



CITY OF RAPID CITY

DEPARTMENT OF PARKS AND RECREATION
515 WEST BOULEVARD
RAPID CITY, SOUTH DAKOTA 57701

Lon Van Deusen
Interim Director
(605) 394-5225

To: Mayor Kooiker and City Council

From: Lon Van Deusen, Parks Division Manager

Subject: Cemetery Review by Casey Peterson & Associates

Date: August 21, 2012

Alex DeSmidt
Landscape Designer
(605) 394-5225

Jeri Taton
Administrative
Assistant
(605) 394-5225

Casey Peterson & Associates was engaged to assist the City of Rapid City in determining the accuracy of cemetery lot ownership and the proper burial of owners in their respective lots.

Lon Van Deusen,
Parks & Cemetery
Manager
(605) 394-4175

This report contains two sections. The first Section contains the procedures and findings and the second section contains recommendations from the consultant on improving internal controls to help insure the accuracy of records documenting cemetery lot ownership and the proper burial in respective lots.

Doug Lowe,
Recreation Manager
(605) 394-4168

Management was asked to review the initial findings and offer responses to initial questions raised by the consultant. Those responses can be found under Section I.

Staff is already working on an implementation plan regarding the recommendations and will be presenting the plan for City Council approval sometime this Fall.

CITY OF RAPID CITY

**INDEPENDENT ACCOUNTANTS' REPORT
ON APPLYING AGREED-UPON PROCEDURES**



**CASEY PETERSON
& ASSOCIATES, LTD.**
CPAs & FINANCIAL ADVISORS

RAPID CITY, SOUTH DAKOTA
GILLETTE, WYOMING



CASEY PETERSON & ASSOCIATES, LTD.
CPAs & FINANCIAL ADVISORS

Independent Accountants' Report
on Applying Agreed-upon Procedures

Mr. Lon Van Deusen, CPRP
Interim Director Parks and Recreation
City of Rapid City
300 6th Street
Rapid City, SD 57701

We have performed the procedures enumerated below, which were agreed to by the City of Rapid City, solely to assist the City of Rapid City in determining the accuracy of cemetery lot ownership and the proper burial of owners in their respective lots. The City of Rapid City's management is responsible for the accuracy of cemetery records documenting lot ownership and proper burial. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

This report is divided into two separate sections. Section I discusses the procedures we performed and the results of those procedures. Section II discusses our recommendations on improving internal controls to help ensure the accuracy of records documenting cemetery lot ownership and the proper burial of owners in their respective lots.

Section I - Procedure and Findings

Our procedures and findings are as follows:

1. From the "Master Record Book," we randomly selected 378 gravesites which had purchase dates from the four decades of 1970 through 2000 and performed the following procedures:
 - a. We traced the name of ownership indicated in the "Master Record Book" to the deed and other documentation available.
There were no exceptions to this procedure.
 - b. We compared the name indicated on the "Master Record Book" to the headstone located on the corresponding gravesite. Gravesites were located by using the "Master Record Book" and by measuring out each selected gravesite.

We found eleven instances of gravesites that did not have a marker or headstone.

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Management's Response: It is the policy of Management of the City of Rapid City to not provide grave markers to families who choose not to provide one for the gravesite. This responsibility lies with the families. The funeral homes engaged by the families are responsible for placing temporary markers at the time of burial. However, over time, these temporary markers may get destroyed or be removed from the gravesite by the family. Other relevant information related to the eleven instances of missing markers and headstones is as follows:

- i. One was a cremation burial. This individual's spouse is buried in close proximity to this burial, and the last name of the spouse corresponds to the name indicated on our burial records for this site.
 - ii. One was an infant burial. Based on our experience, it is not uncommon for infant burials to not have markers or headstones.
 - iii. Three were county burials. Based on our experience, it is not uncommon for county burials to not have markers or headstones. Of these three burials, there were temporary markers present on two of the burials, but the paper inserts were missing.
 - iv. According to our burial records, the last name on one of the burial sites corresponded to the name on a marker or headstone that was in close proximity to the burial site selected for testing, suggesting this is a family plot.
2. As part of our engagement, we reviewed the results of our tests with management to determine if additional procedures were necessary. Based on the results of the procedures performed, Management of the City of Rapid City has determined that no further work is necessary. This conclusion is based on using a sample size (378) to provide a 95% confidence level with a margin of error of plus or minus 5%. Therefore, it was determined that additional tests would yield results similar to those discussed above.

Section II - Recommendations

During the performance of our procedures we identified certain opportunities to strengthen internal controls to help ensure the accuracy of records documenting cemetery lot ownership and the proper burial of owners in their respective lots. Those recommendations are as follows:

1. During the performance of our procedures we identified instances where the names on deeds did not correspond to names in the "Master Record Book." We were able to review monthly funeral home billing reports prepared by cemetery personnel to make the connection between names on the deeds and names on burial sites documented in the "Master Record Book." Even though this documentation provides a trail for the transaction and burial, the monthly funeral home billing reports do not document the deed holder's authorization to bury an individual in a specific location.

The City has created some forms to document the authorization of the family to bury someone in a selected lot and/or to document the legal authority of the person making the request for the burial. However, this process has not been fully implemented. In addition, there are certain legal issues in this process that we recommend the City Attorney review to ensure the process is in compliance with the applicable laws.

Upon the City Attorney reviewing this process, we recommend that the City develop and fully implement a formal written policy for documenting ownership and burials related to all lots. We recommend that the written policy include references to the applicable forms that must be used to document ownership of lots and proper authority to make burial decisions when questions arise. We suggest that these forms be signed during correspondence with funeral homes or with families. The City should also consider having the authorized family member document on maps which lot shall be used for burials and signing off on those maps. Those maps should include the names of other family members in the burial area, if applicable, so the family member can clearly understand which lot will be used for the burial. This map, along with forms documenting burial authority and lot ownership, should all be filed in one location to create a trail in the event there are questions related to proper burial.

2. To limit the element of human error, we recommend that prior to a burial occurring, two employees of the City review and measure the lot selected for the burial. This will help ensure that the burial will occur in the correct location. We recommend that this control be documented by having the two employees of the City sign off on the map referenced in bullet point 1 above, or a separate form for documenting this procedure. A burial should not occur until both City employees have provided authorization.
3. As documented in this report, eleven of the grave sites included in our sample did not have markers or headstones. This makes it difficult to determine with ease if a burial is correct. We recommend that the City explore implementing a policy whereby each burial will have some type of low cost permanent marker or headstone (i.e. the cement markers that were used in the earlier decades, markers used in the infant sections, or perhaps tags that could be buried in the ground and located with a metal detector) to indicate the person buried in that plot.

We were not engaged to, and did not, conduct a financial examination, the objective of which would be the expression of an opinion on the accuracy of cemetery lot ownership and proper burial of owners in their respective lots. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the management of the City of Rapid City and its City Council and is not intended to be and should not be used by anyone other than those specified parties.

A handwritten signature in blue ink that reads "Casey Peterson & Associates, Ltd." with a stylized flourish at the end.

Casey Peterson & Associates, Ltd.

Rapid City, South Dakota
August 20, 2012