REPORT OF THE AUDIT OF THE FLEMING COUNTY CLERK

For The Year Ended December 31, 2015



MIKE HARMON AUDITOR OF PUBLIC ACCOUNTS

www.auditor.ky.gov

209 ST. CLAIR STREET FRANKFORT, KY 40601-1817 TELEPHONE (502) 564-5841 FACSIMILE (502) 564-2912

EXECUTIVE SUMMARY

AUDIT OF THE FLEMING COUNTY CLERK

For The Year Ended December 31, 2015

The Auditor of Public Accounts has completed the Fleming County Clerk's audit for the year ended December 31, 2015. Based upon the audit work performed, the financial statement presents fairly in all material respects, the receipts, disbursements, and excess fees in conformity with the regulatory basis of accounting.

Financial Condition:

Excess fees increased by \$8,369 from the prior year, resulting in excess fees of \$94,115 as of December 31, 2015. Receipts increased by \$182,264 from the prior year and disbursements increased by \$173,895.

Report Comments:

2015-001 Delinquent Taxes Were Not Distributed Properly
 2015-002 The County Clerk's Office Lacks Adequate Segregation Of Duties

Lease Agreements:

The county clerk is committed to lease agreements totaling \$2,750. Future payments totaling \$2,750 are needed to meet these obligations.

Deposits:

The county clerk's deposits were insured and collateralized by bank securities.

CONTENTS THE	D . CT
<u>CONTENTS</u>	PAGE

INDEPENDENT AUDITOR'S REPORT	1
STATEMENT OF RECEIPTS, DISBURSEMENTS, AND EXCESS FEES - REGULATORY BASIS4	4
Notes To Financial Statement	7
REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF THE FINANCIAL	
STATEMENT PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS13	3
COMMENTS AND RECOMMENDATIONS	7



MIKE HARMON AUDITOR OF PUBLIC ACCOUNTS

The Honorable Larry Foxworthy, Fleming County Judge/Executive The Honorable Jarrod Fritz, Fleming County Clerk Members of the Fleming County Fiscal Court

Independent Auditor's Report

Report on the Financial Statement

We have audited the accompanying Statement of Receipts, Disbursements, and Excess Fees - Regulatory Basis of the County Clerk of Fleming County, Kentucky, for the year ended December 31, 2015, and the related notes to the financial statement.

Management's Responsibility for the Financial Statement

Management is responsible for the preparation and fair presentation of this financial statement in accordance with accounting practices prescribed or permitted by the laws of Kentucky to demonstrate compliance with the Commonwealth of Kentucky's regulatory basis of accounting as described in Note 1. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of a financial statement that is free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on this financial statement based on our audit. We conducted our audit 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 the *Audit Guide for County Fee Officials* issued by the Auditor of Public Accounts, Commonwealth of Kentucky. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free from material misstatement.

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

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



The Honorable Larry Foxworthy, Fleming County Judge/Executive The Honorable Jarrod Fritz, Fleming County Clerk Members of the Fleming County Fiscal Court

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

As described in Note 1 of the financial statement, the financial statement is prepared by the Fleming County Clerk on the basis of the accounting practices prescribed or permitted by the laws of Kentucky to demonstrate compliance with the Commonwealth of Kentucky's regulatory basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America.

The effects on the financial statement 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 presumed to be material.

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 statement referred to above does not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of each fund of the Fleming County Clerk, as of December 31, 2015, or changes in financial position or cash flows thereof for the year then ended.

Opinion on Regulatory Basis of Accounting

In our opinion, the financial statement referred to above presents fairly, in all material respects, the receipts, disbursements, and excess fees of the Fleming County Clerk for the year ended December 31, 2015, in accordance with the basis of accounting practices prescribed or permitted by the Commonwealth of Kentucky as described in Note 1.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated January 25, 2017 on our consideration of the Fleming County Clerk's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the 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 entity's internal control over financial reporting and compliance.

