# AUDIT REPORT

**JANUARY 1, 2016 - DECEMBER 31, 2017** 



Board of Trustees Penn Township 444 Scott-Penn Lane Malta, Ohio 43758

We have reviewed the *Independent Auditors' Report* of Penn Township, Morgan County, prepared by Wilson, Phillips & Agin, CPA's, Inc., for the audit period January 1, 2016 through December 31, 2017. 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. Penn Township is responsible for compliance with these laws and regulations.

Dave Yost Auditor of State

November 13, 2018



# PENN TOWNSHIP MORGAN COUNTY JANUARY 1, 2016 - DECEMBER 31, 2017

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# WILSON, PHILLIPS & AGIN, CPA'S, INC. 1100 BRANDYWINE BLVD. BUILDING G ZANESVILLE, OHIO 43701

#### INDEPENDENT AUDITORS' REPORT

Penn Township Morgan County 444 Scott-Penn Lane Malta, Ohio 43758

To the Township Trustees:

#### **Report on the Financial Statements**

We have audited the accompanying financial statements of the cash balances, receipts and disbursements by fund type and related notes of Penn Township, Morgan County, as of and for the years ended December 31, 2017 and 2016.

# Management's Responsibility For the Financial Statements

Management is responsible for preparing and fairly presenting these financial statements in accordance with the financial reporting provisions Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D) permit; this responsibility includes designing, implementing and maintaining internal control relevant to preparing and fairly presenting financial statements 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 Township'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 Township's internal control. Accordingly, we express no 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 the audit evidence we obtained is sufficient and appropriate to support our audit opinion.

# Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles

As described in Note 2 of the financial statements, the Township prepared these financial statements using the accounting basis permitted by the financial reporting provisions of Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D), which is an accounting basis other than accounting principles generally accepted in the United States (GAAP), to satisfy these requirements.

Independent Auditors' Report Page Two

Although the effects on the financial statements of the variances between the regulatory accounting basis and GAAP are not reasonable determinable, we presume they are material.

Though the Township does not intend these statements to conform to GAAP, auditing standards generally accepted in the United States of America require us to include an adverse opinion on GAAP. However, the adverse opinion does not imply the amounts reported are materially misstated under the accounting basis Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D) permit. Our opinion on this accounting basis permitted is in the *Opinion on Regulatory Basis of Accounting* paragraph below.

#### Adverse Opinion on U.S. Generally Accepted Accounting Principles

In our opinion, because of the significance of the matter discussed in the *Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles* 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 Penn Township, Morgan County as of December 31, 2017 and 2016, or changes in financial position thereof for the years then ended.

#### **Opinion on Regulatory Basis of Accounting**

In our opinion, the financial statements referred to above present fairly, in all material respects, the combined cash balances of Penn Township, Morgan County as of December 31, 2017 and 2016, and its combined cash receipts and disbursements for the years then ended in accordance with the financial reporting provisions Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D) permit, described in Note 2.

# Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued a report dated March 21, 2018, on our consideration of Penn Township'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 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 Township's internal control over financial reporting and compliance.

Wilson, Phillips & Agin, CPA's, Inc. Zanesville, Ohio March 21, 2018

# COMBINED STATEMENT OF CASH RECEIPTS, CASH DISBURSEMENTS, AND CHANGES IN FUND CASH BALANCES ALL GOVERNMENTAL FUND TYPES FOR THE YEAR ENDED DECEMBER 31, 2017

	Governmental Fund Types					
	Ge	neral	Special Revenue		Totals (Memorandum Only)	
Cash Receipts:				44.074		-2.10-
Property and Other Local Taxes	\$	22,434	\$	41,051	\$	63,485
Charges for Services		-		1,571		1,571
Intergovernmental		17,762		92,913		110,675
Earnings on Investments		293		260		553
Miscellaneous		-		2,345		2,345
Total Cash Receipts		40,489		138,140		178,629
Cash Disbursements:						
Current:						
General Government		30,031		3,120		33,151
Public Safety		-		15,670		15,670
Public Works		1,634		80,743		82,377
Health		-		7,283		7,283
Capital Outlay		-		5,432		5,432
Debt Service:						
Principal Retirement		988		6,809		7,797
Interest and Fiscal Charges		12		80		92
<b>Total Cash Disbursements</b>		32,665		119,137		151,802
<b>Excess of Receipts Over (Under) Disbursements</b>		7,824		19,003		26,827
Other Financing Receipts (Disbursements)						
Other Financing Sources		3,876				3,876
<b>Total Other Financing Receipts (Disbursements)</b>		3,876				3,876
Net Change in Fund Cash Balances		11,700		19,003		30,703
Fund Cash Balances, January 1		8,642		128,833		137,475
Fund Cash Balances, December 31						
Restricted		-		147,836		147,836
Unassigned (Deficit)		20,342		•		20,342
Fund Cash Balances, December 31	\$	20,342	\$	147,836	\$	168,178

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2017

#### 1. REPORTING ENTITY

#### **Description of the Entity**

The constitution and laws of the State of Ohio establish the rights and privileges of Penn Township, Morgan County, (the Township) as a body corporate and politic. A publically-elected three-member Board of Trustees directs the Township. The Township provides road and bridge maintenance, cemetery maintenance, fire protection, and emergency medical services. The Township contracts with the Pennsville Volunteer Fire Company to provide fire and emergency medical services.

The Township participates in the Ohio Township Association Risk Management Authority (OTARMA) public entity risk pool. Note 6 to the financial statements provides additional information for this entity.

The Township's management believes these financial statements present all activities for which the Township is financially accountable.

# 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

#### A. Basis of Presentation

The Township's financial statements consist of a combined statement of receipts, disbursements and changes in fund balances (regulatory cash basis) for all governmental fund types and a combined statement of receipts, disbursements and changes in fund balances (regulatory cash basis) for all proprietary and fiduciary fund types which are organized on a fund type basis.

