

## **Lakeshore Regional Entity**

### **Financial Statements**

*September 30, 2019*



Lakeshore Regional Entity  
Table of Contents  
September 30, 2019

---

**Independent Auditor's Report**

<b>Management's Discussion and Analysis .....</b>	<b>I-V</b>
---	------------

**Basic Financial Statements**

Statement of Net Position .....	1
---------------------------------	---

Statement of Revenues, Expenses and Changes in Net Position.....	2 - 3
--	-------

Statement of Cash Flows .....	4
-------------------------------	---

<b>Notes to the Financial Statements .....</b>	<b>5 – 15</b>
--	---------------

<b>Government Auditing Standards Report.....</b>	<b>16</b>
--	-----------

<b>Federal Awards Supplementary Information.....</b>	<b>Issued Under Separate Cover</b>
--	--



## **Independent Auditor's Report**

To the Members of the Board  
Lakeshore Regional Entity  
Norton Shores, Michigan

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

We have audited the accompanying financial statements of the business-type activities, each major fund, and the aggregate remaining fund information of Lakeshore Regional Entity (the Entity), as of and for the year ended September 30, 2019, and the related notes to the financial statements, which collectively comprise the Entity's basic financial statements as listed in the table of contents.

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

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

### ***Auditor's Responsibility***

Our responsibility is to express opinions on these financial statements based on our audit. We conducted our audit 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. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

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

### ***Opinions***

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the business-type activities, each major fund, and the aggregate remaining fund information of the Entity, as of September 30, 2019, and the respective changes in financial position, and, where applicable, cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

### ***Emphasis of Matter***

The accompanying financial statements have been prepared assuming that Lakeshore Regional Entity will continue as a going concern. As discussed in Note 18 to the financial statements, Lakeshore Regional Entity has a deficit net position of \$(24,884,178) and has incurred substantial annual deficits in the last two fiscal years which raises substantial doubt about its ability to continue as a going concern. These financial statements do not include any adjustments that might result from the outcome of this uncertainty. Our opinion is not modified with respect to this matter.

## **Other Matters**

### *Required Supplementary Information*

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

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

In accordance with *Government Auditing Standards*, we have also issued our report dated May 28, 2020, on our consideration of the Entity'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 effectiveness of the Entity's 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.

Sincerely,

A handwritten signature in cursive script that reads "Roslund, Prestage & Company, P.C.".

Roslund, Prestage & Company, P.C.  
Certified Public Accountants

May 28, 2020

## **MANAGEMENT'S DISCUSSION AND ANALYSIS**



## **Lakeshore Regional Entity Management's Discussion and Analysis**

The summary financial information contained in this analysis is presented for the twelve-month period of October 1, 2018 through September 30, 2019. This analysis will help provide a context for the reader and assist in understanding the financial position of Lakeshore Regional Entity (LRE).

During fiscal year 2019, LRE completed its fifth full fiscal year of operations as a Prepaid Inpatient Health Plan (PIHP). There are five (5) Community Mental Health Service Programs (CMHSPs) associated with LRE consisting of Allegan Community Mental Health Authority, Healthwest (Muskegon County), Network 180 (Kent County), Ottawa Community Mental Health, and West Michigan Community Mental Health Authority covering seven (7) counties in West Michigan.

### **Financial Highlights**

- No reserves for Medicaid and Healthy Michigan exist. They were used in their entirety in FY 17.
- Net position at the end of the year was (\$24,884,178). Medicaid and Healthy Michigan Plan services exceeded revenue from MDHHS by \$18,192,115 in FY19.
- Medicaid and Healthy Michigan funding received from MDHHS is remitted to the CMHSPs within our region, upon receipt, net of taxes and LRE administrative costs. Funds received for Substance Abuse Prevention and Treatment (SAPT) services are disbursed in the same manner as described above however LRE contracts with four CMHSPs in the region to manage the Treatment service array.

### **Operational Highlights**

- During this fiscal year, the LRE appointed a new, permanent Chief Executive Officer (CEO) after having a Transitional Manager and 2 interim CEOs during the course of last fiscal year.
- In August 2018, the LRE Board approved the retention of an actuary to make the recommendation for allocation of funds among the CMHSP members based on a sound actuarial assessment of relevant risk factors. A selection was made, and contract issued. The LRE received its initial risk-based funding allocation model from Milliman, Inc. of Wisconsin. The CMHSP members, LRE, and Beacon continue to engage in discussions with Milliman to fully understand the model and methodology used before proceeding with full implementation.
- This fiscal year the LRE contracted with Beacon Health Options to manage several delegated functions for the region. The contract begun on January 1, 2019. Leadership from Beacon, LRE, and CMHSPs met regularly to discuss regional goals, objectives, challenges, solutions, and concerns. We see good collaboration and movement forward with our Beacon contract. Strategic planning sessions also took place and were incorporated as part of the basis for renewing our contract in FY20.
- In December 2018, the LRE made significant staffing reductions because of its new contract with Beacon. The remaining LRE staff manage functions not delegated to Beacon, assure MDHHS requirements are met, and provide oversight and collaboration with our contractual partners at the CMHSPs and Beacon. Transition meetings occurred on a variety of functional areas including utilization management, clinical tools, quality improvement, provider network, integrated care, compliance, and communications. The LRE and CMHSP staff worked diligently with Beacon's implementation team to make the transition as seamless as possible.
- On June 28, 2019 MDHHS notified the LRE of its intent to terminate its contract with the LRE. The letter stated that despite LRE efforts to improve managed care functions, the contract would be cancelled for failure to address financial risk for the region. In fiscal year 2020, several actions have taken place in response to the action.
  - The LRE requested an administrative hearing, and a hearing with the Administrative Law Judge was scheduled for October 17, 2019. However, in September of 2019 MDHHS reached out to the LRE with the intent of working out a settlement agreement that would address their concerns moving forward and allow continuation of the contract with LRE. A deferral of the hearing with the ALJ was requested and received.
  - The first meeting occurred on September 23, 2019 with representatives from MDHHS, LRE and its Board, Beacon Health Options, and CMHSPs. Throughout the duration of 2019 progress was made on terms of an agreement. Several issues, Board governance and past financial deficits, remained under negotiation with MDHHS going into 2020. In March 2020