The Honorable Larry Foxworthy, Fleming County Judge/Executive The Honorable Jarrod Fritz, Fleming County Clerk Members of the Fleming County Fiscal Court

Other Reporting Required by Government Auditing Standards (Continued)

Based on the results of our audit, we have presented the accompanying comments and recommendations, included herein, which discusses the following report comments:

2015-001 Delinquent Taxes Were Not Distributed Properly
 2015-002 The County Clerk's Office Lacks Adequate Segregation Of Duties

Respectfully submitted,

Mike Harmon

Auditor of Public Accounts

January 25, 2017

FLEMING COUNTY JARROD FRITZ, COUNTY CLERK STATEMENT OF RECEIPTS, DISBURSEMENTS, AND EXCESS FEES - REGULATORY BASIS

For The Year Ended December 31, 2015

Receipts			
State Revenue Supplement		\$	65,767
State Fees For Services			4,126
Fiscal Court			800
	525,875 1,566,965 1,320,719 925		
Other- Fish and Game Licenses Marriage Licenses Deed Transfer Tax Delinquent Tax	7,794 4,295 37,613 143,695	3,	,607,881
Fees Collected for Services: Recordings- Deeds, Easements, and Contracts Real Estate Mortgages Chattel Mortgages and Financing Statements Powers of Attorney Affordable Housing Trust All Other Recordings Charges for Other Services- Copywork Postage	9,250 18,253 49,736 732 13,962 13,366 1,036 1,873		108,208
Other: Child Victim Fund Lien Release Fees Miscellaneous Income Refunds/Overpayments Interest Earned	100 8,248 996 10,988		20,332
Total Receipts		3,	807,796

FLEMING COUNTY JARROD FRITZ, COUNTY CLERK STATEMENT OF RECEIPTS, DISBURSEMENTS, AND EXCESS FEES - REGULATORY BASIS For The Year Ended December 31, 2015 (Continued)

Disbursements

Payments to State:		
Motor Vehicle-		
Licenses and Transfers	\$ 367,219	
Usage Tax	1,519,956	
Tangible Personal Property Tax	453,594	
Licenses, Taxes, and Fees-		
Fish and Game Licenses	7,448	
Delinquent Tax	13,773	
Legal Process Tax	14,696	
Affordable Housing Trust	13,950	\$ 2,390,636
Payments to Fiscal Court:		
Tangible Personal Property Tax	139,397	
Delinquent Tax	17,918	
Deed Transfer Tax	35,732	193,047
Payments to Other Districts:		
Tangible Personal Property Tax	673,063	
Delinquent Tax	67,028	740,091
Payments to Sheriff		12,447
Payments to County Attorney		18,566
Operating Disbursements:		
Personnel Services-		
Deputies' Salaries	192,245	
Advertising	1,813	
Printing and Binding	21,810	
Materials and Supplies-		
Office Supplies	19,799	
Other Charges-		
Conventions and Travel	4,557	
Dues	246	
Postage	5,803	
Postage	3,005	
Bank Charges	297	
Refunds	14,934	
Insurance and Bonds	29	
Miscellaneous	534	265,072

FLEMING COUNTY JARROD FRITZ, COUNTY CLERK

STATEMENT OF RECEIPTS, DISBURSEMENTS, AND EXCESS FEES - REGULATORY BASIS For The Year Ended December 31, 2015 (Continued)

Disbursements (Continued)

Debt Service:		
Lease Purchases	\$ 3,529	
Total Disbursements		\$ 3,623,388
		, ,
Net Receipts		184,408
Less: Statutory Maximum		82,752
		101.656
Excess Fees		101,656
Less: Expense Allowance	3,600	
Training Incentive Benefit	 3,941	7,541
Excess Fees Due County for 2015		94,115
Payments to Fiscal Court - December 29, 2015	50,000	
February 10, 2016	25,000	75,000
Balance Due Fiscal Court at Completion of Audit *		\$ 19,115

^{* -} The county clerk presented a check to the fiscal court for excess fees on January 25, 2017.

FLEMING COUNTY NOTES TO FINANCIAL STATEMENT

December 31, 2015

Note 1. Summary of Significant Accounting Policies

A. Fund Accounting

A fee official uses a fund to report on the results of operations. A fund is a separate accounting entity with a self-balancing set of accounts. Fund accounting is designed to demonstrate legal compliance and to aid financial management by segregating transactions related to certain government functions or activities.