#### B. Fund Accounting

The Township uses funds to maintain its financial records during the year. A fund is defined as a fiscal and accounting entity with a self-balancing set of accounts. The funds of the Township are presented below:

#### **General Fund**

The General Fund accounts for and reports all financial resources not accounted for and reported in another fund. The general fund balance is available to the Township for any purpose provided it is expended or transferred according to the general laws of Ohio.

#### **Special Revenue Funds**

These funds account for and report the proceeds of specific revenue sources that are restricted or committed to expenditure for specified purposes other than debt service or capital projects. The Township had the following significant Special Revenue Funds:

**Gasoline Tax Fund** – This fund receives gasoline tax monies to pay for constructing, maintaining, and repairing Township roads.

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2017

#### 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

#### C. Basis of Accounting

These financial statements follow the accounting basis permitted by the financial reporting provisions of Ohio Revised Code Section 117.38 and Ohio Administrative Code 117-2-03(D). This basis is similar to the cash receipts and disbursements accounting basis. The Township recognizes receipts when received in cash rather than when earned, and recognizes disbursements when paid rather than when a liability is incurred. Budgetary presentations report budgetary expenditures when a commitment is made (i.e., when an encumbrance is approved).

These statements include adequate disclosure of material matters, as the financial reporting provisions of Ohio Revised Code Section 117.38 and Ohio Administrative Code 117-2-03(D) permit.

#### D. Budgetary Process

The Ohio Revised Code requires that each fund be budgeted annually.

### **Appropriations**

Budgetary expenditures (that is, disbursements and encumbrances) may not exceed appropriations at the fund, function and object level of control and appropriations may not exceed estimated resources. The Trustees must annually approve appropriation measures and subsequent amendments. Unencumbered appropriations lapse at year end.

#### **Estimated Resources**

Estimated resources include estimates of cash to be received (budgeted receipts) plus unencumbered cash as of January 1. The County Budget Commission must approve estimated resources.

#### **Encumbrances**

The Ohio Revised Code requires the Township to reserve (encumber) appropriations when individual commitments are made. Encumbrances outstanding at year end are canceled, and re-appropriated in the subsequent year.

A summary of 2017 budgetary activity appears in Note 3.

#### E. Deposits and Investments

The Township's accounting basis includes investment as assets. This basis does not record disbursement for investment purchases or receipts for investment sales. This basis records gains or losses at the time of sale as receipts or disbursements, respectively.

#### F. Capital Assets

The Township records disbursements for acquisitions of property, plant and equipment when paid. The accompanying financial statements do not report these items as assets.

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2017

#### 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

#### G. Accumulated Leave

In certain circumstances, such as upon leaving employment, employees are entitled to cash payments for unused leave. The financial statements do not include a liability for unpaid leave.

# H. Fund Balance

Fund balance is divided into five classifications based primarily on the extent to which the Township must observe constraints imposed upon the use of its governmental-fund resources. The classifications are as follows:

#### **Nonspendable**

The Township classifies assets as *nonspendable* when legally or contractually required to maintain the amounts intact.

#### Restricted

Fund balance is *restricted* when constraints placed on the use of resources are either externally imposed by creditors (such as through debt covenants), grantors, contributors, or laws or regulations of other governments; or is imposed by law through constitutional provisions.

#### Committed

Trustees can *commit* amounts via formal action (resolution). The Township must adhere to these commitments unless the Trustees amend the resolution. Committed fund balance also incorporates contractual obligations to the extent that existing resources in the fund have been specifically committed to satisfy contractual requirements.

#### **Assigned**

Assigned fund balances are intended for specific purposes but do not meet the criteria to be classified as *restricted* or *committed*. Governmental funds other than the general fund report all fund balances as *assigned* unless they are restricted or committed. In the general fund, *assigned* amounts represent intended uses established by Township Trustees or a Township official delegated that authority by resolution, or by State Statute.

#### Unassigned

Unassigned fund balance is the residual classification for the general fund and includes amounts not included in the other classifications. In other governmental funds, the unassigned classification is used only to report a deficit balance.

The Township applies restricted resources first when expenditures are incurred for purposes for which either restricted or unrestricted (committed, assigned, and unassigned) amounts are available. Similarly, within unrestricted fund balance, committed amounts are reduced, first followed by assigned, and then unassigned amounts when expenditures are incurred for purposes for which amounts in any of the unrestricted fund balance classifications could be used.

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2017

#### 3. BUDGETARY ACTIVITY

Budgetary activity for the year ended December 31, 2017 is as follows:

2017 Budgeted vs. Actual Recei
--------------------------------

Fund Type	Budgeted Receipts		Actual Receipts		Variance		
General	\$ 35,000	\$	44,365	\$	9,365		
Special Revenue	116,000		138,140		22,140		
Total	\$ 151,000	\$	182,505	\$	31,505		

2017 Budgeted vs. Actual Budgetary Basis Expenditures

	Aj	Appropriation		Budgetary		_	
Fund Type		Authority Expenditures		Authority			Variance
General	\$	47,148	\$	32,665	\$	14,483	
Special Revenue		241,328		119,137		122,191	
Total	\$	288,476	\$	151,802	\$	136,674	

Contrary to ORC 5705.41(D), the Township made expenditures prior to certification.

# 4. EQUITY IN POOLED CASH

The Township maintains a deposit pool all funds use. The Ohio Revised Code prescribes allowable deposits and investments. The carrying amount of deposits at December 31 was as follows:

	2017
Demand Deposits	\$ 168,178
Total	\$ 168,178

**Deposits**: Deposits are either insured by the Federal Depository Insurance Corporation or collateralized by the financial institution's public entity deposit pool.

