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June 23, 2011

Ms. Justina Langidrik
Secretary of Health
Republic of the Marshall Islands

Dear Ms. Langidrik:

In planning and performing our audit of the financial statements of the Health Care Revenue Fund (the Fund) as of and for the year ended September 30, 2010 (on which we have issued our report dated June 23, 2011), 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, we considered the Fund's internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Fund's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Fund's internal control over financial reporting.

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over financial reporting. However, in connection with our audit, we identified, and included in the attached Appendix I, deficiencies related to the Fund's internal control over financial reporting and other matters as of September 30, 2010 that we wish to bring to your attention.

We have also issued a separate report to the Honorable Amenta Matthew, Minister of Health, also dated June 23, 2011, on our consideration of the Fund's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters.

The definition of a deficiency is also set forth in the attached Appendix I.

A description of the responsibility of management for establishing and maintaining internal control over financial reporting and of the objectives of and inherent limitations of internal control over financial reporting, is set forth in the attached Appendix II and should be read in conjunction with this report.

This report is intended solely for the information and use of the Ministry of Health, management, others within the organization, and the Office of the Auditor General and is not intended to be and should not be used by anyone other than these specified parties.

We will be pleased to discuss the attached comments with you and, if desired, to assist you in implementing any of the suggestions.

We wish to thank the staff and management of the Fund for their cooperation and assistance during the course of this engagement.

Very truly yours,

Deloitte & Touche LLP

## SECTION I –DEFICIENCIES

We identified, and have included below, deficiencies involving the Fund's internal control over financial reporting as of September 30, 2010 that we wish to bring to your attention:

(1) Travel Advances

In accordance with RepMar travel rules and regulations, travelers are required to submit within fifteen days of the end of travel, a travel voucher claim (TVC) to liquidate travel advances. Failure to submit a TVC within the required period results in a payroll deduction.

As of September 30, 2010, 77% of total travel advances have been outstanding for over fifteen days with 63% of the advances outstanding for over a year. We recommend that management take reasonable steps to comply with established travel policies. This matter was discussed in our previous letters for the audits of the Fund for fiscal years 2006 through 2009.

(2) Travel Advances

At September 30, 2010, the travel advance general ledger accounts (A/c #s 2010 and 2011) included credit balances of $2,640, representing possible overpayments to employees. We recommend that travel advance accounts be periodically reconciled.

(3) Receivables

At September 30, 2010, a receivable from RepMar of $20,508 has been outstanding for several years. We recommend that management pursue collection of this receivable. This matter was discussed in our previous letters for the audits of the Fund for fiscal years 2003 through 2009.

(4) Allowance for Doubtful Accounts

Management does not periodically examine receivables to determine collectibility and to assess required allowances. We recommend that management pursue collection of receivables and determine the adequacy of the allowance for doubtful accounts.

(5) Personnel Action Forms and Signed Contracts

Of twenty two (22) employee contracts examined, we noted one employee without an updated personnel action form and another new employee without a signed contract on file. We recommend that management work diligently towards timely update and filing of contracts and personnel action forms and determine that only employees who have valid or current contracts/personnel actions are actually paid.

(6) Account Reconciliation

During the year ended September 30, 2010, we noted that unusual debit/credit balances exist, journal entries are not reviewed, and discrepancies in GL/SL balances exist. We recommend that management to reasonable steps to establish policies and procedures requiring account reconciliations be performed timely and regularly. Further, an appropriate independent review by management personnel other than the preparer should also be implemented. This matter was discussed in our previous letters for the audits of the Fund for fiscal years 2007 through 2009.

(7) RMI Withholding Tax

The Fund did not remit taxes withheld from November 2009 to June 2010 until July 2010. We recommend that timely remittance of taxes withheld to regulatory authorities occur.

(8) Payables

At September 30, 2010, the Fund recorded payables to affiliates of $267,185 and other payables of $9,239 which remain unpaid for over a year. We recommend that the balances be evaluated for appropriate resolution.

(9) Progress Reports

Based on terms and conditions of the TB and HIV Program Grant Agreements, periodic reports shall be submitted not later than 25 days after the end of each reporting period indicating the progress towards Program objectives and targets. However, such reports are not available. We recommend completion and filing of progress reports to document monitoring of program implementation results.

(10) Grant Agreements

Based on the TB and HIV Program Grant Agreements, the Phase 1 term ends on June 30, 2010. A three-month NCE (no cost extension) was approved for Phase 1 which covers the period of July 1, 2010 to September 30, 2010. However, no additional extension was noted to support subsequent disbursements from remaining funds at September 30, 2010. In addition, of eighteen (18) grant revenue samples tested, twelve (12) items do not have available copies of grant notices, contracts or agreements.

We recommend that agreements be obtained and filed to determine the terms and conditions of grant funds for compliance and to support the basis of revenue recognition.

## SECTION II — OTHER MATTERS

Our observations concerning other matters related to operations, compliance with laws and regulations, and best practices involving internal control over financial reporting that we wish to bring to your attention at this time are as follows:

(1) Contract Agreement

The Fund has a deposit of $25,000 with an off-island vendor based on terms of a contract dated February 27, 1998 executed by the vendor and the Marshall Islands Social Security Administration, the Fund's previous administrator. We recommend that management take steps to have this contract updated to reflect the Ministry of Health as the Fund's administrator. This matter was discussed in our previous letters for the audits of the Fund for fiscal years 2008 and 2009.

## SECTION III – DEFINITIONS

The definition of a deficiency that is established in AU 325, *Communicating Internal Control Related Matters Identified in an Audit*, is as follows:

A *deficiency* 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 deficiency in design exists when (a) a control necessary to meet the control objective is missing or (b) an existing control is not properly designed so that, even if the control operates as designed, the control objective would not be met. A deficiency in operation exists when (a) a properly designed control does not operate as designed, or (b) the person performing the control does not possess the necessary authority or competence to perform the control effectively.

## MANAGEMENT'S RESPONSIBILITY FOR, AND THE OBJECTIVES AND LIMITATIONS OF, INTERNAL CONTROL OVER FINANCIAL REPORTING

The following comments concerning management's responsibility for internal control over financial reporting and the objectives and inherent limitations of internal control over financial reporting are adapted from auditing standards generally accepted in the United States of America.

### Management's Responsibility

The Fund's management is responsible for the overall accuracy of the financial statements and their conformity with generally accepted accounting principles. In this regard, management is also responsible for establishing and maintaining effective internal control over financial reporting.

### Objectives of Internal Control over Financial Reporting

Internal control over financial reporting is a process affected by those charged with governance, management, and other personnel and designed to provide reasonable assurance about the achievement of the entity's objectives with regard to reliability of financial reporting, effectiveness and efficiency of operations, and compliance with applicable laws and regulations. Internal control over the safeguarding of assets against unauthorized acquisition, use, or disposition may include controls related to financial reporting and operations objectives. Generally, controls that are relevant to an audit of financial statements are those that pertain to the entity's objective of reliable financial reporting (i.e., the preparation of reliable financial statements that are fairly presented in conformity with generally accepted accounting principles).

### Inherent Limitations of Internal Control over Financial Reporting

Because of the inherent limitations of internal control over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may not be prevented or detected on a timely basis. Also, projections of any evaluation of the effectiveness of the internal control over financial reporting to future periods are subject to the risk that the controls may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.