



U.S. CONSUMER PRODUCT SAFETY COMMISSION
BETHESDA, MD 20814

Christopher W. Dentel
Inspector General

Tel: 301 504-7644
Fax: 301 504-7004
Email: cdentel@cpsc.gov

Date: December 16, 2013

TO : Robert S. Adler, Acting Chairman
Marietta Robinson, Commissioner
Ann Marie Buerkle, Commissioner

FROM : Christopher W. Dentel, Inspector General

SUBJECT : Audit of the Consumer Product Safety Commission's Fiscal Year 2013
Financial Statements

Pursuant to the Chief Financial Officers Act of 1990, commonly referred to as the "CFO Act," as amended, this letter transmits the Independent Auditor's Report issued by CliftonLarsonAllen (CLA), for the fiscal year ending September 30, 2013. The audit was performed under a contract with, and monitored by, the Office of Inspector General (OIG), in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and applicable provisions of Office of Management and Budget (OMB) Bulletin No. 07-04, *Audit Requirements for Federal Financial Statements*, as amended.

Opinion on the Financial Statements

CLA audited the balance sheet of the Consumer Product Safety Commission (CPSC) as of September 30, 2013, and the related statements of net cost, changes in net position, budgetary resources, and custodial activity (the financial statements) for the year then ended. The objective of the audit was to express an opinion on the fair presentation of those financial statements. In connection with the audit, CLA also considered the CPSC's internal control over financial reporting and tested the CPSC's compliance with certain provisions of applicable laws and regulations that could have a direct and material effect on its financial statements. The financial statements of the CPSC as of September 30, 2012, were not audited by CLA. As part of CLA's audit of the FY 2013 financial statements, they also audited adjustments described in Note 15 of the Financial Statements that were applied to restate the FY 2012 financial statements. In CLA's opinion, such adjustments were appropriate and had been properly applied. CLA was not engaged to audit, review, or apply any procedures to the FY 2012 financial statements of the CPSC other than with respect to the adjustments and, accordingly, they did not express an opinion or any other form of assurance on the FY 2012 financial statements as a whole.

In CLA's opinion, the financial statements present fairly, in all material respects, the financial position, net cost, changes in net position, budgetary resources, and custodial activity of the CPSC as of, and for the year ending September 30, 2013, in conformity with accounting principles generally accepted in the United States of America.

Report on Internal Control

In planning and performing the audit of the financial statements of the CPSC, CLA considered the CPSC's internal control over financial reporting (internal control) as a basis for designing auditing procedures for the purpose of expressing their opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the CPSC's internal control. Accordingly, CLA did not express an opinion on the effectiveness of the CPSC's internal control.

Because of inherent limitations in internal controls, including the possibility of management override of controls; misstatements, losses, or noncompliance may nevertheless occur and not be detected. According to the American Institute of Certified Public Accountants:

- A control 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 misstatements on a timely basis.
- A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is a more than remote likelihood that a misstatement of the entity's financial statements that is more than inconsequential will not be prevented or detected by the entity's internal control.
- A material weakness is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the entity's internal control.

CLA's consideration of internal control was for the limited purpose described in the first paragraph in this section and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. CLA did identify deficiencies in internal control that CLA would consider to be a material weakness, as defined above. This material weakness in internal controls related to the capitalization of leasehold improvements.

CLA found that the CPSC Commission did not have a specific policy in place for recording leasehold improvements and tenant improvement allowances. These disbursements were originally expensed when incurred instead of being recorded as capitalized assets. During fiscal year 2013, the CPSC recorded the appropriate assets and adjustments to cumulative results of operations and posted a prior period adjustment which required the restatement of the fiscal year

2012 financial statements. Due to the material errors that led to the restatement detailed above and in the accompanying audit report, our report on the fiscal year 2012 financial statements, issued on November 16, 2013, is not to be relied upon.

Report on Compliance with Laws and Regulations

CPSC management is responsible for complying with laws and regulations applicable to the agency. To obtain reasonable assurance about whether CPSC's financial statements are free of material misstatements, CLA performed tests of compliance with certain provisions of laws and regulations, noncompliance which could have a direct and material effect on the determination of financial statement amounts, and certain other laws and regulations specified in OMB Bulletin No. 07-04, as amended. CLA did not test compliance with all laws and regulations applicable to the CPSC.

