report on the Financial Statements**

As Special Assistant Auditors for the Auditor General, we have audited the accompanying Schedule of Capital Assets (Schedule) of the State of Illinois, Department of Natural Resources, as of June 30, 2018, and the related notes to the Schedule, as listed in the table of contents.

#### Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of the Schedule in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the Schedule that is free from material misstatement, whether due to fraud or error.

#### Auditors' Responsibility

Our responsibility is to express an opinion on the Schedule based on our audit. We conducted our 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 we plan and perform the audit to obtain reasonable assurance about whether the Schedule is free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the Schedule. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the Schedule, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the Schedule in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the Schedule.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

#### **Opinion**

In our opinion, the Schedule referred to above presents fairly, in all material respects, the Capital Asset Account of the State of Illinois, Department of Natural Resources, as of June 30, 2018, in accordance with accounting principles generally accepted in the United States of America.

#### **Emphasis of Matter**

As discussed in Note 2, the Schedule and its related footnotes are intended to present the financial position and the changes in financial position of only the Capital Asset Account of the State of Illinois, Department of Natural Resources. The Schedule does not purport to, and does not, present fairly the financial position of the State of Illinois or the State of Illinois, Department of Natural Resources as of June 30, 2018, and the changes in either entity's financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

#### Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated December 11, 2018, on our consideration of the State of Illinois, Department of Natural Resources' internal control over financial reporting of the Schedule and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters as they relate to the Schedule. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the State of Illinois, Department of Natural Resources' internal control over financial reporting of the Schedule or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the State of Illinois, Department of Natural Resources' internal control over financial reporting of the Schedule and its compliance.

#### **Restricted Use of this Auditor's Report**

This report is intended solely for the information and use of the Auditor General, the General Assembly, the Legislative Audit Commission, the Governor, the Comptroller, and Department management and is not intended to be and should not be used by anyone other than these specified parties.

#### SIGNED ORIGINAL ON FILE

Chicago, Illinois December 11, 2018

## STATE OF ILLINOIS DEPARTMENT OF NATURAL RESOURCES SCHEDULE OF CAPITAL ASSETS June 30, 2018

	AMOUNTS
	(in thousands)
Capital Assets not being depreciated:	<del></del>
Land and land improvements	\$ 412,131
Construction in progress	2,303
Internally generated intangible assets in development	372
Easements/rights of way/water-timber-mineral rights	136,184
Total Capital Assets not being depreciated:	550,990
Capital Assets being depreciated:	
Site improvements	539,851
Building and building improvements	291,788
Equipment	73,035
Capital leases - equipment	80
Infrastructure	63,847
Non-internally generated software	36
Internally generated software	3,360
Easements/rights of way/water-timber-mineral rights	1,511
Other intangible assets	6,939
Total Capital Assets being depreciated:	980,447
Less Accumulated Depreciation for:	
Site improvements	388,340
Building and building improvements	205,130
Equipment	59,780
Capital leases - equipment	38
Infrastructure	38,902
Non-internally generated software	36
Internally generated software	3,360
Easements/rights of way/water-timber-mineral rights	1,440
Other intangible assets	3,642
Total Accumulated Depreciation	700,668
Total Capital Assets being depreciated, net	279,779
Total Capital Assets, net	\$ 830,769

The accompanying Notes to the Schedule of Capital Assets are an integral part of this schedule.

#### NOTE 1 - DESCRIPTION OF CAPITAL ASSET ACCOUNT

The State of Illinois, Department of Natural Resources (Department) maintains a Capital Asset Account. Capital assets include construction in progress, infrastructure, intangibles, land and land improvements, site improvements, buildings and building improvements, equipment, and all other tangible assets that are used in operations and that have expected useful lives extending beyond a single reporting period.

#### **NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

The Schedule of Capital Assets (Schedule) maintained by the Department has been prepared in accordance with accounting principles generally accepted in the United States of America (GAAP), as prescribed by the Governmental Accounting Standards Board (GASB). To facilitate the understanding of data included in the Schedule, summarized below are the more significant accounting policies.

#### (a) Reporting Entity

As defined by GAAP, the financial reporting entity consists of a primary government, as well as its component units, which are legally separate organizations for which elected officials of the primary government are financially accountable. Financial accountability is defined as:

- (1) Appointment of a voting majority of the component unit's board and either (a) the primary government's ability to impose its will, or (b) the possibility that the component unit will provide a financial benefit to or impose a financial burden on the primary government; or,
- (2) Fiscal dependency on the primary government.