A fee official uses a fund for fees to account for activities for which the government desires periodic determination of the excess of receipts over disbursements to facilitate management control, accountability, and compliance with laws.

B. Basis of Accounting

KRS 64.820 directs the fiscal court to collect any amount, including excess fees, due from the county clerk as determined by the audit. KRS 64.152 requires the county clerk to settle excess fees with the fiscal court by March 15 each year.

The financial statement has been prepared on a regulatory basis of accounting, which demonstrates compliance with the laws of Kentucky and is a special purpose framework. Under this regulatory basis of accounting, receipts and disbursements are generally recognized when cash is received or disbursed with the exception of accrual of the following items (not all-inclusive), at December 31 that may be included in the excess fees calculation:

- Interest receivable
- Collection on accounts due from others for 2015 services
- Reimbursements for 2015 activities
- Payments due other governmental entities for December tax and fee collections and payroll
- Payments due vendors for goods or services provided in 2015

The measurement focus of a fee official is upon excess fees. Remittance of excess fees is due to the county treasurer in the subsequent year.

C. Cash and Investments

KRS 66.480 authorizes the county clerk's office to invest in obligations of the United States and of its agencies and instrumentalities, obligations and contracts for future delivery or purchase of obligations backed by the full faith and credit of the United States, obligations of any corporation of the United States government, bonds or certificates of indebtedness of this state, and certificates of deposit issued by or other interest-bearing accounts of any bank or savings and loan institution which are insured by the Federal Deposit Insurance Corporation (FDIC) or which are collateralized, to the extent uninsured, by any obligation permitted by KRS 41.240(4).

FLEMING COUNTY NOTES TO FINANCIAL STATEMENT December 31, 2015 (Continued)

Note 2. Employee Retirement System and Other Post-Employment Benefits

The county official and employees have elected to participate in the County Employees Retirement System (CERS), pursuant to KRS 78.530 administered by the Board of Trustees of the Kentucky Retirement Systems (KRS). This is a cost sharing, multiple employer defined benefit pension plan, which covers all eligible full-time employees and provides for retirement, disability and death benefits to plan members. Benefit contributions and provisions are established by statute.

Nonhazardous covered employees are required to contribute five percent of their salary to the plan. Nonhazardous covered employees who begin participation on or after September 1, 2008 are required to contribute six percent of their salary to the plan. The county's contribution rate for nonhazardous employees was 17.67 percent for the first six months and 17.06 percent for the last six months.

In accordance with Senate Bill 2, signed by the Governor on April 4, 2014, plan members who began participating on, or after, January 1, 2014, were required to contribute to the Cash Balance Plan. The Cash Balance Plan is known as a hybrid plan because it has characteristics of both a defined benefit plan and a defined contribution plan. Members in the plan contribute a set percentage of their salary each month to their own accounts. Members contribute five percent (nonhazardous) of their annual creditable compensation and one percent to the health insurance fund which is not credited to the member's account and is not refundable. The employer contribution rate is set annually by the Board based on an actuarial valuation. The employer contributes a set percentage of the member's salary. Each month, when employer contributions are received, an employer pay credit is deposited to the member's account. A member's account is credited with a four percent (nonhazardous) employer pay credit. The employer pay credit represents a portion of the employer contribution.

Benefits fully vest on reaching five years of service for nonhazardous employees. Aspects of benefits for nonhazardous employees include retirement after 27 years of service or age 65. Nonhazardous employees who begin participation on or after September 1, 2008 must meet the rule of 87 (member's age plus years of service credit must equal 87, and the member must be a minimum of 57 years of age) or the member is age 65, with a minimum of 60 months service credit.