## **Lakeshore Regional Entity Management's Discussion and Analysis**

these negotiation meetings were deferred due to the urgency of the COVID-19 pandemic. The hearing remains on deferral with updates to the ALJ every two months.

- For fiscal year 2020 the revenue allocation model for PIHPs was altered based on feedback from the PIHPs and CMHSPs. The changes in the methodology have significantly improved the financial status of the LRE for this fiscal year, and current estimates show a projected surplus of over 6 million. The LRE is continuing forward with month to month contracts with MDHHS. No additional settlement negotiation meetings are scheduled at this point; however, LRE expects that these will be rescheduled dependent on State COVID-19 response concerns.

### **Overview of Financial Statements**

LRE's financial statements comprise two components:

1. Proprietary Funds financial statements
2. Notes to the financial statements

Proprietary Fund financial statements are designed to provide readers with a broad overview of the organization's finances in a manner similar to a private sector business. Business type activities include services primarily funded through user charges.

**The Statement of Net Position** presents information on all of the Authority's assets and liabilities with the difference between assets and liabilities being reported as net position. Changes in net position serve as a useful indicator in determining whether the financial position is improving or deteriorating.

**The Statement of Revenues, Expenses, and Changes in Net Position** presents information showing how net position changed during the fiscal year. Reporting of activities is on an accrual basis meaning that the change in net position is reported as soon as the underlying event giving rise to the change occurs regardless of the timing of the related movement of cash.

**The Statement of Cash Flows** is a financial statement that shows how changes in balance sheet accounts and income affect cash and cash equivalents, and breaks the analysis down to operating, investing and financing activities. The statement captures both the current operating results and the accompanying changes in the balance sheet. As an analytical tool, the statement of cash flows is useful in determining the short-term viability of a company, particularly its ability to pay bills.

### **Fund Financial Statements**

A fund is a grouping of related accounts that is used to maintain control over resources segregated for specific activities or objectives. The Entity, similar to state and local governments, uses fund accounting to ensure and demonstrate compliance with finance-related legal requirements. All of the funds of the Entity may be divided into two categories: The Enterprise Fund and the Internal Service Fund.

# Lakeshore Regional Entity Management's Discussion and Analysis

**Proprietary Funds - Enterprise Funds – Proprietary funds are used to account for the Entity’s business-type activities.**

Enterprise funds account for revenues and expenditures in a separate fund with its own financial statements rather than being commingled with revenue and expenses of the internal service fund. LRE currently has one Enterprise fund in which all financial transactions occur. At year end, activity associated with the Internal Service Fund is reported separately as referenced below, however the current general ledger system does not reflect these separate and distinct funds.

The Entity adopts an annual budget for its Enterprise Fund and tracks variances between anticipated versus actual revenue and expenditures.

## **Proprietary Funds – Internal Service Funds**

Proprietary funds are used to account for the Entity’s business-type activities. The Risk Reserve Funds are used to account for assets held as a reserve against potential liabilities relative to and as allowed by its contract with the Michigan Department of Health and Human Services (MDHHS). The Entity submitted a risk management plan to MDHHS for approval but was unable to secure all planned funding to cover its liabilities for this fiscal year.

## **Notes to Financial Statements**

The notes provide additional information essential to a full understanding of the data provided in the government- wide and fund financial statements. The accompanying notes are an integral part of the financial statements and must be reviewed in conjunction with the information reported on the financial statements to provide a full understanding of the Entity’s financial situation.

## **Proprietary Funds Financial Analysis**

### **Summary of Net Position**

The following summarizes the assets, deferred outflows of resources, liabilities and net position on an agency-wide basis for the years ended September 30, 2019 and September 30, 2018.

<b>STATEMENT OF NET POSITION</b>		
	2019	2018
Cash and cash equivalents	\$14,057,568	\$17,886,030
Restricted & other current assets	1,194,604	1,521,284
Due from other governmental units	<u>37,515,277</u>	<u>44,603,764</u>
Total Assets	52,767,449	64,011,078
Payables	3,341,833	2,234,952
Unearned Revenue	8,500,970	7,504,430
Due to other governmental units	<u>65,808,825</u>	<u>63,581,420</u>
Total Liabilities	77,651,628	73,320,802
Restricted for risk management	0.00	0.00
Net Investment in capital assets	35,700	79,358
Unrestricted	(24,919,878)	(9,389,082)
Total Net Position	<u>(\$24,884,178)</u>	<u>(\$9,309,724)</u>

Assets consist of Medicaid, Healthy Michigan, and PA2 Savings. Assets also consist of amounts due from MDHHS and



## Lakeshore Regional Entity Management's Discussion and Analysis

CMHSPs within our region. Liabilities consist of accruals for vendor payables, payroll, and compensated absences, as well as Healthy Michigan and PA2 reserves (unearned revenue). Liabilities also include funds due to MDHHS and CMHSPs within our region.

