

Clermont County Insurance Consortium  
Clermont County  
Regular Audit  
For the Fiscal Year Ended June 30, 2019



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OHIO AUDITOR OF STATE  
KEITH FABER



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Board of Directors  
Clermont County Insurance Consortium  
2400 Clermont Center Drive  
Batavia, Ohio 45103

We have reviewed the *Independent Auditor's Report* of the Clermont County Insurance Consortium, Clermont County, prepared by Millhuff-Stang, CPA, Inc., for the audit period July 1, 2018 through June 30, 2019. Based upon this review, we have accepted these reports in lieu of the audit required by Section 117.11, Revised Code. The Auditor of State did not audit the accompanying financial statements and, accordingly, we are unable to express, and do not express an opinion on them.

Our review was made in reference to the applicable sections of legislative criteria, as reflected by the Ohio Constitution, and the Revised Code, policies, procedures and guidelines of the Auditor of State, regulations and grant requirements. The Clermont County Insurance Consortium is responsible for compliance with these laws and regulations.

A handwritten signature in black ink that reads "Keith Faber".

Keith Faber  
Auditor of State  
Columbus, Ohio

October 15, 2019

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**Clermont County Insurance Consortium**  
**Clermont County**  
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**Independent Auditor's Report**

Board of Directors  
Clermont County Insurance Consortium  
2400 Clermont Center Drive, Suite 100  
Batavia, Ohio 45103

***Report on the Financial Statements***

We have audited the accompanying financial statements of the cash balance, receipts and disbursements, and related notes of Clermont County Insurance Consortium, Clermont County, Ohio, (the Consortium), as of and for the year ended June 30, 2019.

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

Management is responsible for preparing and fairly presenting these financial statements in accordance with the accounting principles generally accepted in the United States of America. This responsibility includes the designing, implementing and maintaining internal control relevant to preparing and fairly presenting financial statements that are free from material misstatement, whether due to fraud or error.

***Auditor's Responsibility***

Our responsibility is to opine on these financial statements based on our audit. We audited in accordance with auditing standards generally accepted in the United States of America and the financial audit standards in the Comptroller General of the United States' *Government Auditing Standards*. Those standards require us to plan and perform the audit to reasonably assure the financial statements are free from material misstatement.

An audit requires obtaining evidence about financial statement amounts and disclosures. The procedures selected depend on our judgment, including assessing the risks of material financial statement misstatement, whether due to fraud or error. In assessing those risks, we consider internal control relevant to the Consortium's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not to the extent needed to opine on the effectiveness of the Consortium's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of management's accounting policies and the reasonableness of their significant accounting estimates, as well as our evaluation of the overall financial statement presentation.

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

***Basis for Adverse Opinion***

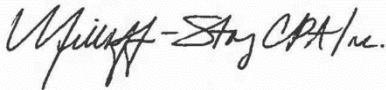
As described in Note 1 of the financial statements, the Consortium prepared these financial statements using the accounting basis Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D) permit. However, Ohio Administrative Code Section 117-2-03(B) requires these statements to follow accounting principles generally accepted in the United States of America. The effects on the financial statements of the variances between the regulatory basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumably material.

***Adverse Opinion***

In our opinion, because of the significance of the matter discussed in the *Basis for Adverse Opinion* paragraph, the financial statements referred to above do not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of the Consortium as of June 30, 2019, and the respective changes in financial position or cash flows thereof for the year then ended.

***Other Reporting Required by Government Auditing Standards***

In accordance with *Government Auditing Standards*, we have also issued our report dated September 3, 2019, on our consideration of the Consortium's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. That report describes the scope of our internal control testing over financial reporting and compliance, and the results of that testing, and does not opine on the effectiveness of internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Consortium's internal control over financial reporting and compliance.



Millhuff-Stang, CPA, Inc.  
Portsmouth, Ohio

September 3, 2019



**Clermont County Insurance Consortium**  
**Clermont County**  
*Statement of Cash Receipts, Cash Disbursements and Changes in Cash Balances*  
*For the Fiscal Year Ended June 30, 2019*

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<i>Operating Cash Receipts:</i>	
Flexible Spending Contributions	\$ 133,369
Miscellaneous	<u>11,358</u>
<i>Total Operating Cash Receipts</i>	<u>144,727</u>
 <i>Operating Cash Disbursements:</i>	
Flexible Spending Claims	168,922
Administrative and Stop Loss Fees	53,144
Health Insurance Premium	1,298,358
Other Purchased Services	<u>11,448</u>
<i>Total Operating Cash Disbursements</i>	<u>1,531,872</u>
<i>Operating Cash Receipts Under Operating Cash Disbursements</i>	<u>(1,387,145)</u>
 <i>Non-Operating Cash Receipts:</i>	
Interest	<u>16,142</u>
<i>Total Non-Operating Cash Receipts</i>	<u>16,142</u>
<i>Net Receipts Under Disbursements</i>	(1,371,003)
<i>Cash Balance, July 1</i>	<u>1,706,411</u>
<i>Cash Balance, June 30</i>	<u><u>\$ 335,408</u></u>

The notes to the financial statements are an integral part of this statement.

