

**Rockland County Solid Waste
Management Authority**

Communication to Those Charged With Governance
December 31, 2024



March 13, 2025

Board of Directors
Rockland County Solid Waste Management Authority
172 Main Street
Nanuet, NY 10954

Dear Members of the Board:

We are pleased to present this report related to our audit of the basic financial statements of the Rockland County Solid Waste Management Authority (Authority) as of and for the year ended December 31, 2024. This report summarizes certain matters required by professional standards to be communicated to you in your oversight responsibility for the Authority's financial reporting process.

This report is intended solely for the information and use of the Board of Directors and management, and is not intended to be, and should not be, used by anyone other than these specified parties. It will be our pleasure to respond to any questions you have about this report. We appreciate the opportunity to continue to be of service to the Authority.

Very truly yours,

BST & Co. CPAs, LLP

A handwritten signature in black ink, appearing to read 'Ann D. DeLucco'.

Ann D. DeLucco, Partner

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REQUIRED COMMUNICATIONS

The following required communications summarize our responsibilities regarding the financial statement audit as well as observations arising from our audit that are significant and relevant to your responsibility to oversee the financial and related compliance reporting process.

Our Responsibilities

We describe our responsibilities under auditing standards generally accepted in the United States of America and *Government Auditing Standards* issued by the Comptroller General of the United States to you in our engagement letter dated August 5, 2024. Our audit of the basic financial statements does not relieve management or you of your responsibilities, which are also described in that letter.

Planned Scope and Timing of the Audit

We have previously issued a separate communication dated January 22, 2025 regarding the planned scope and timing of our audit and identified significant risks.

Accounting Policies and Practices

Preferability of Accounting Policies and Practices

Under generally accepted accounting principles, in certain circumstances, management may select among alternative accounting practices. In our view, in such circumstances, management has selected the preferable accounting practice.

Adoption of, or Change in, Accounting Policies

Management has the ultimate responsibility for the appropriateness of the accounting policies used by the Authority. Effective January 1, 2024, the Authority adopted the provisions of GASB 101, *Compensated Absences*. This standard clarified the definition of paid leave and when it should be accrued. The standard did not have a material effect on the financial statements.

Significant Accounting Policies

We did not identify any significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus.

Significant Unusual Transactions

We did not identify any significant unusual transactions.

Management's Judgments and Accounting Estimates

Summary information about the process used by management in formulating particularly sensitive accounting estimates and about our conclusions regarding the reasonableness of those estimates is in the Summary of Significant Accounting Estimates.



REQUIRED COMMUNICATIONS (CONTINUED)

Audit Adjustments and Uncorrected Misstatements

There were no audit adjustments made to the original trial balance presented to us to begin our audit.

Uncorrected misstatements are summarized in the attached list of Uncorrected Misstatements. Uncorrected misstatements or matters underlying these uncorrected misstatements could potentially cause future-period financial statements to be materially misstated, even if we have concluded that the uncorrected misstatements are immaterial to the financial statements under audit.

Observations About the Audit Process

Disagreements With Management

We encountered no disagreements with management over the application of significant accounting principles, the basis for management's judgments on any significant matters, the scope of the audit, or significant disclosures to be included in the basic financial statements.

Consultations With Other Accountants

We are not aware of any consultations management had with other accountants about accounting or auditing matters.

Significant Issues Discussed With Management

Following are descriptions of significant items arising from the audit that were discussed with management:

- Construction and completion of the Materials Recycling Facility.
- Expansion of services to protection and promotion of animal care and related accounting treatment.

Significant Difficulties Encountered in Performing the Audit

We did not encounter any significant difficulties in dealing with management during the audit.

Significant Matters That Required Consultation

We did not encounter any difficult or contentious matters that required consultation outside the engagement team and that are, in our professional judgment, significant and relevant to your responsibility to oversee the financial reporting process.

Shared Responsibilities for Independence

Independence is a joint responsibility and managed most effectively when management, audit committees, and audit firms work together in considering compliance with AICPA and Government Accountability Office (GAO) independence rules. For BST to fulfill its professional responsibility to maintain and monitor independence, management, the audit committee, and BST each play an important role.



REQUIRED COMMUNICATIONS (CONTINUED)

Our Responsibilities

- AICPA and GAO rules require independence, both of mind and in appearance, when providing audit and other attestation services. BST is to ensure that the AICPA's and the GAO's General Requirements for performing non-attest services are adhered to and included in all letters of engagement.