### Summary of Activities

The following summarizes the revenues, expenses and changes in net position on an agency-wide basis for the years ended September 30, 2019 and September 30, 2018.

<b>CHANGES IN NET POSITION</b>		
	2019	2018
Interest	\$ 21,065	\$ 17,456
Local Match Drawdown	2,556,372	2,556,372
State Funding	294,826,081	280,647,464
Federal Funding	<u>9,078,753</u>	<u>8,105,182</u>
Total Revenue	306,482,271	291,326,474
 Taxes and Fees	 12,843,649	 7,263,857
Local Match Drawdown	2,556,372	2,556,372
Payments to CMHSP's	294,099,803	285,784,140
Payments for SUD Prevention	3,697,855	3,180,637
PIHP Operations	<u>9,773,077</u>	<u>5,398,606</u>
Total Expenses	322,970,756	304,183,612
 Transfer In/(Out):		
Med Savings/ISF Transfer In	0	0
 Change in net position	(16,488,486)	(12,857,138)
Legislative Supplemental	0	3,500,000
Beginning Net Position	(9,309,724)	47,414
 Total Net Position	<u>\$ (24,884,178)</u>	<u>\$ (9,309,724)</u>

Revenue consists of Medicaid, DHS Incentive, Habilitations Supports Waiver, Healthy Michigan, Autism, PA2 and Community Grant. Expenses consist of PIHP operations, payments to member CMHSPs, payments to Prevention Providers, taxes, and fees.

### Future Outlook

The LRE continues to engage and communicate with MDHHS to address any concerns MDHHS has regarding the region. Despite the openness in communication from the LRE and the support of MDHHS of the LRE's innovative plan to contract with Beacon Health Options, on April 25, 2019 MDHHS issued another notice of its intent to cancel the LRE's contract because it did not have a risk management strategy to cover all Medicaid and Healthy Michigan Plan services provided and, therefore is seen to be financially unstable. Unfortunately, the fiscal distress that LRE has experienced for the last few years (and those of several other PIHPs in Michigan) is the result of the systemic underfunding of the public behavioral health system. The LRE is continuing forward with month to month contracts with MDHHS. These settlement agreements were arranged at the invitation of MDHHS beginning in September 2019. There has been full participation of the LRE, Beacon Health Options, and CMHSP Leadership in these settlement meetings, and significant progress was made in addressing MDHHS concerns during the first quarter of FY2020. Addressing past deficits was part of the settlement discussion that was unresolved when meetings were deferred due to the COVID-19 pandemic. No additional settlement negotiation meetings are scheduled at this point; however, LRE expects that these will be rescheduled dependent on State COVID-19 response concerns.

The LRE along with many other public and private entities, stakeholders, providers, legislators, and advocates will

## **Lakeshore Regional Entity Management's Discussion and Analysis**

continue to be a voice for our consumers in support of funding to provide publicly mandated substance use and behavioral health services to those in need. The LRE Board promotes better health, better care, and better value, including funding equity across the region and state. The region is currently focused on responding to consumer need during Michigan's COVID-19 crisis.

For fiscal year 2020 the revenue allocation model for PIHPs was altered based on feedback from the PIHPs and CMHSPs. The changes in the methodology have significantly improved the financial status of the LRE for 2020, and current estimates show a projected surplus of over 6 million.

### **Contact Information**

As always, questions, comments, and suggestions are welcomed from interested parties and the general public. These can be directed to the Lakeshore Regional Entity, Finance Department, 5000 Hakes Dr. Suite 250, Norton Shores, MI 49441.

## BASIC FINANCIAL STATEMENTS



Lakeshore Regional Entity  
Statement of Net Position  
September 30, 2019

	Mental Health Operating	Medicaid Risk Reserve	Total Proprietary Funds
<b>Current assets</b>			
Cash and cash equivalents	\$ 14,057,568	\$ -	\$ 14,057,568
Accounts receivable	1,138,680	-	1,138,680
Due from affiliates	28,605,210	-	28,605,210
Due from MDHHS	8,910,068	-	8,910,068
Prepaid expenses	20,224	-	20,224
Total current assets	<u>52,731,749</u>	<u>-</u>	<u>52,731,749</u>
<b>Noncurrent assets</b>			
Capital assets - depreciable, net	<u>35,700</u>	<u>-</u>	<u>35,700</u>
Total assets	52,767,449	-	52,767,449
<b>Liabilities</b>			
Accounts payable	3,124,499	-	3,124,499
Accrued payroll and benefits	41,068	-	41,068
Due to affiliate	62,000,848	-	62,000,848
Due to MDHHS	3,807,977	-	3,807,977
Unearned revenue	8,500,970	-	8,500,970
Compensated absences	176,266	-	176,266
Total liabilities	<u>77,651,627</u>	<u>-</u>	<u>77,651,627</u>
<b>Net position</b>			
Net investment in capital assets	35,700	-	35,700
Unrestricted	<u>(24,919,878)</u>	<u>-</u>	<u>(24,919,878)</u>
Total net position	<u>\$ (24,884,178)</u>	<u>\$ -</u>	<u>\$ (24,884,178)</u>

Lakeshore Regional Entity  
Statement of Revenues, Expenses, and Changes in Net Position  
For the Year Ended September 30, 2019