#### 5. PROPERTY TAX

Real property taxes become a lien on January 1 preceding the October 1 date for which rates are adopted by Township Trustees. The State Board of Tax Equalization adjusts these rates for inflation. Property taxes are also reduced for applicable homestead and rollback deductions. The financial statements include homestead and rollback amounts the State pays as intergovernmental receipts. Payments are due to the County by December 31. If the property owner elects to pay semiannually, the first half is due December 31. The second half payment is due the following June 20.

Public utilities are also taxed on personal and real property located within the Township.

The County is responsible for assessing property, and for billing, collecting, and distributing all property taxes on behalf of the Township.

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2017

#### 6. RISK MANAGEMENT

The Township is exposed to various risks of property and casualty losses, and injuries to employees.

The Township insures against injuries to employees through the Ohio Bureau of Workers' Compensation.

The Township belongs to the Ohio Township Association Risk Management Authority (OTARMA), a risk-sharing pool available to Ohio townships. OTARMA provides property and casualty coverage for its members. York Risk Pooling Services, Inc. (formally known as American Risk Pooling Consultants, Inc.). functions as the administrator of the Pool and provides underwriting claims, loss control, risk management, and reinsurance services for the Pool. Member governments pay annual contributions to fund OTARMA. OTARMA pays judgments, settlements and other expenses resulting from covered claims that exceed the members' deductibles.

#### Casualty and Property Coverage

The Pool is a member of American Public Entity Excess Pool (APEEP), which is also administered by York. APEEP provides the Pool with an excess risk-sharing program. Under this arrangement, OTARMA retains insured risks up to an amount specified in the contracts. At December 31, 2016, OTARMA retained \$350,000 for casualty claims and \$250,000 for property claims.

The aforementioned casualty and property reinsurance agreement does not discharge OTARMA's primary liability for claims payments on covered losses. Claims exceeding coverage limits are the obligation of the respective government.

#### **Financial Position**

OTARMA's financial statements (audited by other accountants) conform with generally accepted accounting principles, and reported the following assets, liabilities and retained earnings at December 31, 2016 (the latest information available):

	2016
Assets	\$38,473,283
Liabilities	(8,244,140)
Retained Earnings	\$30,229,143

At December 31, 2016 the liabilities above include approximately \$7.4 million of estimated incurred claims payable. The assets above also include approximately \$6.9 million of unpaid claims to be billed to approximately 1,010 member governments in the future, as of December 31, 2016. These amounts will be included in future contributions from members when the related claims are due for payment. As of December 31, 2016, the Township's share of these unpaid claims collectible in future years is approximately \$1,578.

Based on discussion with OTARMA, the expected rates OTARMA charges to compute member contributions, which are used to pay claims as they become due, are not expected to change significantly from those used to determine the historical contributions detailed below. By contract, the annual liability of each member is limited to the amount of financial contributions required to be made to OTARMA for each year of membership.

Contributions to OTARMA					
2017	\$3,507				
2016	3,561				
2015	3,574				

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2017

#### 6. RISK MANAGEMENT(Continued)

After completing one year of membership, a member may withdraw on the anniversary of the date of joining OTARMA if the member notifies OTARMA in writing 60 days prior to the anniversary date. Upon withdrawal, members are eligible for a full or partial refund of their capital contributions, minus the subsequent year's contribution. Withdrawing members have no other future obligation to the pool. Also upon withdrawal, payments for all casualty claims and claim expenses become the sole responsibility of the withdrawing member, regardless of whether a claim occurred or was reported prior to the withdrawal.

# 7. DEFINED BENEFIT PENSION PLANS

Ohio Public Employees Retirement System

The Township's full-time employees belong to the Public Employees Retirement System (OPERS) of Ohio. OPERS is a cost-sharing, multiple employer plan. The Ohio Revised Code prescribes the plan benefits, which include postretirement healthcare, and survivor and disability benefits.

The Ohio Revised Code also prescribes contribution rates. For 2017, OPERS members contributed 10.0% of their gross wages and the Township contributed an amount equal to 14.0% of participant's gross salaries. The Township has paid all contributions required through December 31, 2017.

# 8. POSTEMPLOYMENT BENEFITS

OPERS offers cost-sharing, multiple-employer defined benefit postemployment plans, which include multiple health care plans including medical coverage, prescription drug coverage, deposits to a Health Reimbursement Arrangement and Medicare Part B premium reimbursements, to qualifying benefit recipients. OPERS contributes 2 percent of the employer contribution to fund these benefits.

#### 9. DEBT

All debt was paid off in 2017.

#### 10. PUBLIC ENTITY RISK POOL

The Township belongs to the Ohio Township Association Risk Management Authority (OTARMA), a risk-sharing pool available to Ohio local governments. OTARMA provides property and casualty coverage for its members. OTARMA is a member of the American Public Entity Excess Pool (APEEP). Member governments pay annual contributions to fund OTARMA. OTARMA pays judgments, settlements and other expenses resulting from covered claims exceeding the member's deductible.

# COMBINED STATEMENT OF CASH RECEIPTS, CASH DISBURSEMENTS, AND CHANGES IN FUND CASH BALANCES ALL GOVERNMENTAL FUND TYPES FOR THE YEAR ENDED DECEMBER 31, 2016