**Clermont County Insurance Consortium**  
**Clermont County**  
*Notes to the Financial Statements*  
*For the Fiscal Year Ended June 30, 2019*

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1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

A. Description of the Entity

The Clermont County Insurance Consortium, Clermont County, Ohio (the Consortium), formed July 1, 2008, is a Regional Council of Governments, governed by and construed in accordance with the laws of the State, and it is the intention of the Consortium members that their agreements shall comply with Section 9.833 of the Ohio Revised Code. The Consortium was established for the purpose of exercising the rights and privileges conveyed to it by the by-laws (agreement) of the Consortium.

The Clermont County Insurance Consortium is a legally separate organization. The Consortium is in a jointly governed organization with member governmental entities. The Consortium was formed for the purpose of establishing and carrying out a cooperative health program for its member governmental entities. The governing board consists of the superintendent or other designee appointed by each of the members of the Consortium.

The Consortium utilizes the Clermont County Educational Service Center as its fiscal agent. The financial activity for the Consortium is reflected as an agency fund of the fiscal agent.

Management believes the financial statements included in this report represent all of the financial activity of the Consortium over which the Consortium has the ability to exercise direct operating control.

The Consortium used Gallagher Benefit Services, Inc. for consulting services until January 1, 2019. The Consortium uses Chard Snyder for administering their section 125 plan.

Any Consortium member wishing to withdraw from participation in the Consortium shall give notification at least one hundred eighty days prior to the July 1 anniversary date of the Consortium's health plan. The effective date of withdraw will be June 30. Any Consortium member which withdraws from the Consortium shall have no claim to the Consortium's assets and shall not be entitled to the return or refund of any premiums or other amounts paid, directly or indirectly, by such Consortium member to the Consortium. A withdrawing member may not become a Consortium member again for a period of 3 years.

On January 1, 2017, Clermont County Insurance Consortium joined the Southwestern Ohio Educational Purchasing Council (EPC) for health, dental, vision, and life insurances. The Clermont County Insurance Consortium is no longer self-funded as of January 1, 2017. The Consortium incurred run out claims through December 31, 2017. The Southwestern Ohio Educational Purchasing Council (EPC) is a council of governments with over 40 years of service experience, pooling the purchase power of 180 Ohio School Districts. All insurances operate as if they are a fully insured plan where districts pay an annual premium (as determined by EPC) for their coverages. Districts pay monthly premiums directly to EPC. The Consortium Board, at its December 20, 2018 board meeting, approved a premium holiday for medical insurance in February 2019 where the Consortium paid the medical premium for all its member schools and employees.

Beginning January 1, 2019, the Districts' section 125 flexible spending payments will no longer go to the EPC. They will be sent directly to the Consortium and be deposited into the Consortium's bank account.

Clermont County Educational Service Center is located at 2400 Clermont Center Drive, Suite 100, Batavia, Ohio 45103.

B. Basis of Accounting

Although required by OAC 117-2-03(B) to prepare its annual financial report in accordance with accounting principles generally accepted in the United States of America (GAAP), the Consortium chooses to prepare its financial statements on the basis of accounting permitted by the financial reporting provisions of Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D), which is a basis of accounting other

**Clermont County Insurance Consortium**  
**Clermont County**  
*Notes to the Financial Statements*  
*For the Fiscal Year Ended June 30, 2019*

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than GAAP. This is similar to the cash receipts and disbursements basis of accounting. Receipts are recognized when received in cash rather than when earned, and disbursements are recognized when paid rather than when a liability is incurred. These statements include adequate disclosure of material matters, as the financial reporting provisions of Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D) permit.

C. Cash and Investments

The Consortium's cash is held and invested by the Clermont County Educational Service Center (the Service Center), who acts as custodian of Consortium monies. The Consortium's assets are held by the Service Center in a separate demand deposit account and in STAR Ohio and STAR Plus accounts. The investments in STAR Ohio (the State Treasurer's investment pool) are valued at amounts reported by the State Treasurer.

D. Budgetary Process

The member governments of the Consortium are required by Ohio law to adopt an annual budget. The Consortium itself does not adopt a budget.

E. Operating Cash Receipts and Cash Disbursements

Operating cash receipts are those receipts that are generated directly from the primary activity of the proprietary fund. For the Consortium, these cash receipts are miscellaneous in nature. Operating cash disbursements are necessary costs incurred to provide the goods and/or services that are the primary activity of the fund. Receipts and disbursements not meeting these definitions are reported as non-operating.