The Authority's Responsibilities

- Timely inform BST, before the effective date of transactions or other business changes, of the following:
 - New affiliates, directors, officers, or people in financial reporting and compliance oversight roles.
 - Changes in the reporting entity impacting affiliates, such as partnerships, related entities, investments, or joint ventures.
- Provide necessary affiliate information, such as new or updated structure charts, as well as financial information required to perform materiality calculations needed for making affiliate determinations.
- Understand and conclude on the permissibility prior to the Authority and its affiliates, officers, directors, or people in a decision-making capacity engaging in business relationships with BST.
- Not entering into arrangements of non-audit services resulting in BST being involved in making management decisions on behalf of the Authority.
- Not entering into relationships resulting in BST, BST-covered people or their close family members temporarily or permanently acting as an officer, director, or person in an accounting, financial reporting, or compliance oversight role at the Authority.

Significant Written Communications Between Management and Our Firm

A copy of significant written communications between our firm and the management of the Authority, specifically the representation letter provided to us by management, is attached as Exhibit A.



SIGNIFICANT ACCOUNTING ESTIMATES

Accounting estimates are an integral part of the preparation of financial statements and are based upon management's current judgment. The process used by management encompasses its knowledge and experience about past and current events and certain assumptions about future events. You may wish to monitor throughout the year the process used to determine and record these accounting estimates. The following describes the significant accounting estimates reflected in the Authority's December 31, 2024 basic financial statements:

Significant Accounting Estimates

Accrued Postemployment Benefits

Accounting Policy

Management provides an accrual for postemployment benefits related to health insurance coverage for certain retirees. The accrual is based on an actuary's estimate of these obligations. These estimates are subject to revision based on changes in actuarial assumptions, including retirement age, mortality, turnover, health care cost trends, discount rate, and/or other circumstances.

Management's Estimation Process

Management receives an estimate of these liabilities from an independent actuary and reviews these estimates for reasonableness.

Net Pension Liability

Accounting Policy

The Authority recognizes its proportionate share of the New York State and Local Employees' Retirement System net pension liability.

Management's Estimation Process

The Authority's net pension liability is estimated by the New York State Office of the State Comptroller using census data supplied by participating employers and various actuarial assumptions, including, but not limited to, rate of return, mortality, and inflation. The Authority's proportionate percentage of the net pension liability is determined on an annual basis.

We have evaluated management's significant accounting estimates noted above as part of our audit and concluded that management's estimates and the estimation process appear reasonable in the context of the basic financial statements taken as a whole.



UNCORRECTED MISSTATEMENTS

We identified the following uncorrected misstatement that management has concluded is not material to the financial statements. We agree with management's conclusion in that regard.

Description	Effect - Increase (Decrease)				
	Assets	Liabilities	Net Position	Revenue	Expense
To accrue sick time related to GASB Statement No. 101	\$ -	\$ 150,000	\$ -	\$ -	\$ 150,000
Total change in net position effect			(150,000)	\$ -	\$ 150,000
Statement of net position effect	\$ -	\$ 150,000	\$ (150,000)		



Exhibit A

Significant Written Communications Between Management and Our Firm

Representation Letter



March 13, 2025

BST & Co. CPAs, LLP
10 British American Blvd.
Latham, New York 12110

This representation letter is provided in connection with your audits of the basic financial statements of the Rockland County Solid Waste Management Authority (Authority), a component unit of the County of Rockland, New York (County), as of and for the years ended December 31, 2024 and 2023 for the purpose of expressing an opinion on whether the financial statements are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP).

We confirm, to the best of our knowledge and belief, that as of March 13, 2025:

Financial Statements

1. We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated August 5, 2024, for the preparation and fair presentation of the financial statements referred to above in accordance with U.S. GAAP.
2. We acknowledge our responsibility for 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.
3. We acknowledge our responsibility for the design, implementation and maintenance of controls to prevent and detect fraud.
4. The methods, data, and significant assumptions used by us in making accounting estimates and their related disclosures are appropriate to achieve recognition, measurement, or disclosure that is reasonable in the context of U.S. GAAP, and reflect our judgment based on our knowledge and experience about past and current events, and our assumptions about conditions we expect to exist and courses of action we expect to take.
5. The methods, assumptions and data used to estimate the allowance for uncollectible accounts, landfill post closure liability, proportionate share of the net pension liability (NPL) and the other postemployment benefits liability (OPEB), as described in the financial statements, result in estimates that are appropriate for financial statement measurement and disclosure purposes and have been consistently selected and applied in making the estimate. Significant judgments made in making the estimate have taken into account all relevant information of which we are aware. Appropriate specialized skills or expertise has been applied in making the estimate. All disclosures related to the estimates, including disclosures describing estimation uncertainty, are complete and reasonable in the context of U.S. GAAP. No subsequent events have occurred that would require adjustment to the estimate and related disclosures included in the financial statements.
6. Related-party transactions have been recorded in accordance with the economic substance of the transaction and appropriately accounted for and disclosed in accordance with the requirements of U.S. GAAP.