	Governmental Fund Types				_	
	G	leneral	Special Revenue		Totals (Memorandum Only)	
Cash Receipts:	ф	20.175	Ф	27.075	Ф	57.050
Property and Other Local Taxes	\$	20,175	\$	37,075	\$	57,250
Charges for Services		-		446		446
Intergovernmental		19,536		90,933		110,469
Earnings on Investments		246		197		443
Miscellaneous		677		1,846		2,523
Total Cash Receipts		40,634		130,497		171,131
Cash Disbursements:						
Current:						
General Government		36,493		65,875		102,368
Public Safety		-		9,210		9,210
Public Works		-		7,132		7,132
Health		-		7,357		7,357
Debt Service:						
Principal Retirement		3,894		3,047		6,941
Interest and Fiscal Charges		156		122		278
<b>Total Cash Disbursements</b>		40,543		92,743		133,286
<b>Excess of Receipts Over (Under) Disbursements</b>		91		37,754		37,845
Other Financing Receipts (Disbursements) Other Financing Sources		3,677		151		3,828
Other Philaneling Sources		3,077		131		3,020
<b>Total Other Financing Receipts (Disbursements)</b>		3,677		151		3,828
Net Change in Fund Cash Balances		3,768		37,905		41,673
Fund Cash Balances, January 1, Restated		4,874		90,928		95,802
Fund Cash Balances, December 31						
Restricted		-		128,833		128,833
Unassigned (Deficit)		8,642				8,642
Fund Cash Balances, December 31	\$	8,642	\$	128,833	\$	137,475

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2016

#### 1. REPORTING ENTITY

# **Description of the Entity**

The constitution and laws of the State of Ohio establish the rights and privileges of Penn Township, Morgan County, (the Township) as a body corporate and politic. A publically-elected three-member Board of Trustees directs the Township. The Township provides road and bridge maintenance, cemetery maintenance, fire protection, and emergency medical services. The Township contracts with the Pennsville Volunteer Fire Company to provide fire and emergency medical services.

The Township participates in the Ohio Township Association Risk Management Authority (OTARMA) public entity risk pool. Note 6 to the financial statements provides additional information for this entity.

The Township's management believes these financial statements present all activities for which the Township is financially accountable.

# 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

#### A. Basis of Presentation

The Township's financial statements consist of a combined statement of receipts, disbursements and changes in fund balances (regulatory cash basis) for all governmental fund types and a combined statement of receipts, disbursements and changes in fund balances (regulatory cash basis) for all proprietary and fiduciary fund types which are organized on a fund type basis.

#### B. Fund Accounting

The Township uses funds to maintain its financial records during the year. A fund is defined as a fiscal and accounting entity with a self-balancing set of accounts. The funds of the Township are presented below:

#### **General Fund**

The General Fund accounts for and reports all financial resources not accounted for and reported in another fund. The general fund balance is available to the Township for any purpose provided it is expended or transferred according to the general laws of Ohio.

#### **Special Revenue Funds**

These funds account for and report the proceeds of specific revenue sources that are restricted or committed to expenditure for specified purposes other than debt service or capital projects. The Township had the following significant Special Revenue Funds:

**Gasoline Tax Fund** – This fund receives gasoline tax monies to pay for constructing, maintaining, and repairing Township roads.

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2016

#### 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

#### C. Basis of Accounting

These financial statements follow the accounting basis permitted by the financial reporting provisions of Ohio Revised Code Section 117.38 and Ohio Administrative Code 117-2-03(D). This basis is similar to the cash receipts and disbursements accounting basis. The Township recognizes receipts when received in cash rather than when earned, and recognizes disbursements when paid rather than when a liability is incurred. Budgetary presentations report budgetary expenditures when a commitment is made (i.e., when an encumbrance is approved).

These statements include adequate disclosure of material matters, as the financial reporting provisions of Ohio Revised Code Section 117.38 and Ohio Administrative Code 117-2-03(D) permit.

#### D. Budgetary Process

The Ohio Revised Code requires that each fund be budgeted annually.

### **Appropriations**

Budgetary expenditures (that is, disbursements and encumbrances) may not exceed appropriations at the fund, function and object level of control and appropriations may not exceed estimated resources. The Trustees must annually approve appropriation measures and subsequent amendments. Unencumbered appropriations lapse at year end.

# **Estimated Resources**

Estimated resources include estimates of cash to be received (budgeted receipts) plus unencumbered cash as of January 1. The County Budget Commission must approve estimated resources.

#### **Encumbrances**

The Ohio Revised Code requires the Township to reserve (encumber) appropriations when individual commitments are made. Encumbrances outstanding at year end are canceled, and re-appropriated in the subsequent year.

A summary of 2016 budgetary activity appears in Note 3.

#### E. Deposits and Investments

The Township's accounting basis includes investment as assets. This basis does not record disbursement for investment purchases or receipts for investment sales. This basis records gains or losses at the time of sale as receipts or disbursements, respectively.

#### F. Capital Assets

The Township records disbursements for acquisitions of property, plant and equipment when paid. The accompanying financial statements do not report these items as assets.

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2016

#### 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

#### G. Accumulated Leave

In certain circumstances, such as upon leaving employment, employees are entitled to cash payments for unused leave. The financial statements do not include a liability for unpaid leave.

# H. Fund Balance

Fund balance is divided into five classifications based primarily on the extent to which the Township must observe constraints imposed upon the use of its governmental-fund resources. The classifications are as follows:

#### **Nonspendable**

The Township classifies assets as *nonspendable* when legally or contractually required to maintain the amounts intact.

#### Restricted

Fund balance is *restricted* when constraints placed on the use of resources are either externally imposed by creditors (such as through debt covenants), grantors, contributors, or laws or regulations of other governments; or is imposed by law through constitutional provisions.

#### Committed

Trustees can *commit* amounts via formal action (resolution). The Township must adhere to these commitments unless the Trustees amend the resolution. Committed fund balance also incorporates contractual obligations to the extent that existing resources in the fund have been specifically committed to satisfy contractual requirements.

#### **Assigned**

Assigned fund balances are intended for specific purposes but do not meet the criteria to be classified as *restricted* or *committed*. Governmental funds other than the general fund report all fund balances as *assigned* unless they are restricted or committed. In the general fund, *assigned* amounts represent intended uses established by Township Trustees or a Township official delegated that authority by resolution, or by State Statute.

#### Unassigned

Unassigned fund balance is the residual classification for the general fund and includes amounts not included in the other classifications. In other governmental funds, the unassigned classification is used only to report a deficit balance.