	Mental Health Operating	Medicaid Risk Reserve	Total Proprietary Funds
<b>Operating revenues</b>			
State funding			
Medicaid	\$ 258,434,362	\$ -	\$ 258,434,362
Healthy Michigan	27,746,354	-	27,746,354
Incentive payments	3,010,495	-	3,010,495
Medicaid risk corridor - MDHHS	1,866,277	-	1,866,277
PA2 revenues	1,878,717	-	1,878,717
Substance use - State portion	1,889,875	-	1,889,875
Total State funding	294,826,081	-	294,826,081
Federal funding			
Substance use - Community grant	5,244,987	-	5,244,987
Substance use - Prevention	1,629,182	-	1,629,182
Substance use - Opioid Target Response	883,419	-	883,419
Substance use - State Opioid Response Grant	673,512	-	673,512
Substance use - Partnership for Success II	445,987	-	445,987
MI Youth Treatment Improvement & Enhancement	21,547	-	21,547
Block grants	180,119	-	180,119
Total Federal funding	9,078,753	-	9,078,753
Contributions - Local match drawdown	2,556,372	-	2,556,372
Total operating revenues	306,461,206	-	306,461,206
<b>Operating expenses</b>			
Funding for affiliate partners			
Autism Training	11,496	-	11,496
Medicaid	252,010,635	-	252,010,635
Healthy MI	33,166,468	-	33,166,468
SUD Block Grant	8,055,223	-	8,055,223
PA2 Liquor Tax	855,981	-	855,981
Total funding for affiliate partners	294,099,803	-	294,099,803
Other contractual obligations			
Contracted services - Prevention	3,697,855	-	3,697,855
Hospital Rate Adjuster	9,193,492	-	9,193,492
Local match expense	2,556,372	-	2,556,372
IPA assessment	3,650,157	-	3,650,157
Total other contractual obligations	19,097,876	-	19,097,876
Administrative expenses			
Board per diem	20,300	-	20,300
Capital outlay - under \$5,000	10,441	-	10,441
Depreciation expense	43,658	-	43,658
Dues and memberships	7,508	-	7,508
Insurance	20,112	-	20,112
Legal and accounting	230,461	-	230,461
Meeting expense	14,780	-	14,780
Professional contracts	7,523,109	-	7,523,109
Rent	45,730	-	45,730
Salaries and fringes	1,723,651	-	1,723,651
Supplies	16,232	-	16,232
Travel and training	56,838	-	56,838

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

Lakeshore Regional Entity  
Statement of Revenues, Expenses, and Changes in Net Position  
For the Year Ended September 30, 2019

	Mental Health Operating	Medicaid Risk Reserve	Total Proprietary Funds
Administrative expenses (continued)			
Utilities	\$ 39,444	\$ -	\$ 39,444
All other costs	20,814	-	20,814
Total administrative expense	<u>9,773,077</u>	<u>-</u>	<u>9,773,077</u>
Total operating expenses	<u>322,970,757</u>	<u>-</u>	<u>322,970,757</u>
Operating income (loss)	(16,509,551)	-	(16,509,551)
<b>Non-operating revenues (expenses)</b>			
Investment income	21,065	-	21,065
Total non-operating revenues (expenses)	<u>21,065</u>	<u>-</u>	<u>21,065</u>
<b>Change in net position</b>	<u>(16,488,486)</u>	<u>-</u>	<u>(16,488,486)</u>
<b>Net position, beginning of year</b>	(9,309,724)	-	(9,309,724)
<b>Prior period adjustment</b>	<u>914,032</u>	<u>-</u>	<u>914,032</u>
<b>Net position, end of year</b>	<u><u>\$ (24,884,178)</u></u>	<u><u>\$ -</u></u>	<u><u>\$ (24,884,178)</u></u>

Lakeshore Regional Entity  
Statement of Cash Flows  
For the Year Ended September 30, 2019

	Mental Health Operating	Medicaid Risk Reserve	Total Proprietary Funds
<b>Cash flows from operating activities</b>			
Receipts from the State and other governments	\$ 314,445,505	\$ 3,500,000	\$ 317,945,505
Payments to employees	(1,887,695)	-	(1,887,695)
Payments to affiliates and other governments	(313,197,679)	-	(313,197,679)
Payments to suppliers and providers	(6,709,658)	-	(6,709,658)
Net cash provided (used) by operating activities	<u>(7,349,527)</u>	<u>3,500,000</u>	<u>(3,849,527)</u>
<b>Cash flows from noncapital activities</b>			
Transfers from other funds	<u>3,500,000</u>	<u>(3,500,000)</u>	<u>-</u>
Net cash provided (used) by noncapital activities	<u>3,500,000</u>	<u>(3,500,000)</u>	<u>-</u>
<b>Cash flows from investment activities</b>			
Investment income	<u>21,065</u>	<u>-</u>	<u>21,065</u>
Net cash provided (used) by investment activities	<u>21,065</u>	<u>-</u>	<u>21,065</u>
<b>Net increase in cash and cash equivalents</b>	(3,828,462)	-	(3,828,462)
<b>Cash and cash equivalents, beginning of year</b>	<u>17,886,030</u>	<u>-</u>	<u>17,886,030</u>
<b>Cash and cash equivalents, end of year</b>	<u><u>\$ 14,057,568</u></u>	<u><u>\$ -</u></u>	<u><u>\$ 14,057,568</u></u>
Reconciliation of operating income to net cash provided by (used for) operating activities:			
Operating income (loss)	\$ (16,509,551)	\$ -	\$ (16,509,551)
Depreciation expense	43,658	-	43,658
Changes in assets and liabilities:			
Accounts receivable	254,836	-	254,836
Due from other governmental units	1,002,518	3,500,000	4,502,518
Prepaid expenses	28,186	-	28,186
Accounts payable	1,267,926	-	1,267,926
Accrued payroll and benefits	(57,735)	-	(57,735)
Due to other governmental units	5,730,404	-	5,730,404
Unearned revenue	996,540	-	996,540
Compensated absences	<u>(106,309)</u>	<u>-</u>	<u>(106,309)</u>
Net cash provided (used) by operating activities	<u><u>\$ (7,349,527)</u></u>	<u><u>\$ 3,500,000</u></u>	<u><u>\$ (3,849,527)</u></u>