7. All events subsequent to the date of the financial statements, and for which U.S. GAAP requires adjustment or disclosure, have been adjusted or disclosed.
8. The effects of all known actual or possible litigation and claims have been accounted for and disclosed in accordance with U.S. GAAP.
9. Management has followed applicable laws and regulations in adopting, approving and amending budgets.
10. Risk disclosures associated with deposit and investment securities and derivative transactions are presented in accordance with GASB requirements.
11. Provisions for uncollectible receivables have been properly identified and recorded.
12. Capital assets and right of use assets are properly capitalized, reported and, if applicable, depreciated.
13. The government properly separated information in debt disclosures related to direct borrowings and direct placements of debt from other debt and disclosed any unused lines of credit, collateral pledged to secure debt, terms in the debt agreements related to significant default or termination events with finance-related consequences and significant subjective acceleration clauses in accordance with GASB Statement No. 88, *Certain Disclosures Related to Debt, including Direct Borrowings and Direct Placements*.
14. Components of net position (net investment in capital assets, restricted, and unrestricted) are properly classified and, if applicable, approved.
15. The Authority'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.
16. In the audit engagement letter dated August 5, 2024, we requested that you perform the nonaudit service of drafting the financial statements.

With respect to this service:

- a. We have made all management decisions and performed all management functions;
 - b. We assigned an appropriate individual to oversee the services;
 - c. We evaluated the adequacy and results of the services performed, and made an informed judgment on the results of the services performed;
 - d. We have accepted responsibility for the results of the services; and
 - e. We have accepted responsibility for all significant judgments and decisions that were made.
17. We have no direct or indirect legal or moral obligation for any debt of any organization, public or private, that is not disclosed in the financial statements.
 18. We have complied with all aspects of laws, regulations and provisions of contracts and agreements that would have a material effect on the financial statements in the event of noncompliance. In connection therewith, we specifically represent that we are responsible for determining that we are not subject to the requirements of the Single Audit Act because we have not received, expended or

otherwise been the beneficiary of the requirement amount of federal awards during the period of this audit.

19. We have reviewed the GASB Statements effective for the fiscal year ending December 31, 2024, and concluded the implementation of the following Statements did not have a material impact on the basic financial statements:

a. GASB Statement No. 101, *Compensated Absences*

20. We have informed you of all uncorrected misstatements.

21. As of and for the year ended December 31, 2024, we believe that the effects of the uncorrected misstatements aggregated by you and summarized below are quantitatively and qualitatively immaterial, both individually and in the aggregate, to the basic financial statements. For purposes of this representation, we consider items to be material, regardless of their size, if they involve the misstatement or omission 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.

Description	Effect - Increase (Decrease)				
	Assets	Liabilities	Net Position	Revenue	Expense
To accrue sick time related to GASB Statement No. 101	\$ -	\$ 150,000	\$ -	\$ -	\$ 150,000
Total change in net position effect			(150,000)	\$ -	\$ 150,000
Statement of net position effect	\$ -	\$ 150,000	\$ (150,000)		

22. We have requested an unsecured electronic copy of the auditor's report and basic financial statements and agree that the auditor's report and basic financial statements will not be modified in any manner.

Information Provided

23. We have provided you with:

- a. Access to all information of which we are aware that is relevant to the preparation and fair presentation of the basic financial statements such as records, documentation and other matters.
- b. Additional information that you have requested from us for the purpose of the audits.
- c. Unrestricted access to persons within the Authority from whom you determined it necessary to obtain audit evidence.
- d. Minutes of the meetings of the governing board and committees, or summaries of actions of recent meetings for which minutes have not yet been prepared.

24. All transactions have been recorded in the accounting records and are reflected in the basic financial statements.

25. We have disclosed to you the results of our assessment of risk that the basic financial statements may be materially misstated as a result of fraud.