The Township applies restricted resources first when expenditures are incurred for purposes for which either restricted or unrestricted (committed, assigned, and unassigned) amounts are available. Similarly, within unrestricted fund balance, committed amounts are reduced, first followed by assigned, and then unassigned amounts when expenditures are incurred for purposes for which amounts in any of the unrestricted fund balance classifications could be used.

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2016

#### 3. BUDGETARY ACTIVITY

Budgetary activity for the year ended December 31, 2016 is as follows:

2016 Budgeted vs. Actual Receipts

Fund Type	Budgeted Receipts	Actual Receipts	Variance
General	 58,469	\$ 44,311	\$ (14,158)
Special Revenue	183,781	130,648	(53,133)
Total	\$ 242,250	\$ 174,959	\$ (67,291)

2016 Budgeted vs. Actual Budgetary Basis Expenditures

	$A_1$	ppropriation Budgetary				
Fund Type	Authority		E	Expenditures		Variance
General	\$	77,700	\$	40,543	\$	37,157
Special Revenue		277,950		92,743		185,207
Total	\$	355,650	\$	133,286	\$	222,364

Contrary to ORC 5705.41(D), the Township made expenditures prior to certification.

Contrary to ORC 5705.39, the Gasoline Tax Fund had appropriations greater than estimated resources by \$9,945.

#### 4. EQUITY IN POOLED CASH

The Township maintains a deposit pool all funds use. The Ohio Revised Code prescribes allowable deposits and investments. The carrying amount of deposits at December 31 was as follows:

	2016
Demand Deposits	\$ 137,475
Total	\$ 137,475

**Deposits**: Deposits are either insured by the Federal Depository Insurance Corporation or collateralized by the financial institution's public entity deposit pool.

#### 5. PROPERTY TAX

Real property taxes become a lien on January 1 preceding the October 1 date for which rates are adopted by Township Trustees. The State Board of Tax Equalization adjusts these rates for inflation. Property taxes are also reduced for applicable homestead and rollback deductions. The financial statements include homestead and rollback amounts the State pays as intergovernmental receipts. Payments are due to the County by December 31. If the property owner elects to pay semiannually, the first half is due December 31. The second half payment is due the following June 20.

Public utilities are also taxed on personal and real property located within the Township.

The County is responsible for assessing property, and for billing, collecting, and distributing all property taxes on behalf of the Township.

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2016

#### 6. RISK MANAGEMENT

The Township is exposed to various risks of property and casualty losses, and injuries to employees.

The Township insures against injuries to employees through the Ohio Bureau of Workers' Compensation.

The Township belongs to the Ohio Township Association Risk Management Authority (OTARMA), a risk-sharing pool available to Ohio townships. OTARMA provides property and casualty coverage for its members. York Risk Pooling Services, Inc. (formally known as American Risk Pooling Consultants, Inc.). functions as the administrator of the Pool and provides underwriting claims, loss control, risk management, and reinsurance services for the Pool. Member governments pay annual contributions to fund OTARMA. OTARMA pays judgments, settlements and other expenses resulting from covered claims that exceed the members' deductibles.

# Casualty and Property Coverage

The Pool is a member of American Public Entity Excess Pool (APEEP), which is also administered by York. APEEP provides the Pool with an excess risk-sharing program. Under this arrangement, OTARMA retains insured risks up to an amount specified in the contracts. At December 31, 2016, OTARMA retained \$350,000 for casualty claims and \$250,000 for property claims.

The aforementioned casualty and property reinsurance agreement does not discharge OTARMA's primary liability for claims payments on covered losses. Claims exceeding coverage limits are the obligation of the respective government.

#### **Financial Position**

OTARMA's financial statements (audited by other accountants) conform with generally accepted accounting principles, and reported the following assets, liabilities and retained earnings at December 31, 2016 (the latest information available):

	2016
Assets	\$38,473,283
Liabilities	(8,244,140)
Retained Earnings	\$30,229,143

At December 31, 2016 the liabilities above include approximately \$7.4 million of estimated incurred claims payable. The assets above also include approximately \$6.9 million of unpaid claims to be billed to approximately 1,010 member governments in the future, as of December 31, 2016. These amounts will be included in future contributions from members when the related claims are due for payment. As of December 31, 2016, the Township's share of these unpaid claims collectible in future years is approximately \$1,602.

Based on discussion with OTARMA, the expected rates OTARMA charges to compute member contributions, which are used to pay claims as they become due, are not expected to change significantly from those used to determine the historical contributions detailed below. By contract, the annual liability of each member is limited to the amount of financial contributions required to be made to OTARMA for each year of membership.

Contributions to OTARMA					
2016	\$3,561				
2015	3,574				
2014	3,562				

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2016

#### 6. RISK MANAGEMENT(Continued)

After completing one year of membership, a member may withdraw on the anniversary of the date of joining OTARMA if the member notifies OTARMA in writing 60 days prior to the anniversary date. Upon withdrawal, members are eligible for a full or partial refund of their capital contributions, minus the subsequent year's contribution. Withdrawing members have no other future obligation to the pool. Also upon withdrawal, payments for all casualty claims and claim expenses become the sole responsibility of the withdrawing member, regardless of whether a claim occurred or was reported prior to the withdrawal.

# 7. DEFINED BENEFIT PENSION PLANS

Ohio Public Employees Retirement System

The Township's full-time employees belong to the Public Employees Retirement System (OPERS) of Ohio. OPERS is a cost-sharing, multiple employer plan. The Ohio Revised Code prescribes the plan benefits, which include postretirement healthcare, and survivor and disability benefits.

The Ohio Revised Code also prescribes contribution rates. For 2016, OPERS members contributed 10.0% of their gross wages and the Township contributed an amount equal to 14.0% of participant's gross salaries. The Township has paid all contributions required through December 31, 2016.