CLA's tests of compliance with laws and regulations described in the audit report disclosed instances of noncompliance with laws and regulations that are required to be reported under U.S. generally accepted government auditing standards or OMB guidance. The CPSC has acknowledged one violation of the Antideficiency Act. In fiscal year 2012, the CPSC exceeded an appropriation limit on Reception and Representation expenses. This violation has been appropriately reported. CLA found that the CPSC had not reported a second potential violation. This violation relates to the use of appropriated funds to pay expenses associated with the CPSC's telework program. An earlier report from the OIG found that this potential violation had in fact occurred and should be reported. The agency has not yet taken final action on the matter.

Audit Follow-up

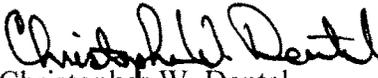
The independent auditor's report contains recommendations to address deficiencies found by the auditors. Management was provided a draft copy of the audit report for comment and generally concurred with some of the findings and recommendations. In accordance with OMB Circular No. A-50, Audit Follow-up, revised, the CPSC is to prepare a corrective action plan that will set forth the specific action planned to implement the agreed upon recommendations and the schedule for implementation. The CPSC has designated the *Chief Financial Officer* to be the audit follow-up official for the financial statement audit.

OIG Evaluation of CliftonLarsonAllen's Audit Performance

We reviewed CLA's report and related documentation and made necessary inquiries of its representatives. Our review, as differentiated from an audit in accordance with generally accepted government auditing standards, was not intended to enable the OIG to express, and we do not express an opinion on the CPSC's financial statements; nor do we provide conclusions about the effectiveness of internal control or conclusions on CPSC's compliance with laws and regulations. CLA is responsible for the attached auditor's report. However, the OIG review disclosed no instances where CLA did not comply, in all material respects, with *Government Auditing Standards*.

Page 4

We appreciate the courtesies and cooperation extended to CLA and the OIG staff during the audit. If you should have any questions concerning this report, please contact my office on (301) 504-7501.


Christopher W. Dentel
Inspector General

Attached: Audit Report



CliftonLarsonAllen

CliftonLarsonAllen LLP
www.cliftonlarsonallen.com

INDEPENDENT AUDITORS' REPORT

Inspector General
Consumer Product Safety Commission

Chairman
Consumer Product Safety Commission

In our audit of the fiscal year (FY) 2013 financial statements of the U.S. Consumer Product Safety Commission (Commission), we found:

- 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.);
- One material weakness and no significant deficiencies in internal control over financial reporting; and
- One instance of reportable noncompliance with certain provisions of laws and regulations tested and one potential instance of reportable noncompliance.

The following sections and Exhibits discuss in more detail: (1) these conclusions, (2) Management's Discussion and Analysis (MD&A) and other information included with the financial statements, (3) management's responsibilities, (4) our responsibilities, (5) management's response to findings, and (6) the current status of prior year findings.

Report on the Financial Statements

We have audited the accompanying financial statements of the Commission, which comprise the balance sheet as of September 30, 2013, and the related statements of net cost, changes in net position, budgetary resources, and custodial activity for the year then ended, and the related notes to the financial statements. The objective of our audits was to express an opinion on the fairness of these financial statements.

Management's Responsibility for the Financial Statements

Commission management is responsible for the (1) preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the U.S., (2) preparation, measurement, and presentation of the required supplementary Information (RSI) in accordance with accounting principles generally accepted in the U.S., (3) preparation and presentation of other information in documents containing the audited financial statements and auditors' report, and consistency of that information with the audited financial statements and the RSI; (4) 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.

INDEPENDENT AUDITORS' REPORT (Continued)

Auditors' Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the U.S. 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 financial statements are free from material misstatement. We also conducted our audits in accordance with Office of Management and Budget (OMB) Bulletin No. 14-02, *Audit Requirements for Federal Financial Statements* (OMB Bulletin 14-02).

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the financial statements, 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 financial statements 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 financial statements.

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

Opinion on the Financial Statements

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the U.S. Consumer Product Safety Commission as of September 30, 2013, and its net costs, changes in net position, budgetary resources, and custodial activity for the year then ended, in accordance with accounting principles generally accepted in the U.S.

Other Matters

2012 Financial Statements

The FY 2012 financial statements were audited by other auditors whose report dated November 16, 2012, expressed an unmodified opinion on those statements. As discussed in Note 15 to the financial statements, errors resulting from not capitalizing and amortizing leasehold improvements were discovered by management during the current year. Accordingly, amounts reported for property and equipment and amortization have been restated in the FY 2012 financial statements, and an adjustment has been made to cumulative results of operations as of September 30, 2011. The other auditors reported on the FY 2012 financial statements before the restatement.