CERS also provides post-retirement health care coverage as follows:

For members participating prior to July 1, 2003, years of service and respective percentages of the maximum contribution are as follows:

		% Paid by Member through
Years of Service	% paid by Insurance Fund	Payroll Deduction
20 or more	100%	0%
15-19	75%	25%
10-14	50%	50%
4-9	25%	75%
Less than 4	0%	100%

FLEMING COUNTY NOTES TO FINANCIAL STATEMENT December 31, 2015 (Continued)

Note 2. Employee Retirement System and Other Post-Employment Benefits (Continued)

As a result of House Bill 290 (2004 General Assembly), medical insurance benefits are calculated differently for members who began participation on or after July 1, 2003. Once members reach a minimum vesting period of ten years, non-hazardous employees whose participation began on or after July 1, 2003, earn ten dollars per month for insurance benefits at retirement for every year of earned service without regard to a maximum dollar amount. This dollar amount is subject to adjustment annually based on the retiree cost of living adjustment, which is updated annually due to changes in the Consumer Price Index.

Historical trend information showing the CERS' progress in accumulating sufficient assets to pay benefits when due is presented in the Kentucky Retirement Systems' annual financial report. This report may be obtained by writing the Kentucky Retirement Systems, 1260 Louisville Road, Frankfort, KY 40601-6124, or by telephone at (502) 564-4646.

Note 3. Deposits

The Fleming County Clerk maintained deposits of public funds with depository institutions insured by the Federal Deposit Insurance Corporation (FDIC) as required by KRS 66.480(1)(d). According to KRS 41.240, the depository institution should pledge or provide sufficient collateral which, together with FDIC insurance, equals or exceeds the amount of public funds on deposit at all times. In order to be valid against the FDIC in the event of failure or insolvency of the depository institution, this pledge or provision of collateral should be evidenced by an agreement between the county clerk and the depository institution, signed by both parties, that is (a) in writing, (b) approved by the board of directors of the depository institution or its loan committee, which approval must be reflected in the minutes of the board or committee, and (c) an official record of the depository institution.

Custodial Credit Risk - Deposits

Custodial credit risk is the risk that in the event of a depository institution failure, the county clerk's deposits may not be returned. The Fleming County Clerk does not have a deposit policy for custodial credit risk but rather follows the requirements of KRS 66.480(1)(d) and KRS 41.240. As of December 31, 2015, all deposits were covered by FDIC insurance or a properly executed collateral security agreement.

Note 4. Lease Agreements

- A. On January 18, 2010, the Fleming County Clerk's office entered into hardware maintenance agreement, to be completed on January 17, 2015 and is annually renewable thereafter. The agreement requires annual payments of \$3,585. The outstanding balance as of December 31, 2015 was \$0.
- B. On January 18, 2010, the Fleming County Clerk's office entered into a software licensing agreement to be completed January 17, 2015 and is annually renewable thereafter. On March 3, 2011, the county clerk added use of another terminal to the agreement. This agreement supersedes all previous software agreements. The updated agreement requires monthly payments of \$2,025. The outstanding balance as of December 31, 2015 was \$0.

FLEMING COUNTY NOTES TO FINANCIAL STATEMENT December 31, 2015 (Continued)

Note 4. Lease Agreements (Continued)

C. The Fleming County Clerk's office is committed to a lease agreement for a copier. The agreement requires monthly payments of \$275 for 60 months to be completed in October 2016. The outstanding balance as of December 31, 2015 was \$2,750.

REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF THE FINANCIAL STATEMENT PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS



MIKE HARMON AUDITOR OF PUBLIC ACCOUNTS

The Honorable Larry Foxworthy, Fleming County Judge/Executive The Honorable Jarrod Fritz, Fleming County Clerk Members of the Fleming County Fiscal Court

> Report On Internal Control Over Financial Reporting And On Compliance And Other Matters Based On An Audit Of The Financial Statement Performed In Accordance With *Government Auditing Standards*

Independent Auditor's Report

We have audited, in accordance with 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 Statement of Receipts, Disbursements, and Excess Fees - Regulatory Basis of the Fleming County Clerk for the year ended December 31, 2015, and the related notes to the financial statement and have issued our report thereon dated January 25, 2017. The Fleming County Clerk's financial statement is prepared on a regulatory basis of accounting, which demonstrates compliance with the Commonwealth of Kentucky's regulatory basis of accounting and budget laws, which is a basis of accounting other than accounting principles generally accepted in the United States of America.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statement, we considered the Fleming County Clerk'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 statement, but not for the purpose of expressing an opinion on the effectiveness of the Fleming County Clerk's internal control. Accordingly, we do not express an opinion on the effectiveness of the Fleming County Clerk'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 statement 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 over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses.