# 8. POSTEMPLOYMENT BENEFITS

OPERS offers cost-sharing, multiple-employer defined benefit postemployment plans, which include multiple health care plans including medical coverage, prescription drug coverage, deposits to a Health Reimbursement Arrangement and Medicare Part B premium reimbursements, to qualifying benefit recipients. OPERS contributes 2 percent of the employer contribution to fund these benefits.

# 9. DEBT

Debt outstanding at December 31, 2016, was as follows:

	 Principal	Interest Rate
Equipment Bonds	\$ 7,797	3.75%

The Township obtained a 5 year promissory note at First National Bank of McConnelsville to purchase a truck. The truck collateralizes the loan and will be repaid from various Funds.

Amortization of the above debt, including interest, is scheduled as follows:

Year Ending December 31:	Equip:	ment Bonds
2017	·	5,491
2018		2,847
Total	\$	8,338

# NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2016

# 10. PUBLIC ENTITY RISK POOL

The Township belongs to the Ohio Township Association Risk Management Authority (OTARMA), a risk-sharing pool available to Ohio local governments. OTARMA provides property and casualty coverage for its members. OTARMA is a member of the American Public Entity Excess Pool (APEEP). Member governments pay annual contributions to fund OTARMA. OTARMA pays judgments, settlements and other expenses resulting from covered claims exceeding the member's deductible.

#### 11. RESTATEMENT OF FUND BALANCE

Fund balances in the Special Revenue Funds have been restated for the year ended December 31, 2015 for prior audit adjustments and internal adjustments:

		Special			
	Revenue		Total		
Fund Balance at December 31, 2015	\$	88,444	\$	88,444	-
Adjustments		2,484		2,484	
Fund Balance at January 1, 2016	\$	90,928	\$	90,928	

# WILSON, PHILLIPS & AGIN, CPA'S, INC. 1100 BRANDYWINE BLVD. BUILDING G ZANESVILLE, OHIO 43701

# INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS REQUIRED BY GOVERNMENT AUDITING STANDARDS.

Penn Township Morgan County 444 Scott-Penn Lane Malta, Ohio 43758

#### To the Township Trustees:

We have audited, in accordance with auditing standards general accepted in the United States and the Comptroller General of the United States' *Government Auditing Standards*, the financial statements of Penn Township, Morgan County as of and for the years ended December 31, 2017 and 2016, and the related notes to the financial statements and have issued our report thereon dated March 21, 2018, wherein we noted the Township followed financial reporting provisions Ohio Revised Code Section 117.38 and Ohio Administrative Code Section 117-2-03(D) permit.

#### Internal Control Over Financial Reporting

As part of our financial statement audit, we considered Penn Township's internal control over financial reporting (internal control) to determine the audit procedures appropriate in the circumstances to the extent necessary to support our opinions on the financial statements, but not to the extent necessary to opine on the effectiveness of the Township's internal control. Accordingly, we have not opined on it.

Our consideration of internal control was for the limited purpose described in the first paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Therefore, unidentified material weaknesses or significant deficiencies may exist. However, as described in the accompanying schedule of findings we identified a certain deficiency in internal control over financial reporting, that we consider a material weakness.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, when performing their assigned functions, to prevent, or detect and timely correct misstatements. A *material weakness* is a deficiency, or a combination of internal control deficiencies resulting in a reasonable possibility that internal control will not prevent or detect and timely correct a material misstatement of the Township's financial statements. 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. We consider Findings 2017-001, 2017-002, and 2017-004 described in the accompanying schedule of findings to be material weaknesses.

Independent Auditors' Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Required by Government Auditing Standards Page Two

# Compliance and Other Matters

As part of obtaining reasonable assurance about whether Penn Township's financial statements are free of material misstatement, we tested its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could directly and materially affect the determination of financial statement amounts. However, opining on compliance was not an objective of our audit and, accordingly, we do not express an opinion. The results of our tests disclosed three instances of noncompliance or other matters we must report under *Government Auditing Standards* which is described in the accompanying schedule of findings as items 2017-001, 2017-003, and 2017-005.

# Purpose of this Report

This report only describes the scope of our internal control and compliance testing and our testing results, and does not opine on the effectiveness of the Township's internal control or on compliance. This report is an integral part of an audit performed under *Government Auditing Standards* in considering the Township's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Wilson, Phillips & Agin, CPA's, Inc. Zanesville, Ohio March 21, 2018

# SCHEDULE OF FINDINGS DECEMBER 31, 2017 AND 2016

# FINDINGS RELATED TO THE FINANCIAL STATEMENTS REQUIRED TO BE REPORTED IN ACCCORDANCE WITH GAGAS

#### Finding Number 2017-001

#### Noncompliance/Material Weakness

Ohio Rev. Code Section 5705.10(D) requires all revenue derived from a source other than the general property tax and which the law prescribes shall be used for a particular purpose, shall be paid into a special fund for such purpose.

During 2016, the Fiscal Officer incorrectly posted Rollback and Homestead monies to the General Fund in the amount of \$3,929 instead of the Cemetery Fund, Special Revenue Fund type, in the amount of \$1,212, the Road & Bridge Fund, Special Revenue Fund type, in the amount of \$762 and the Fire Levy Fund, Special Revenue Fund type, in the amount of \$1,955.

During 2017, the Fiscal Officer incorrectly posted Rollback and Homestead monies to the General Fund in the amount of \$4,017 instead of the Cemetery Fund, Special Revenue Fund type, in the amount of \$1,239, the Road & Bridge Fund, Special Revenue Fund type, in the amount of \$779 and the Fire Levy Fund, Special Revenue Fund type, in the amount of \$1,999.