**NOTES TO THE  
FINANCIAL STATEMENTS**





## **NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

The financial statements of Lakeshore Regional Entity (the Entity) have been prepared in conformity with U.S. generally accepted accounting principles (GAAP) as applicable to governmental units. The Governmental Accounting Standards Board (GASB) is the accepted standard-setting body for establishing governmental accounting and financial reporting principles. The following is a summary of the significant accounting policies used by the Entity.

### **Reporting Entity**

Lakeshore Regional Entity was formed by the Community Mental Health Service Programs (CMHSP) Participants to serve as the prepaid inpatient health plan ("PIHP") for the seven counties designated by the Michigan Department of Community Health as Region 3. The CMHSP Participants include Allegan County Community Mental Health, HealthWest (Formerly Muskegon County Community Mental Health), Network180, Ottawa Community Mental Health, and West Michigan Community Mental Health System.

Lakeshore Regional Entity is a regional entity, which was formed pursuant to 1974 P.A. 258, as amended, MCL §330.1204b, as a public governmental entity separate from the Entity Participants that established it.

### **Financial Statement Presentation**

Under GASB 34, the Entity is considered a special purpose government and has elected to present the basic statements as an Enterprise Fund (a type of proprietary fund) which is designed to be self-supporting. Enterprise Funds distinguish operating revenues and expenses from nonoperating items. The principal operating revenues of the Entity are charges related to serving its customers (including primarily "per member per month" capitation and state and county appropriations). Operating expenses for the Entity includes cost of services, administrative expenses, and depreciation on capital assets. All revenue and expenses not meeting this definition are reported as nonoperating revenues and expenses including investment income and interest expense.

As a general rule, the effect of interfund activity has been eliminated when presenting total proprietary fund activity.

All amounts shown are in U.S. dollars.

### **Fund Accounting**

The accounts of the Entity are organized on the basis of funds, each of which is considered a separate accounting entity. The operations of each fund are accounted for with a separate set of self-balancing accounts that comprise its assets, deferred outflows of resources, liabilities, deferred inflows of resources, net position, revenue, and expenses, as appropriate. Government resources are allocated to and accounted for in individual funds based upon the purposes for which they are to be spent and the means by which spending activities are controlled.

The Entity reports the following major enterprise fund:

*Mental Health Operating* – This fund is used to account for those activities that are financed and operated in a manner similar to private business relating to revenues earned, costs incurred, and/or net income. This fund of the Entity accounts for its general operations.

In addition, the Entity reports the following major internal service fund:

*Medicaid Risk Reserve* – This fund is used to cover the risk of overspending the Medicaid Managed Care Specialty Services Program Contract within the established risk corridor. This contract provides for the use of Michigan Department of Health and Human Services funding for the establishment of Internal Service Funds. Expenses from this fund will occur when, in any one fiscal year, the Entity finds it necessary to expend more to provide services to carry out the contract requirements than revenue provided by the contract.

### **Basis of Accounting and Measurement Focus**

Basis of accounting refers to when revenue and expenses are recognized in the accounts and reported in the financial statements. The proprietary funds are accounted for using the full accrual basis of accounting. Revenues are recognized when they are earned, and expenses are recognized when they are incurred. The proprietary funds are accounted for on a cost of services or economic resources measurement focus. This means that all assets and all liabilities associated with their activity are included on the statement of net position.

**Estimates**

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

**Cash and Cash Equivalents**

The Entity's cash and cash equivalents are considered to be cash on hand, money market funds, demand deposits, and certificates of deposit.

**Accounts Receivable/Payable**

Accounts receivable/payable in all funds report amounts that have arisen in the ordinary course of business. Accounts receivable is stated net of allowances for uncollectible amounts, if any.

**Due from/Due to Other Governmental Units**

Due from/due to other governmental units consist primarily of amounts due from/to the Entity Participants and the State of Michigan.

**Inventories**

The Entity does not recognize supplies inventory as an asset. The cost of these supplies is considered immaterial to the financial statements and the quantities are not prone to wide fluctuation from year to year. The costs of such supplies are expensed when purchased.

**Prepaid Expenses**

Certain payments to vendors reflect costs applicable to future accounting periods and are recorded as prepaid items in the financial statements. The cost of prepaid items is recorded as an expense when consumed rather than when purchased.

**Capital Assets**

Capital assets are defined by the Entity as individual assets with an initial cost equal to or more than \$5,000 and an estimated useful life in excess of one year. Such assets are recorded at historical cost or estimated historical cost if purchased or constructed. Donated capital assets are recorded at estimated acquisition value at the date of donation.

The costs of normal maintenance and repairs that do not add to the value of the asset or materially extend asset lives are not capitalized. Major outlays for capital assets and improvements are capitalized as projects are constructed.

Capital assets of the Entity are depreciated using the straight-line method over the following estimated useful lives:

<b>Assets</b>	<b>Years</b>
Leasehold Improvement	Remaining Lease Term
Computers and Software	3
Vehicles	4

The Entity reviews long-lived assets for impairment whenever events or changes in circumstances indicate that the carrying amount of an asset exceeds its fair value. If it is determined that an impairment loss has occurred, the asset is written down to its net realizable value and a related expense is recognized in the current year.