WWW.AUDITOR.KY.GOV

Report On Internal Control Over Financial Reporting And On Compliance And Other Matters Based On An Audit Of The Financial Statement Performed In Accordance With *Government Auditing Standards* (Continued)

Internal Control over Financial Reporting (Continued)

However, material weaknesses may exist that have not been identified. We identified certain deficiencies in internal control, which are described in the accompanying comments and recommendations as items 2015-001 and 2015-002 that we consider to be significant deficiencies.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Fleming County Clerk's financial statement is free of 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 matters that is required to be reported under *Government Auditing Standards* and which is described in the accompanying comments and recommendations as item 2015-001.

Purpose of this Report

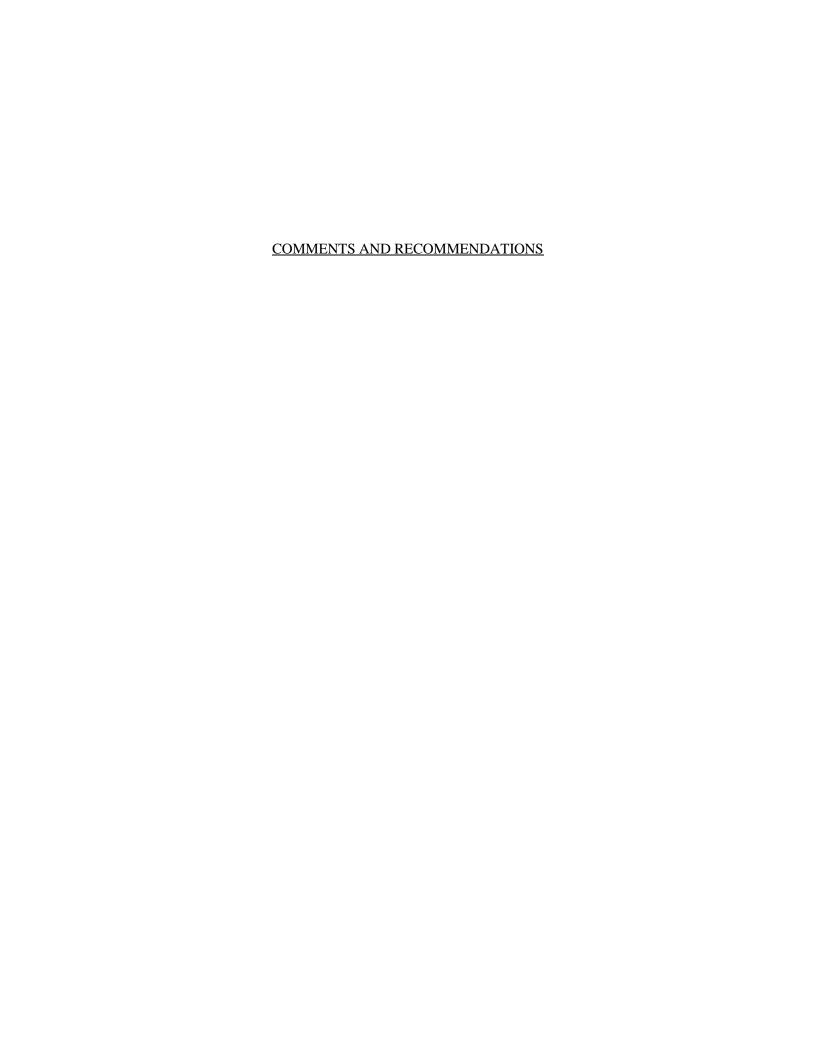
The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Respectfully submitted,

Mike Harmon

Auditor of Public Accounts

January 25, 2017



FLEMING COUNTY JARROD FRITZ, COUNTY CLERK COMMENTS AND RECOMMENDATIONS

For The Year Ended December 31, 2015

FINANCIAL STATEMENT FINDINGS:

2015-001 Delinquent Taxes Were Not Distributed Properly

During testing of delinquent tax reports, we noted that the clerk did not pay delinquent taxes correctly during the 2015 calendar year. For January, the board of education was not paid the delinquent taxes it was owed. The county attorney was not paid the full amount of delinquent taxes owed for March, September, and December. The sheriff was underpaid delinquent taxes for September and December. We also noted errors of less than \$10 each that occurred in April, August, and October. These errors appear to be caused by a lack of attention to detail and no review of the monthly delinquent tax reports and payments.