As part of our audit of the FY 2013 financial statements, we also audited adjustments described in Note 15 that were applied to restate the FY 2012 financial statements. In our opinion, such adjustments are appropriate and have been properly applied. We were not engaged to audit, review, or apply any procedures to the FY 2012 financial statements of the Commission other than with respect to the adjustments and, accordingly, we do not express an opinion or any other form of assurance on the FY 2012 financial statements as a whole.

INDEPENDENT AUDITORS' REPORT (Continued)

Required Supplementary Information

Accounting principles generally accepted in the U.S. require that the Commission's MD&A be presented to supplement the financial statements. Such information, although not a part of the financial statements, is required by FASAB, who considers it to be an essential part of financial reporting for placing the financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the MD&A in accordance with auditing standards generally accepted in the U.S., which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the financial statements, and other knowledge we obtained during our audit of the financial statements. We do not express an opinion or provide any assurance on the MD&A because the limited procedures we applied do not provide sufficient evidence to express an opinion or provide any assurance.

Other Information

The Message from the Chairman on page i, and other accompanying information on pages 43 to 50, contain a wide range of information, some of which is not directly related to the financial statements. This information is presented for purposes of additional analysis and is not a required part of the financial statements. The Message from the Chairman and other accompanying information has not been subjected to the auditing procedures applied in the audit of the financial statements, and accordingly, we do not express an opinion or provide any assurance on it.

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

Report on Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Commission's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Commission's internal control or on management's assertion on internal control included in the MD&A. Accordingly, we do not express an opinion on the effectiveness of the Commission's internal control or on management's assertion on internal control included in the MD&A.

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 Commission's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or 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 preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, we identified certain

INDEPENDENT AUDITORS' REPORT (Continued)

deficiencies in internal control, described below and in Exhibit A, that we consider to be a material weakness.

Prior Period Adjustment – Capitalization of Leasehold Improvements

The Commission entered into a new lease for the facility that is known as 5-RP and made improvements to the property from FY 2009 to FY 2011. The Commission purchased approximately \$19.2 million of leasehold improvements that were related to either build out construction of the facility or equipment that has become part of the facility. These disbursements were originally expensed when incurred instead of being recorded as capitalized assets.

In addition, the tenant improvement allowance received from the new lease agreements as well as the leasehold improvements that were purchased through the use of the tenant improvement allowance in the amount of \$2.7 million from FY 2009 to FY 2012 were not recorded.

The Commission does not have policies and procedures in place for identifying and recording leasehold improvements, as well as accounting for tenant improvement allowances. During FY 2013, the Commission recorded the appropriate assets and adjustments to cumulative results of operations and posted a prior period adjustment which required the restatement of the FY 2012 financial statements.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Commission's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws and regulations that have a direct effect on the determination of material amounts and disclosures in the financial statements. 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 described below and in Exhibit B that are required to be reported in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States or OMB Bulletin No. 14-02.

INDEPENDENT AUDITORS' REPORT (Continued)

Non-Compliance with Anti-Deficiency Act

In FY 2012, the Commission exceeded an appropriation limit on its Reception and Representation expenses. The Commission submitted the required Anti-Deficiency Act (ADA) letter to the Speaker of the House of Representatives, the Comptroller General of the United States, the President of United States Senate and the President of the United States on November 19, 2013.

In FY 2013 the Commission's Office of Inspector General disclosed in an investigative report that subsequent to FY 1996 employees working under telework status received reimbursement for telecommunication services without the proper certification of adequate safeguards against private misuse and without proper safeguards against private misuse. This has created a per se violation of the Purpose Act and a potential violation of the ADA. However, the Commission has not yet finalized its position regarding the ADA due to the existence of conflicting opinions from the DOJ's Office of Legal Counsel and the Comptroller General of the United States as to whether the situation would qualify as a violation of the ADA.

Management's Responsibilities for Internal Control and Compliance

Management is responsible for (1) evaluating the effectiveness of internal control over financial reporting based on criteria established under the Federal Managers' Financial Integrity Act (FMFIA), (2) providing a statement of assurance on the overall effectiveness on internal control over financial reporting, and (3) ensuring compliance with other applicable laws and regulations.

Auditors' Responsibilities

We are responsible for: (1) obtaining a sufficient understanding of internal control over financial reporting to plan the audit, (2) testing compliance with certain provisions of laws and regulations that have a direct effect on the determination of material amounts and disclosures in the financial statements and applicable laws for which OMB Bulletin 14-02 requires testing, and (3) applying certain limited procedures with respect to the MD&A and all other information included with the financial statements.