**Accrued Payroll and Benefits**

Accrued payroll and benefits relate to salaries and wages earned in September but not paid until October.

**Unearned Revenue**

The Entity reports unearned revenue when revenue does not meet either the "measurable" and "available" criteria for recognition in the current period, or when resources are received by the Entity before it has a legal claim to them, such as when grant money is received prior to the incurrence of qualifying expenses. In subsequent periods,

when both revenue recognition criteria are met, or when the Entity has legal claim to the resources, the liability for unearned revenue is removed and the revenue is recognized.

#### **Compensated Absences**

The Entity's policy permits employees to accumulate earned but unused vacation and sick benefits, which are eligible for payment upon separation from the Entity's service. The liability for such leave is reported as incurred in the financial statements. The liability for compensated absences includes salary related benefits, where applicable.

#### **Deferred Outflows/Inflows of Resources**

In addition to assets, the statement of net position will sometimes report a separate section for deferred outflows of resources. This separate financial statement element, deferred outflows of resources, represents a consumption of net position that applies to a future period(s) and so will not be recognized as an outflow of resources (expense) until then. The Entity has no items that qualify for reporting in this category.

In addition to liabilities, the statement of net position will sometimes report a separate section for deferred inflows of resources. This separate financial statement element, deferred inflows of resources, represents an acquisition of net position that applies to a future period(s) and so will not be recognized as an inflow of resources (revenue) until that time. The Entity has no items that qualify for reporting in this category.

#### **Net Position**

##### Net investment in capital assets

This category consists of capital asset balances, net of accumulated depreciation, less outstanding balances of debt related to those assets.

##### Restricted

Net position in this category is reported as restricted when constraints placed on net position use is either:

- Externally imposed by creditors, grantors, contributors, or laws or regulations of other governments, or
- Imposed by law through constitutional provisions or enabling legislation.

##### Unrestricted

If net position does not meet the criteria for the above categories, it is reported as unrestricted.

In addition, the Entity will first use restricted resources when an expense is incurred for purposes for which either restricted or unrestricted net position is available.

##### Restrictions on Net Position

##### **Internal Service Fund**

The Entity authorized the establishment of an internal service fund. This fund is used to cover the risk of overspending the Managed Care Specialty Services Program Contract within the established risk corridor. This contract provides for the use of Michigan Department of Health and Human Services (MDHHS) funding for the establishment of Internal Service Funds.

Expenses from this fund will occur when, in any one fiscal year, the Entity finds it necessary to expend more to provide services to carry out the contract requirements than revenue provided by the contract.

#### **MDHHS Revenue**

The Entity serves as the Pre-Paid Inpatient Health Plan for the area that includes Allegan, Kent, Lake, Mason, Muskegon, Oceana and Ottawa Counties. The Entity contracts directly with the MDHHS to administer mental health and substance abuse revenues for covered services provided to eligible residents of these counties.

## **NOTE 2 – CASH AND CASH EQUIVALENTS**

#### **Cash and Cash Equivalents**

Michigan's statutory authority allows governmental entities to invest in the following investments:

- Bonds, securities, other obligations and repurchase agreements of the United States, or an agency or instrumentality of the United States.
- Certificates of deposit, savings accounts, deposit accounts or depository receipts of a qualified institution.
- Commercial paper rated at the time of purchase within the 2 highest classifications established by not less than

Lakeshore Regional Entity  
Notes to the Financial Statements  
September 30, 2019

---

- 2 standard rating services and that matures not more than 270 days after the date of purchase.
- Bankers' acceptances of United States banks.
- Obligations of the State of Michigan and its political subdivisions that, at the time of purchase are rated as investment grade by at least one standard rating service.
- Mutual funds registered under the Investments Company Act of 1940 with the authority to purchase only investment vehicles that are legal for direct investment by a public corporation.
- External investment pools as authorized by Public Act 20 as amended through December 31, 1997.

At September 30<sup>th</sup> the carrying amount of the Entity's cash and cash equivalents are as follows:

Description	Amount
Checking, Money Market, & Liquid Asset Accounts	14,057,568

**Interest Rate Risk**

State law limits the allowable investments and the maturities of some of the allowable investments as identified in the summary of significant accounting policies. The Entity's investment policy does not have specific limits in excess of state law on investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates.

**Credit Risk**

State law limits investments to specific government securities, certificates of deposits and bank accounts with qualified financial institutions, commercial paper with specific maximum maturities and ratings when purchased, bankers acceptances of specific financial institutions, qualified mutual funds and qualified external investment pools as identified in the summary of significant accounting policies. The Entity's investment policy does not have specific limits in excess of state law on investment credit. The ratings for each investment are identified above for investments held at year-end.

**Custodial Credit Risk**

Custodial credit risk is the risk that in the event of a bank failure, the Entity's deposits may not be returned. State law does not require and the Entity does not have a policy for deposit custodial credit risk. As of year-end \$13,841,158 of the Entity's bank balance of \$14,091,158 was exposed to custodial credit risk because it was uninsured and uncollateralized. Deposits which exceed FDIC insurance coverage limits are held at local banks.

The Entity believes that due to the dollar amounts of cash deposits and the limits of FDIC insurance, it is impractical to insure all bank deposits. As a result, the Entity evaluates each financial institution with which it deposits funds and assesses the level of risk at each institution. Only those institutions with an acceptable estimated risk level are used as depositories.