The printed monthly reports are not retained by the county clerk. If copies of the monthly reports and checks were kept together and presented for someone to review, the board of education payment for January would not have been omitted. There were multiple reports prepared each month for delinquent taxes. Sometimes the wrong report was used to determine payment, which is what caused the underpayments to the county attorney and sheriff. The county clerk's lack of attention to detail and reviews resulted in the following amounts owed: board of education \$135.63; county attorney - \$440.96; and sheriff - \$128.23. The errors of less than \$10 affected the county and Fox Creek Watershed. The largest of these was a \$9 payment to the Fox Creek Watershed that should have gone to the county. These entities were deprived of the ability to use the funds they were owed in a timely manner and, in the case of Fox Creek Watershed, received funds that did not belong to them. Both overpayments and underpayments to taxing districts and other parties result in additional time spent correcting errors.

KRS 134.126 requires the county clerk to pay the county, taxing districts, and other persons entitled to all moneys received for them through the collection of delinquent taxes. The county clerk writes the monthly delinquent tax checks to the taxing districts, sheriff, and county attorney after printing the monthly delinquent tax reports, but the reports and checks are not reviewed by anyone other than the county clerk, resulting in errors that go undetected until the audit. We recommend the county clerk pay the board of education, county attorney, and sheriff the amounts they are owed and pay closer attention when preparing delinquent tax payments in future. We further recommend the county clerk have someone compare the checks to the monthly reports before they are distributed to the taxing districts and other parties. Because these errors occurred in at least four different months, and have been reported on in previous years, this is a consistent problem. If someone had compared the payments to the monthly reports prior to distribution, these errors most likely would not have occurred.

County Clerk's Response: No response.

FLEMING COUNTY JARROD FRITZ, COUNTY CLERK COMMENTS AND RECOMMENDATIONS For The Year Ended December 31, 2015 (Continued)

FINANCIAL STATEMENT FINDINGS: (Continued)

2015-002 The County Clerk's Office Lacks Adequate Segregation Of Duties

The Fleming County Clerk's office lacks adequate segregation of duties. A deputy clerk prepares the bank reconciliations. This is not documented, nor is a review by the county clerk documented. The county clerk or one of two deputies prepares checks for all disbursements and posts to the disbursements ledger. There is no documentation that this work is reviewed, and posting errors have occurred. The county clerk and two deputies are the authorized check signers and only one signature is required on checks. If the county clerk does not sign the check, deputies type or write the county clerk's name on one line and sign below him. This does not improve internal controls. The lack of adequate segregation of duties can result in undetected misstatements and inaccurate financial reporting. To adequately protect assets, effective segregation of duties involving deposit preparation, recording of receipts, reconciling the bank account, and posting disbursements to ledgers is essential. Additionally, proper segregation of duties protects employees in the normal course of performing their daily responsibilities. Good internal controls dictate that duties should be adequately segregated or compensating controls implemented to ensure accurate financial reporting. We recommend the county clerk segregate duties or implement strong compensating controls to mitigate risks. If duties cannot be adequately segregated due to a limited number of staff, compensating controls are necessary. The county clerk may choose to implement the following compensating controls:

- The county clerk should review the deputy clerk's bank reconciliations for accuracy and compare to the ledgers and ending financial statement balances.
- The county clerk or another deputy should review disbursements ledger postings.
- The county clerk could require dual signatures on checks or sign all checks himself.

The reviews should be documented in writing, detailing who performed the reconciliation and review.

County Clerk's Response: No response.