We did not evaluate all internal controls relevant to operating objectives as broadly established by the FMFIA, such as those controls relevant to preparing statistical reports and ensuring efficient operations. We limited our internal control testing to testing controls over financial reporting. Because of inherent limitations in internal control, misstatements due to error or fraud, losses, or noncompliance may nevertheless occur and not be detected. We also caution that projecting our audit results to future periods is subject to risk that controls may become inadequate because of changes in conditions or that the degree of compliance with controls may deteriorate. In addition, we caution that our internal control testing may not be sufficient for other purposes.

We did not test compliance with all laws and regulations applicable to the Commission. We limited our tests of compliance to selected provisions of laws and regulations that have a direct effect on the determination of material amounts and disclosures in the financial statements and those required by OMB Bulletin 14-02 that we deemed applicable to the Commission's financial statements for the fiscal year ended September 30, 2013. We caution that noncompliance with

INDEPENDENT AUDITORS' REPORT (Continued)

laws and regulations may occur and not be detected by these tests and that such testing may not be sufficient for other purposes.

Management's Response to Findings

Management's response to the findings identified in our report is presented in Exhibit D. We did not audit the Commission's response and, accordingly, we express no opinion on it.

Status of Prior Year's Control Deficiencies and Noncompliance Issues

We have reviewed the status of the Commission's corrective actions with respect to the findings included in the prior year's Independent Auditors' Report, dated November 16, 2012. The status of prior year findings is presented in Exhibit C.

Purpose of the Report on Internal Control over Financial Reporting and the Report on Compliance and Other Matters

The purpose of the Report on Internal Control over Financial Reporting and the Report on Compliance sections of this report is solely to describe the scope of our testing of internal control and compliance and the result of that testing, and not to provide an opinion on the effectiveness of the Commission's internal control or on compliance. These reports are an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Commission's internal control and compliance. Accordingly, these reports are not suitable for any other purpose.

A handwritten signature in black ink that reads "CliftonLarsonAllen LLP". The signature is written in a cursive, flowing style.

Calverton, Maryland
December 13, 2013

EXHIBIT A

Material Weakness

Prior Period Adjustment – Capitalization of Leasehold Improvements

The Commission entered into a new lease for the facility that is known as 5-RP and made improvements to the property from FY 2009 to FY 2011. The Commission purchased approximately \$19.2 million of leasehold improvements that were related to either build out construction of the facility or equipment that has become part of the facility. These disbursements were originally expensed when incurred instead of being recorded as capitalized assets.

In addition, the tenant improvement allowance received from the new lease agreements as well as the leasehold improvements that were purchased through the use of the tenant improvement allowance in the amount of \$2.7 million from FY 2009 to FY 2012 were not recorded.

The Commission does not have policies and procedures in place for identifying and recording leasehold improvements and tenant improvement allowances. During FY 2013, the Commission recorded the appropriate assets and adjustments to cumulative results of operations and posted a prior period adjustment which required the restatement of the FY 2012 financial statements.

Statement of Federal Financial Accounting Standards Number 6 states in part, "Property, plant and equipment also include assets acquired through capital leases, including leasehold improvements." In addition, according to OMB Circular A-123, *Management's Responsibility for Internal Control*, "management is responsible for establishing internal control to achieve the objectives of efficient and effective operations, reliable financial reporting, and compliance with applicable laws and regulations. Management shall consistently apply internal control standards to meet each of the internal control objectives and to assess internal control effectiveness."

Recommendations

We recommend that Commission management:

- Improve internal controls over financial reporting and property, plant, and equipment.
- Review new lease agreements and record tenant improvement allowances at the time the agreement is signed.
- Develop comprehensive policies and procedures over accounting and reporting for leases, including tenant improvement allowances, to be consistent with the existing generally accepted accounting guidance related to leases. A checklist for leases should be developed and required to be prepared and maintained for all leases, including equipment leases and GSA subleases. If GSA prepares such a lease analysis, a copy should be obtained, reviewed, and retained by the Commission to ensure proper accounting and reporting.

EXHIBIT B

Compliance Findings

Non-compliance with Anti-Deficiency Act

The Anti-Deficiency Act (ADA) prohibits making or authorizing an expenditure from, or creating or authorizing an obligation under any appropriation or fund in excess of the amount available in the appropriation or fund unless authorized by law.