Therefore, in 2017 and 2016, the Fiscal Officer improperly posted rollback homestead monies to the General Fund, in the amount of \$7,946 that should have posted to the Cemetery Fund, Special Revenue Fund type, in the amount of \$2,451, Road & Bridge Fund, Special Revenue Fund type, in the amount of \$1,541 and Fire Levy Fund, Special Revenue Fund type, in the amount of \$3,954. The Fiscal Officer made these adjustments to the Townships records and, therefore, these adjustments are reflected in the accompanying financial statements.

Clients Response: We received no response from the client.

#### Finding Number 2017-002

#### **Material Weakness**

All local offices should maintain an accounting system and accounting records sufficient to enable the public office to identify, assemble, analyze, classify, record and report its transactions, maintain accountability for the related assets, document compliance with finance-related legal and contractual requirements and prepare financial statements.

The Township Officer's Handbook (Revised 2017) provides suggested accounts classifications. These accounts classify receipts by fund and source (Taxes or charges for services, for example) and classify disbursements by fund, program (general government, for example) or object (personal services, for example). Using these classifications and the aforementioned accounting records will provide the Township with information required to monitor compliance with the budget, and prepare annual reports in the format required by the Auditor of State.

The Township did not properly post and classify all receipts and expenditures. Errors were made in recording various transactions. Amounts were not always posted to the correct fund and/or line item. The following adjustments and reclassifications were made.

# SCHEDULE OF FINDINGS DECEMBER 31, 2017 AND 2016

# FINDINGS RELATED TO THE FINANCIAL STATEMENTS REQUIRED TO BE REPORTED IN ACCCORDANCE WITH GAGAS

#### Finding Number 2017-002 (Continued)

#### Adjustments:

- In 2016, an adjustment was made to gross up the Real Estate Tax distribution received from the County Auditor and a corresponding expense was recorded in the following funds: General Fund, Road and Bridge, Cemetery, and Fire Levy Fund; in the amounts of: \$6,654, \$218, \$358, and \$597, respectively.
- In 2016, an adjustment was made to post Miscellaneous Receipts in the amount of \$423 and \$846 in the General Fund and Gasoline Tax Fund, respectively. This was due to an overpayment of a Federal 941 deposit from the Motor Vehicle License Tax Fund posted to Property and Other Taxes Receipts.
- In 2017, an adjustment was made to gross up the Real Estate Tax distribution received from the County Auditor and a corresponding expense was recorded in the following funds: General Fund, Road and Bridge, Cemetery, and Fire Levy Fund; in the amounts of: \$6,558, \$237, \$390, and \$656, respectively.

#### Reclassifications:

- In 2016, a reclassification from Property and Other Local taxes to Intergovernmental Receipts in the amount of \$3,047 in the General Fund.
- In 2016, a reclassification from Charges for Services to Property and Other Taxes Receipts in the amount of \$13,093 in the Fire Levy Fund.
- In 2016, a reclassification from General Government to Public Works Disbursements in the amount of \$7,132 in the Gasoline Tax Fund.
- In 2016, a reclassification from General Government to Principal Retirement and Fiscal Charges in the amounts of \$3,894 and \$156 in the General Fund and \$3,047 and \$122 in the Gasoline Tax Fund, respectively.
- In 2017, a reclassification from Property and Other Local taxes to Intergovernmental Receipts in the amount of \$1,566 in the General Fund.
- In 2017, a reclassification from Property and Other Local taxes in the General Fund to Intergovernmental Receipts in the amount of \$392, \$623, and \$1,005 for the Road and Bridge Fund, Cemetery Fund, and Fire Levy Fund, respectively.
- In 2017, a reclassification from Charges for Services to Property and Other Taxes Receipts in the amount of \$14,544 in the Fire Levy Fund.
- In 2017, a reclassification from Health Disbursements to Capital Outlay in the amounts of \$2,450 and \$2,982 in the Gasoline Tax Fund and Cemetery Fund, respectively.
- In 2017, a reclassification from General Government to Principal Retirement and Fiscal Charges in the amounts of \$988 and \$12 in the General Fund and \$988 and \$12 in the Motor Vehicle License Tax Fund, respectively.
- In 2017, a reclassification from Public Works to Principal Retirement and Fiscal Charges in the amounts of \$4,832 and \$57 in the Gasoline Tax Fund and \$989 and \$11 in the Road and Bridge Fund, respectively.

# SCHEDULE OF FINDINGS DECEMBER 31, 2017 AND 2016

# FINDINGS RELATED TO THE FINANCIAL STATEMENTS REQUIRED TO BE REPORTED IN ACCCORDANCE WITH GAGAS

#### Finding Number 2017-002 (Continued)

The adjustments with which the Township Official's agree are reflected in the accompanying financial statements and posted to the accounting records.

We recommend the Township utilize available authoritative resources to appropriately classify and record all receipt and expenditure transactions.

Client Response: We received no response from the client.

#### Finding Number 2017-003

### Noncompliance

Ohio Rev. Code § 5705.41 (D) (1) prohibits a subdivision or taxing authority from making any contract or ordering any expenditure of money unless a certificate signed by the fiscal officer is attached thereto. The fiscal officer must certify that the amount required to meet any such contract or expenditure has been lawfully appropriated and is in the treasury, or is in the process of collection to the credit of an appropriate fund free from any previous encumbrance.

There are several exceptions to the standard requirement stated above that a fiscal officer's certificate must be obtained prior to a subdivision or taxing authority entering into a contract or order involving the expenditure of money. The main exceptions are: "then and now" certificates, blanket certificates, and super blanket certificates, which are provided for in §§ 5705.41 (D) (1) and 5705.41 (D) (3), respectively, of the Ohio Revised Code.