**Concentration of Credit Risk**

State law limits allowable investments but does not limit concentration of credit risk as identified in the summary of significant accounting policies. The Entity's investment policy does not have specific limits in excess of state law on concentration of credit risk.

**NOTE 3 – ACCOUNTS RECEIVABLE**

The Entity believes that the accounts receivable will be collected in full and therefore the receivable balance has not been offset by an allowance for doubtful accounts.

**NOTE 4 - DUE FROM AFFILIATES**

Due from affiliates as of September 30<sup>th</sup> consists of the following:

Description	Amount
Allegan County Community Mental Health	3,100,786
HealthWest	4,919,868
Network180	14,330,600
Ottawa Community Mental Health	4,222,236
West Michigan Community Mental Health Systems	2,031,720
Total	28,605,210

**NOTE 5 - DUE FROM MDHHS**

Due from MDHHS as of September 30<sup>th</sup> consists of the following:

Description	Amount
Performance Bonus Incentive	1,910,636
FY18 MDHHS Risk Portion	1,360,996
FY19 MDHHS Risk Portion	1,866,277
Retro payments	1,576,118
Block grant	314,777
HRA	1,881,264
Total	8,910,068

**NOTE 6 - CAPITAL ASSETS**

A summary of changes in capital assets is as follows:

Description	Beginning Balance	Increases	Decreases	Ending Balance
Capital assets being depreciated				
Leasehold Improvement	9,500	-	-	9,500
Computers and software	159,525	-	-	159,525
Vehicles	31,485	-	-	31,485
Total capital assets being depreciated	200,510	-	-	200,510
Accumulated depreciation				
Leasehold Improvement	(9,500)	-	-	(9,500)
Computers and software	(80,167)	(43,658)	-	(123,825)
Vehicles	(31,485)	-	-	(31,485)
Total accumulated depreciation	(121,152)	-	-	(164,810)
Net capital assets being depreciated	79,358	(43,658)	-	35,700
Net capital assets	79,358	(43,658)	-	35,700

**NOTE 7 - DUE TO AFFILIATES**

Due to affiliates as of September 30<sup>th</sup> consists of the following:

Description	Amount
Allegan County Community Mental Health	714,480
HealthWest	20,244,280
Network180	32,270,958
Ottawa Community Mental Health	5,890,243
West Michigan Community Mental Health	2,150,935
Beacon Health Options	729,952
Total	62,000,848

**NOTE 8 - DUE TO MDHHS**

Due to MDHHS as of September 30<sup>th</sup> consists of the following:

Description	Amount
Taxes Payable	1,855,780
Block Grant	1,836,482
Other	115,715
Total	3,807,977

**NOTE 9 - UNEARNED REVENUE**

Unearned revenue as of September 30<sup>th</sup> consists of the following:

Description	Amount
PA2 Carryforward	8,472,684
Other unearned revenues	28,286
Total	8,500,970

**NOTE 10 - LONG-TERM LIABILITIES**

Changes in the long-term liabilities are as follows:

Description	Beginning Balance	Additions	Reductions	Ending Balance	Due within one year
Compensated absences	282,575	-	(106,309)	176,266	176,266

**NOTE 11 - NET INVESTMENT IN CAPITAL ASSETS**

Net investment in capital assets as of September 30<sup>th</sup> consists of the following:

Net investment in capital assets	Amount
Capital asset being depreciated, net	35,700

## **NOTE 12 – RETIREMENT AND OTHER POST EMPLOYMENT BENEFIT PLANS**

### **Defined Contribution Retirement Plan – 401(a)**

#### Plan Description

The Entity offers all employees a retirement plan created in accordance with the Internal Revenue Code, Section 401(a). The assets of the plan were held in trust for the exclusive benefit of the participants (employees) and their beneficiaries. ICMA acts as the custodian for the plan and holds the custodial account for the beneficiaries of this Section 401(a) plan.

The assets may not be diverted to any other use. The ICMA are agents of the employer for purposes of providing direction to the custodian of the custodial account from time to time for the investment of the funds held in the account, transfer of assets to or from the account and all other matters. Plan balances and activities are not reflected in the Entity's financial statements.

Plan provisions are established or amended by Board resolution. This plan is funded by both employer and employee contributions.

#### Eligibility

All full-time employees are eligible.

#### Contributions

*Contributions in lieu of Social Security:* The Entity contributes 5% of the employee's compensation in lieu of Social Security. Employees are required to contribute 6% of compensation.

*Contributions to retirement plan:* The Entity contributes 10% of the employee's compensation regardless of the employee contribution. If the employee irrevocably elects to contribute 2% of compensation, the Entity will match the employee's contribution with an additional 2%.

#### Normal Retirement Age & Vesting

Retirement age as defined by the plan is 62 years of age. Contributions are 100% vested after one year of employment.

#### Forfeitures

Forfeitures of employer contributions (due to the employee not having obtained one year of employment) are used to offset future employer contributions.

For the year ended September 30<sup>th</sup>, employer contributions (reduced by \$0 in forfeitures) amounted to \$227,592 and employee contributions amounts to \$106,075. The outstanding liability to the plan at year-end was \$2,998.

### **Deferred Compensation Retirement Plan – 457 (b)**

#### Plan Description

The Entity offers all employees a deferred compensation plan created in accordance with the Internal Revenue Code, Section 457. The assets of the plan were held in trust, as described in IRC Section 457 (b) for the exclusive benefit of the participants (employees) and their beneficiaries. ICMA acts as the custodian for the plan and holds the custodial account for the beneficiaries of this plan.