In FY 2012, the Commission exceeded an appropriation limit on Reception and Representation expenses. The limit placed within the appropriation for FY 2012 was \$4,000 and the Commission exceeded that limit by \$7,556. This violation occurred when an office within the Commission incurred expenses in excess of the statutory limit when refreshments and gifts for foreign dignitaries were purchased during conferences hosted by the Commission and the proper funds approval process was not followed. In addition, the Commission was relying on a GAO decision that would have permitted the use of appropriated funds to purchase refreshments; however, as part of the investigation into the potential violation, the Commission became aware of an opinion by the U.S. Department of Justice's Office of Legal Counsel (OLC) which interprets the law as prohibiting the use of appropriated funds to purchase refreshments. After consultation with OMB, the Commission determined that they should follow the OLC opinion. The Commission provided the required notification of the violation of the ADA to the Speaker of the House of Representatives, the Comptroller General of the United States, the President of United States Senate and the President of the United States on November 19, 2013.

We also became aware of a second potential violation related to section 620 of Public Law 104-52 which authorizes federal agencies to use appropriated funds to install telephone lines and necessary equipment and to pay monthly charges in any residence of an employee authorized to work at home, provided that the agency certifies that adequate safeguards against private misuse exist and that the service is necessary for direct support of the agency's mission. In FY 2013 the Commission's Office of Inspector General disclosed in an investigative report that subsequent to FY 1996 employees working under telework status received reimbursement for telecommunication services without the proper certification of adequate safeguards against private misuse and without proper safeguards against private misuse. This has created a per se violation of the Purpose Act and a potential violation of the ADA. However, the Commission has not yet finalized its position regarding the ADA due to the existence of conflicting opinions from the DOJ's Office of Legal Counsel and the Comptroller General of GAO as to whether the situation would qualify as a violation of the ADA.

EXHIBIT C
Status of Prior Year Findings

Our assessment of the current status of the recommendations related to findings identified in the prior year audit is presented below:

<i>FY 2012 Finding</i>	<i>Type</i>	<i>FY 2013 Status</i>
Overstatement of Cumulative Results of Operations for FY 2011	Material Weakness	Resolved in 2013
Omission of FECA Actuarial Liability for FY 2011	Material Weakness	Resolved in 2013
Significant Deficiency over Accounts Payable and Budget Monitoring (comprised of the control deficiencies summarized below) <ul style="list-style-type: none"> • Oversight over payments processed by service provider • Deficiencies over manual travel authorizations and payments • Errors found in GovTrip application travel payments and GovTrip interface follow-up and review • Lack of centrally billed travel account oversight • Proper accrual of invoices at year-end • Non-performance of budgetary allowance holder reconciliations and follow-up • Allowance plan notice and reconciliation 	Significant Deficiency	Substantially resolved, and remaining items downgraded to Management Letter matters
Anti-Deficiency Act Violation	Compliance Finding	Repeat as a Compliance Finding and included in Exhibit B
Noncompliance with Prompt Payment Final Rule	Compliance Finding	Resolved in 2013
Noncompliance with Debt Collection Improvement Act	Compliance Finding	Resolved in 2013

EXHIBIT D

Management's Response to Findings



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

Date: December 13, 2013
To: Christopher Dentel
Inspector General
From: Jay Hoffman
Chief Financial Officer

A handwritten signature in black ink, appearing to read "J. Hoffman", written over the printed name of Jay Hoffman.

I am pleased to accept your audit report on the financial statements of the Consumer Product Safety Commission for fiscal year 2013. The agency's efforts and achievements toward improved financial management are clearly reflected in the audit report. The agency is satisfied to have received an unqualified audit opinion on the fiscal year 2013 financial statements. The agency has resolved two prior year material weaknesses pertaining to cumulative results of operations and the Federal Employee Compensation Act (FECA) actuarial liability, and has substantially resolved the significant deficiency over accounts payable and budget monitoring.

I acknowledge your report's conclusion that a material weakness in internal controls existed in the financial reporting process in fiscal year 2013 that resulted in the erroneous reporting of leasehold improvements dating back to fiscal year 2009. Management self-identified the reporting error and disclosed the correction in Note 15, restated the fiscal year 2012 financial statements to correct the error, and properly recorded the leasehold improvements in the fiscal year 2013 financial statements. I recognize the need to improve internal controls over financial reporting and to develop policies and procedures consistent with U.S. generally accepted accounting guidance for leasehold improvements.

I further acknowledge your reports disclosures on non-compliance with laws and regulations. Management has already taken corrective action to remedy the instances non-compliance by improving the associated internal controls.

I appreciate the efforts and leadership of the Office of the Inspector General (OIG) and of the auditors under contract to the OIG to audit CPSC's financial statements. Please convey my appreciation to your team for the professionalism and cooperation exhibited during this audit.