- 1. "Then and Now" Certificate If the fiscal officer can certify that both at the time that the contract or order was made ("then"), and at the time that the fiscal officer is completing the certification ("now"), that sufficient funds were available or in the process of collection, to the credit of a proper fund, properly appropriated and free from any previous encumbrance, the Township can authorize the drawing of a warrant for the payment of the amount due. The Township has thirty days from receipt of the "then and now" certificate to approve payment by ordinance or resolution.
- 2. Amounts of less than \$3,000 may be paid by the fiscal officer without a resolution or ordinance upon completion of the "then and now" certificate, provided that the expenditure is otherwise lawful. This does not eliminate any otherwise applicable requirement for approval of expenditures by the Township.
- 3. Blanket Certificate Fiscal officers may prepare "blanket" certificates for a certain sum of money not in excess of an amount established by resolution or ordinance adopted by a majority of the members of the legislative authority against any specific line item account over a period not running beyond the current fiscal year. The blanket certificates may, but need not, be limited to a specific vendor. Only one blanket certificate may be outstanding at one particular time for any one particular line item appropriation.

# SCHEDULE OF FINDINGS DECEMBER 31, 2017 AND 2016

# FINDINGS RELATED TO THE FINANCIAL STATEMENTS REQUIRED TO BE REPORTED IN ACCCORDANCE WITH GAGAS

#### Finding Number 2017-003 (Continued)

4. Super Blanket Certificate – The Township may also make expenditures and contracts for any amount from a specific line item appropriation account in a specified fund upon certification of the fiscal officer for most professional services, fuel, oil, food items, and any other specific recurring and reasonably predictable operating expense. This certification is not to exceed beyond the current year. More than one super blanket certificate may be outstanding at a particular time for any line item appropriation.

The Fiscal Officer did not certify the availability of funds prior to purchase commitments for 24% of the expenditures tested in 2017 and 2016, and there was no evidence the Township followed the aforementioned exceptions.

Unless the exceptions noted above are used, prior certification is not only required by statute but is a key control in the disbursement process to assure that purchase commitments receive prior approval. To improve controls over disbursements and to help reduce the possibility of the Township's funds exceeding budgetary spending limitations, we recommend the Fiscal Officer certify that the funds are or will be available prior to an obligation being incurred by the Township. When prior certification is not possible, "then and now" certification should be used.

We recommend the Fiscal Officer certify purchases to which § 5705.41 (D) applies. The Fiscal Officer should sign the certification at the time the Township incurs a commitment, and only when the requirements of Ohio Revised Code § 5705.41 (D) are satisfied. The Fiscal Officer should post approved purchase commitments to the proper appropriation code, to reduce the available appropriation.

Client Response: We received no response from the client.

#### Finding Number 2017-004

#### **Material Weakness**

All local public offices should integrate the budgetary accounts, at the legal level of control or lower, into the UAN system. The UAN system should be utilized to provide ongoing and timely information on unrealized budgetary receipts.

# SCHEDULE OF FINDINGS DECEMBER 31, 2017 AND 2016

# FINDINGS RELATED TO THE FINANCIAL STATEMENTS REQUIRED TO BE REPORTED IN ACCCORDANCE WITH GAGAS

#### Finding Number 2017-004 (Continued)

#### **Material Weakness**

At December 31, 2016, estimated receipts as certified by the County Budget Commission did not agree to the Township's ledgers for the following funds:

	Estimated Receipts per	Estimated Receipts per	
Fund	Budget Commission	UAN Revenue Status Report	Variance
General	\$ 58,469	\$ 58,563	\$ (94)
MVL Tax	9,690	9,695	(5)
Gasoline Tax	87,565	87,570	(5)
Road & Bridge	4,944	4,527	417
Cemetery	67,178	9,341	57,837
Fire Levy	14,404	36,983	(22,579)

Without information properly entered into the system, the management of the Township lost some degree of budgetary control. This also resulted in audit adjustments to the budgetary note disclosure.

We recommend the Fiscal Officer accurately post estimated receipts as approved by the County Budget Commission into the computer system. This procedure will help ensure more useful comparisons of budget versus actual activity, as well as provide management with an accurate monitoring tool throughout the year.

Client Response: We received no response from the client.

# Finding Number 2017-005

# Noncompliance – Appropriations Exceeding Estimated Resources

Ohio Revised Code Section 5705.39 provides that total appropriations from each fund shall not exceed the total of the estimated revenues available for expenditure as certified by the budget commission. In addition, no appropriation measure is to become effective until the County Auditor files a certificate that the total appropriations from each fund do not exceed the total estimate or amended official estimate.

		Estimated		
Fund	Year	Resources	Appropriations	Variance
Gasoline Tax	2016	\$ 143,555	\$ 153,500	\$ (9,945)

We recommend Trustees review estimated resources versus appropriations throughout the year. Also, Trustees should not approve appropriations greater than estimated resources. This could result in the Township spending more money than it receives and could cause possible negative fund balances.

Client Response: We received no response from the client.

# SCHEDULE OF PRIOR AUDIT FINDINGS YEAR ENDED DECEMBER 31, 2017 AND 2016

Finding Number	Finding Summary	Fully Corrected	Not Corrected, Partially Corrected Significantly Different Corrective Action Taken; or Finding No Longer Valid; Explain:
2015-001	Material Weakness Noncompliance ORC 5705.10(D) improper posting of receipts	No	Not Corrected: Cited in current report as finding 2017-001
2015-002	Material Weakness bank Reconciliations with Other Adjusting Factors	No	Partially Corrected; included in Management Letter
2015-003	Noncompliance ORC 5705.41(D) expenditures prior to certifications	No	Not Corrected: Cited in current report as finding 2017-003
2015-004	Material Weakness Budgetary Postings	No	Not Corrected: Cited in current report as finding 2017-004
2015-005	Noncompliance ORC 505.24 Payroll certifications	Yes	Finding No Longer Valid





#### **PENN TOWNSHIP**

# **MORGAN 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.

**CLERK OF THE BUREAU** 

Susan Babbitt

CERTIFIED NOVEMBER 27, 2018