Based upon the required criteria, the Capital Asset Account does not have component units, nor is it a component unit of any other entity. However, because the Capital Asset Account is not legally separate from the State of Illinois (State), it is included in the financial statements of the State. The State's Comprehensive Annual Financial Report may be obtained from the Office of the Comptroller's website (www.illinoiscomptroller.gov) or by writing to the State Comptroller's Office, Financial Reporting Department, 325 West Adams Street, Springfield, Illinois, 62704-1871.

The Schedule presents only the capital assets administered by the Department and does not purport to, and does not, present fairly the financial position of the State or the Department as of June 30, 2018, and changes in its financial position, where applicable, for the year then ended in conformity with accounting principles generally accepted in the United States of America.

#### (b) Basis of Presentation

The Capital Asset Account balances are reported in the State's Comprehensive Annual Financial Report. For its reporting purposes, the Department has presented the Schedule of Capital Assets using a columnar format that presents capital assets, net of accumulated depreciation, as of June 30, 2018.

#### (c) Basis of Accounting

The Capital Asset Account is reported using the economic resources measurement focus and the accrual basis of accounting.

#### (d) Use of Estimates

The preparation of the Schedule of Capital Assets in conformity with GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and accumulated depreciation at the date of the Schedule. Actual results could differ from those estimates.

#### (e) Valuation

Capital assets are reported at cost or estimated historical cost or, if donated, at their acquisition value. Historical costs include the amount paid for the asset and ancillary charges necessary to place the asset into its intended location and condition for use. Assets acquired in various amounts for a single purpose which may not individually meet the capitalization threshold are capitalized if the estimated total of the project exceeds the capitalization threshold.

For capital assets that are depreciated, expenditures that extend the useful lives of capital assets beyond their initial estimated useful lives (preservation costs), improve their efficiency (improvements), or capacity (additions) are capitalized whereas expenditures for repairs and maintenance are expensed.

Capital assets are depreciated using the straight-line method.

#### (f) Capitalization Policies

Capitalization thresholds and the estimated useful lives are as follows:

	Capitalization	Estimated Useful
Capital Asset Category	Threshold	Life (in years)
Land	\$100,000	N/A
Infrastructure	250,000	30
Site Improvements	25,000	30
Buildings	100,000	30
Building Improvements	25,000	30
Equipment	5,000	7
Capital Leases – Equipment	5,000	Varies/depends on
		contract

	Capitalization	Estimated Useful
Intangible Asset Type	Threshold	Life (in years)
Easement other than right of way	\$25,000	Indefinite
indefinite		
Water rights indefinite	25,000	Indefinite
Right of way indefinite	25,000	Indefinite
Software internally generated	1,000,000	3
Software websites	1,000,000	3
Land easements finite	25,000	Varies/depends on
		contract
Software purchased	25,000	3
Conservation land rights finite	25,000	Varies/depends on
		contract
Right of way finite	25,000	Varies/depends on
		contract

#### (g) Infrastructure

The Department maintains infrastructure assets, including waterways, dams, tunnels, and drainage systems.

In the majority of cases, a legal title document was not created when these assets were constructed or placed into service. The Department capitalizes all infrastructure assets supported by purchasing documentation (e.g., contracts, requisitions, purchase orders, payment documents, etc.). In cases where infrastructure assets are jointly developed or constructed by the Department and neighboring states or local municipalities, the

Department capitalizes only those assets which are maintained by the Department and legal title has not been established by another legal entity.

#### (h) Historical Treasures and Works of Art

The Department maintains extensive collections of historical treasures and works of art. Items meeting the following conditions are not capitalized: 1) held for public exhibition, education, or research in furtherance of public service, rather than financial gain; 2) protected, kept unencumbered, cared for, and preserved; and, 3) subject to an organizational policy that requires the proceeds from sales of collection items to be used to acquire other items for collections. All Department historical treasures and works of art meet these conditions and are not capitalized in the Schedule of Capital Assets.

#### (i) Intangible Assets

The Department maintains various types of intangible assets. These assets lack physical substance, are nonfinancial in nature, and have an initial useful life extending beyond a single reporting period. Examples of intangible assets include, but are not limited to, software (both internally generated and non-internally generated), easements and rights of way, and water and land use rights. Intangible assets are capitalized and depreciated based on conventions in the Capitalization Policies table.

#### (i) Construction in Progress

The Department maintains assets that are constructions in progress. This includes costs incurred during construction of assets. Those accumulated costs are held in the Construction in Progress category until such time as the project is determined to be "substantially complete" (i.e. ready for its intended use). At that time, the asset is moved to the proper asset category, capitalized, and depreciated based on conventions listed in the Capitalization Policies table. The Department considers infrastructure and bikeways to be a series of networks and sub-systems. As such, those assets have met the requirement of being ready for intended use, and therefore, are not held in the Construction in Progress category.