2. CASH AND INVESTMENTS

The Service Center is the fiscal agent for the Consortium. The Service Center maintains specific deposits and investments for the Consortium. The Ohio Revised Code prescribes allowable deposits and investments. The carrying amount of deposits and investments held by the Service Center for the Consortium at June 30, 2019 was as follows:

Cash:	
Demand Deposits	\$52,738
Investments:	
STAR Ohio	280,166
STAR Plus	<u>2,504</u>
Total Deposits and Investments	<u>\$335,408</u>

*Deposits:* Deposits are insured by the Federal Depository Insurance Corporation or collateralized through the Ohio Pooled Collateral System (OPCS).

*Investments:* Investments in STAR Ohio are not evidenced by securities that exist in physical or book-entry form.

3. RISK MANAGEMENT

The Clermont County Insurance Consortium, Clermont County, Ohio (the Consortium), is a Regional Council of Governments, governed by and construed in accordance with the laws of the State, and it is the intention of the Consortium members that their agreements shall comply with Section 9.833 of the Ohio Revised Code. The Consortium was established for the purpose of exercising the rights and privileges conveyed to it by the by-laws (agreement) of the Consortium.

**Clermont County Insurance Consortium**  
**Clermont County**  
*Notes to the Financial Statements*  
*For the Fiscal Year Ended June 30, 2019*

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The Consortium is governed by a Board of Directors who selects qualified insurance companies that provide the health insurance that is adequate to meet the needs of each member school under its benefit plan for its employees. The Board of Directors is composed of one representative from each member school.

Member schools may withdraw from the Consortium, and may be removed for failure to make the required payments. Upon withdraw of any Consortium member, the Consortium shall pay the run out of all benefit claims for such Consortium member provided such Consortium member has paid to the Consortium prior to the effective date of withdraw a withdraw fee in the amount equal to two (2) months' premiums at such Consortium member's then current rates.

Any Consortium member which withdraws from the Consortium shall have no claim to the Consortium's assets and shall not be entitled to the return or refund of any premiums or other amounts paid, directly or indirectly, by such Consortium member to the Consortium. A withdrawing member may not become a Consortium member again for a period of three (3) years.

4. NONCOMPLIANCE

Although required by Ohio Administrative Code Section 117-2-03(B) to prepare its financial report in accordance with accounting principles generally accepted in the United States of America (GAAP), the Consortium chooses to prepare its financial statements and notes using the accounting basis Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D) permit. This is not in compliance with Ohio law.

**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***

Independent Auditor's Report

Board of Directors  
Clermont County Insurance Consortium  
2400 Clermont Center Drive, Suite 100  
Batavia, Ohio 45103

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 financial statements of the Clermont County Insurance Consortium, Clermont County, (the Consortium) as of and for the year ended June 30, 2019, and the related notes to the financial statements, and have issued our report thereon dated September 3, 2019, wherein we noted the Consortium followed financial reporting provisions Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D) permit. The Consortium is required by Ohio Administrative Code Section 117-2-03(B) to follow accounting principles generally accepted in the United States of America. As such, we have issued an adverse opinion.

**Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the Consortium'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 Consortium's internal control. Accordingly, we do not express an opinion on the effectiveness of the Consortium's 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 that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.



### **Compliance and Other Matters**

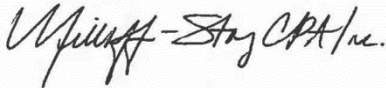
As part of obtaining reasonable assurance about whether the Consortium's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement 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 an instance of noncompliance or other matter that is required to be reported under *Government Auditing Standards* and which is described in the accompanying schedule of findings and responses as item 2019-001.

### **Consortium's Response to Finding**

The Consortium's response to the finding identified in our audit is described in the accompanying schedule of findings and responses. The Consortium's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly we express no opinion on it.

### **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 entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.



Millhuff-Stang, CPA, Inc.  
Portsmouth, Ohio

September 3, 2019

**Clermont County Insurance Consortium**  
*Schedule of Findings and Responses*  
*For the Fiscal Year Ended June 30, 2019*

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**Finding 2019-001**

**Noncompliance – Financial Reporting**

Ohio Administrative Code Section 117-2-03(B) requires the Consortium to prepare its annual financial report in accordance with generally accepted accounting principles (GAAP). The Consortium filed financial statements with the Auditor of State, however those statements were filed using the accounting basis Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D) permit. We recommend the Consortium file on the GAAP basis of accounting in order to comply with the Ohio Administrative Code.

**Client Response:**

Due to the limited amount of transactions for the Insurance Consortium it's not reasonable to file on a GAAP basis.

**Clermont County Insurance Consortium**

*Schedule of Prior Audit Findings*

*For the Fiscal Year Ended June 30, 2019*

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Finding Number	Finding Summary	Status	Additional Information
Finding 2018-001	Noncompliance – Financial Reporting	Not Corrected	Reissued as Finding 2019-001



# OHIO AUDITOR OF STATE KEITH FABER



**CLERMONT COUNTY INSURANCE CONSORTIUM**

**CLERMONT COUNTY**

## **CLERK'S CERTIFICATION**

**This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.**

*Susan Babbitt*

**CLERK OF THE BUREAU**

**CERTIFIED  
NOVEMBER 7, 2019**