26. We have no knowledge of allegations of fraud or suspected fraud affecting the Authority's basic financial statements involving:
 - a. Management.
 - b. Employees who have significant roles in internal control.
 - c. Others where the fraud could have a material effect on the basic financial statements.
27. We have no knowledge of any allegations of fraud or suspected fraud affecting the Authority's basic financial statements received in communications from employees, former employees, analysts, regulators, or others.
28. We have no knowledge of noncompliance or suspected noncompliance with laws and regulations.
29. We are not aware of any pending or threatened litigation, claims or assessments; unasserted claims or assessments that are probable of assertion and must be disclosed in accordance with Government Accounting Standards Board (GASB) Codification Section C50, Claims and Judgments; or other matters, including gain or loss contingencies, whose effects should be considered when preparing the financial statements.
30. We have disclosed to you the identity of all of the Authority's related parties and all the related-party relationships and transactions of which we are aware.
31. We are aware of no deficiencies in internal control over financial reporting, including significant deficiencies or material weaknesses, in the design or operation of internal controls that could adversely affect the Authority's ability to record, process, summarize and report financial data.
32. There have been no communications from regulatory agencies concerning noncompliance with, or deficiencies in, financial reporting practices.
33. We agree with the findings of the specialists in evaluating NPL and OPEB liabilities and have adequately considered the qualifications of the specialists in determining the amounts and disclosures used in the financial statements and underlying accounting records. We did not give instructions, or cause any instructions to be given, to the specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an impact on the independence or objectivity of the specialists.
34. We believe that the actuarial assumptions and methods used by the actuary for funding purposes and for determining accumulated Plan benefits are appropriate in the circumstances. We did not give instructions, or cause any instructions to be given, to the actuary with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had an impact on the independence or objectivity of the plan's actuary.
35. We believe that the information obtained from the audited financial statements of and other participant information provided by the New York State and Local Retirement System is appropriate in the circumstances. We did not give instructions, or cause any instructions to be given, to the plan or its auditor in an attempt to bias their work, and we are not otherwise aware of any matters that have had an impact on the independence or objectivity of the plan or its auditor.
36. During the course of your audits, you may have accumulated records containing data that should be reflected in our books and records. All such data have been so reflected. Accordingly, copies of such records in your possession are no longer needed by us.

Supplementary Information

37. With respect to supplementary information presented in relation to the basic financial statements as a whole:
 - a. We acknowledge our responsibility for the presentation of such information.
 - b. We believe such information, including its form and content, is fairly presented in accordance with U.S. GAAP.
 - c. The methods of measurement or presentation have not changed from those used in the prior period.
38. With respect to Management's Discussion and Analysis, the schedule of funding progress, the schedule of proportionate share of the net pension liability, and the schedule of local government contributions presented as required by U.S. GAAP to supplement the basic financial statements:
 - a. We acknowledge our responsibility for the presentation of such required supplementary information.
 - b. We believe such required supplementary information is measured and presented in accordance with guidelines prescribed by U.S. GAAP.
 - c. The methods of measurement or presentation have not changed from those used in the prior period.

Compliance Considerations

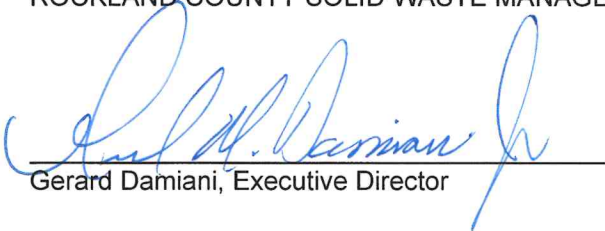
In connection with your audit conducted in accordance with *Government Auditing Standards*, we confirm that management:

39. Is responsible for the preparation and fair presentation of the financial statements in accordance with U.S. GAAP.
40. Is responsible for compliance with the laws, regulations and provisions of contracts and grant agreements applicable to the Authority.
41. Is not aware of any instances of identified and suspected fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements that have a material effect on the financial statements.
42. Is responsible for 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.
43. Acknowledges its responsibility for the design, implementation and maintenance of controls to prevent and detect fraud.
44. Has a process to track the status of audit findings and recommendations.

45. Is not aware of any investigations or legal proceedings that have been initiated with respect to the period under audit

Very truly yours,

ROCKLAND COUNTY SOLID WASTE MANAGEMENT AUTHORITY



Gerard Damiani, Executive Director



Jeremy Goldstein, Director of Finance