#### (k) Networks and Sub-Systems

The Department maintains networks and sub-systems. A network is composed of all assets that provide a particular type of service for the State or an agency. A network of assets may be only one asset that is composed of many components. A sub-system is composed of all assets that make up a portion or segment of a network. Assets acquired in various amounts for a single purpose, which may not individually meet the capitalization threshold, may be capitalized if the estimated total of the project exceeds the capitalization threshold. Also, for capital assets that are depreciated, expenditures that extend the useful lives of capital assets beyond their initial estimated useful lives (preservation costs), improve their efficiency (improvements), or capacity (additions) are capitalized whereas expenditures for repairs and maintenance are expensed.

#### **NOTE 3 - CAPITAL ASSET MANAGEMENT SYSTEM**

The Department maintains a capital asset management system which includes, for all capital assets, the major asset category, description of the asset, date of acquisition, method of acquisition, cost or other value, responsible organizational unit, location of the asset, identification of applicable network or sub-system (for infrastructure assets), estimated life, estimated salvage value, annual accumulated depreciation, and appropriation.

#### **NOTE 4 - REPORTING REQUIREMENTS**

The Department is required to complete and submit the Capital Asset Summary (SCO-538) form, which now includes the SAMS to GAAP Reconciliation for Capital Assets (formerly SCO-537), to the Office of the Comptroller as part of the year-end reporting process related to capital assets. Amounts reported on this forms have been reconciled to the Schedule of Capital Assets.

STATE OF ILLINOIS
DEPARTMENT OF NATURAL RESOURCES
NOTES TO THE SCHEDULE OF CAPITAL ASSETS
For the Year Ended June 30, 2018

# 5. CAPITAL ASSETS

Capital asset activity for the year ended June 30, 2018, was as follows (amounts are in thousands):

	Ba	Balance At							Ba	Balance At
	Jun	June 30, 2017	Ā	Additions	Deletions		Net Transfers	sters	Jun	June 30, 2018
Capital Assets not being depreciated:										
Land and land improvements	S	395,966	S	2,147	\$	557	\$ 14	14,575	S	412,131
Construction in progress		3,045		209	*	827		(124)		2,303
Internally generated intangible assets in development		372		1		ı		ı		372
Easements/rights of way/water-timber-mineral rights		129,151		7,033		1		ı		136,184
Total Capital Assets not being depreciated:		528,534		6,389	1,3	1,384	14	14,451		550,990
Capital Assets being depreciated:										
Site improvements		441,774		845		54	97	7,286		539,851
Building and building improvements		257,388		443		30	33	33,987		291,788
Equipment		68,258		4,832	2,0	2,000	-	1,945		73,035
Capital leases-equipment		85		•		5		•		80
Infrastructure		63,381		466		,		ı		63,847
Non-internally generated software		36		ı		,		ı		36
Internally generated software		3,360		•				ı		3,360
Easements/rights of way/water-timber-mineral rights		1,511		•				•		1,511
Other intangible assets		6,939		ı		ı		ı		6,939
Total Capital Assets being depreciated:		842,732		6,586	2,0	2,089	133	133,218		980,447
Less Accumulated Depreciation for:										
Site improvements		298,194		14,435		32	75	5,743		388,340
Building and building improvements		166,492		7,598		28	31	31,068		205,130
Equipment		57,001		2,937	1,5	1,992	1	1,834		59,780
Capital leases-equipment		23		20		S		1		38
Infrastructure		37,338		1,564		ı		ı		38,902
Non-internally generated software		36		ı		,		1		36
Internally generated software		3,360		ı		,		ı		3,360
Easements/rights of way/water-timber-mineral rights		1,407		33		ı		ı		1,440
Other intangible assets		3,160		482		ı		ı		3,642
Total Accumulated Depreciation		567,011		27,069	2,0	2,057	108	108,645		700,668
Total Capital Assets being depreciated, net		275,721		(20,483)		32	24	24,573		279,779
Total Capital Assets, net	\$	804,255	8	(11,094)	\$ 1,4	1,416	\$ 39	39,024	<b>↔</b>	830,769

### NOTE 6 - CAPITAL ASSETS TRANSFERRED FROM HISTORIC PRESERVATION AGENCY

Pursuant to Executive Order 2017-01, the Historic Preservation Agency (HPA) was abolished and effective July 1, 2017, the powers, duties, functions, responsibilities, records, documents, books, and property, both real and personal, formerly belonging to the HPA were transferred to the newly established Division of Historic Preservation within the Department's Office of Land Management. Total cost of the capital assets transferred from HPA to the Department amounted to \$152.7 million, of which \$147.2 million were capitalized and reported as part of net transfers on the Schedule of Capital Assets.



Independent Auditor's Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards

Honorable Frank J. Mautino Auditor General State of Illinois

As Special Assistant Auditors for the Auditor General, we have audited, in accordance with the 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, the Schedule of Capital Assets of the State of Illinois, Department of Natural Resources, as of June 30, 2018, and the related notes to the Schedule of Capital Assets, and have issued our report thereon dated December 11, 2018.

#### **Internal Control Over Financial Reporting**

In planning and performing our audit of the Schedule of Capital Assets, we considered the State of Illinois, Department of Natural Resources' internal control over financial reporting for the Capital Asset Account (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the Schedule of Capital Assets, but not for the purpose of expressing an opinion on the effectiveness of the State of Illinois, Department of Natural Resources' internal control. Accordingly, we do not express an opinion on the effectiveness of the State of Illinois, Department of Natural Resources' internal control.

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

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control of the Capital Asset Account that we consider to be material weaknesses. We did identify certain deficiencies in internal control, described in the accompanying schedule of findings as item 2018-001 that we consider to be a significant deficiency.

#### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the State of Illinois, Department of Natural Resources' Schedule of Capital Assets is free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of the Schedule of Capital Assets' amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the accompanying schedule of findings as item 2018-001.

#### State of Illinois, Department of Natural Resources' Response to Finding

The State of Illinois, Department of Natural Resources' response to the finding identified in our audit is described in the accompanying schedule of findings. The State of Illinois, Department of Natural Resources' response was not subjected to the auditing procedures applied in the audit of the Schedule of Capital Assets and, accordingly, we express no opinion on the response.

#### **Purpose of this Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the State of Illinois, Department of Natural Resources' internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the State of Illinois, Department of Natural Resources' internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

SIGNED ORIGINAL ON FILE

Chicago, Illinois December 11, 2018

#### SCHEDULE OF FINDINGS – GOVERNMENT AUDITING STANDARDS

2018-001. **Finding** (Inadequate Control and Oversight over Valuation of Intangibles)

The Department of Natural Resources (Department) did not have adequate control and oversight over the valuation of donated intangible assets and the responsibility to value these assets was not clearly assigned to a responsible individual or division.

During testing of capital asset additions during Fiscal Year 2018, we noted the Department received donated conservation easements and dedicated lands for preservation in perpetuity totaling \$7,033,339 from local government units, private individuals, and not-for-profit organizations. The Department then calculated the value of these donated easements and dedicated lands by using land sales information of various counties and an index factor to estimate the current land values, and applied a certain percentage for the encumbrance. In our review of the calculation, we noted the Department did not ensure the Office/Division performing the calculation used updated data. The land sales information used and the index factor were from 2013 and were not updated using recent sales data.

Governmental Accounting Standards Board (GASB) Statement No. 72, Fair Value Measurement and Application (paragraph 79) requires donated capital assets to be recorded at acquisition value. The 2018-2019 GASB Comprehensive Implementation Guide (Question 7.9.4) defines acquisition value as the price that would be paid to acquire an asset with equivalent service potential in an orderly market transaction at the acquisition date. Acquisition value may be calculated from manufacturer's catalog or price quotes in periodicals, recent sales of comparable assets, or other reliable information.

The Fiscal Control and Internal Auditing Act (30 ILCS 10/3001) requires the Department to establish and maintain a system, or systems, of internal fiscal and administrative controls, which shall provide assurance that transfers of assets and resources are properly recorded and accounted for to permit the preparation of accounts and reliable financial and statistical reports and to maintain accountability over the State's resources.

According to the Office of Fiscal Management, the Office of Realty and Environmental Planning is responsible for valuing these types of assets because they have the necessary experience and technical expertise. According to the Office of Realty and Environmental Planning, they did not view these calculations as an official determination of the value; they believed the calculations were simply an audit exercise in prior years.

Inadequate control and oversight over the valuation of intangibles may result in a material misstatement of the capital assets account of the Department and the Statewide Comprehensive Annual Financial Report. (Finding Code No. 2018-001)

#### Recommendation

We recommend Department management clearly identify and assign the responsibility for valuing these assets to the responsible Office/Division. We also recommend the Department periodically revisit these calculations to ensure updated sales data and index factors are used in performing the valuations.

#### **Management Response**

The Department agrees with the recommendation. The Department has identified the Office of Realty and Environmental Planning as being responsible for valuing these types of assets. The Department will periodically revisit the calculations to ensure updated sales data and index factors are used in performing the valuations.