The assets may not be diverted to any other use. ICMA are agents of the employer for purposes of providing direction to the custodian of the custodial account from time to time for the investment of the funds held in the account, transfer of assets to or from the account and all other matters. Plan balances and activities are not reflected in the Entity's financial statements.

Plan provisions are established or amended by Board resolution. Under the plan, employees may elect to defer a portion of their wages, subject to Internal Revenue Service limits. This plan is funded solely by employee contributions.

#### Eligibility

All full-time employees are eligible.

Contributions

Pre-tax employee deferrals and catch up contributions are allowed (up to maximum allowed by law).

Normal Retirement Age & Vesting

Retirement age as defined by the plan is 62 years of age. All contributions are 100% vested immediately.

Forfeitures

Contributions are 100% vested immediately therefore there are no forfeitures.

Funding

For the year ended September 30<sup>th</sup>, contributions by employees amounted to \$17,058. The outstanding liability to the plan at year-end was \$518.

**Defined Contribution Retirement Plan – IRA**

Plan Description

The Entity offers all employees a retirement plan created pursuant with the Internal Revenue Code. The assets of the plan were held in trust for the exclusive benefit of the participants (employees) and their beneficiaries. ICMA acts as the custodian for the plan and holds the custodial account for the beneficiaries of this plan.

The assets may not be diverted to any other use. The Administrators are agents of the employer for purposes of providing direction to the custodian of the custodial account from time to time for the investment of the funds held in the account, transfer of assets to or from the account and all other matters. Plan balances and activities are not reflected in the Entity's financial statements.

Plan provisions are established or amended by Board resolution. This plan is funded solely by employee contributions.

Eligibility

All employees are eligible.

Contributions

Pre-tax employee deferrals and catch up contributions are allowed (up to maximum allowed by law).

Normal Retirement Age & Vesting

Normal retirement age as defined by the plan is 62 years of age. All contributions are 100% vested immediately.

Forfeitures

Contributions are 100% vested immediately therefore there are no forfeitures.

Funding

For the year ended September 30<sup>th</sup>, contributions by employees amounted to \$14,741. The outstanding liability to the plan at year-end was \$229.

**NOTE 13 - OPERATING LEASES**

The Entity has entered into various operating leases for the use of real and personal property. Operating leases do not give rise to property rights or lease obligations, and therefore, the results of the lease agreements are not reflected in the financial statements. Lease expense for the fiscal year was approximately \$41,201.

The future minimum lease obligations as of September 30<sup>th</sup>, were as follows:

Year Ending September 30 <sup>th</sup>	Amount
2020	41,403
2021	38,747
2022	7,957



#### **NOTE 14 - RISK MANAGEMENT**

##### MMRMA

The Entity is exposed to various risks of loss related to theft of, damage to, and destruction of assets; errors and omissions; injuries; and natural disasters. The Entity participated in the public entity risk pool – Michigan Municipal Risk Management Authority (MMRMA) for auto and general liability, property and crime and vehicle physical damage coverage.

MMRMA, a separate legal entity, is a self-insured association organized under the laws of the State of Michigan to provide self-insurance protection against loss and risk management services to various Michigan governmental entities.

As a member of this pool, the Entity is responsible for paying all losses, including damages, loss adjustment expenses and defense costs, for each occurrence that falls within the member's self-insured retention. If a covered loss exceeds the Entity's limits, all further payments for such loss are the sole obligation of the Entity. If for any reason MMRMA's resources available to pay losses are depleted, the payment of all unpaid losses of the Entity is the sole obligation of the Entity. Settled claims have not exceeded the amount of coverage in any of the past three years.

The Entity's coverage limits are \$10,000,000 for liability, \$1,500,000 for vehicle physical damage, and approximately \$1,051,421 for buildings and personal property.

##### Medicaid Risk Reserve

The Entity covers the costs up to 105% of the annual Medicaid and Healthy Michigan contract. The Entity and MDHHS equally share the costs between 105% to 110% of the contract amounts. Costs in excess of 110% of the contract are covered entirely by MDHHS.

The Entity has established a Medicaid Risk Reserve Fund, in accordance with Michigan Department of Health and Human Services guidelines, to assist in managing any potential operating shortfalls (as noted above) under the terms of its contract with the MDHHS.

#### **NOTE 15 – CONTINGENT LIABILITIES**

Under the terms of various federal and state grants and regulatory requirements, the Entity is subject to periodic audits of its agreements, as well as a cost settlement process under the full management contract with the State. Such audits could lead to questioned costs and/or requests for reimbursement to the grantor or regulatory agencies. Cost settlement adjustments, if any, as a result of compliance audits are recorded in the year that the settlement is finalized. The amount of expenses which may be disallowed, if any, cannot be determined at this time, although the Entity expects such amounts, if any, to be immaterial.

#### **NOTE 16 – ECONOMIC DEPENDENCE**

The Entity receives over 90% of its revenues from the State of Michigan directly from MDHHS.

#### **NOTE 17 – PRIOR PERIOD ADJUSTMENT**

The prior period adjustment in these financial statements consists of the following items:

Description	Amount
Additional revenues received from MDHHS for prior fiscal years	370,207
Reduction in use tax payable	543,825
Total	914,032

#### **NOTE 18 – GOING CONCERN**

As of the financial statement date, the Entity has a deficit net position of \$(24,884,178) in its Mental Health Operating Fund. The Entity liquidated the remaining funds in its Medicaid Risk Reserve (ISF) during FY18 and did not have any remaining reserves in the ISF fund to offset the FY19 Operating Fund deficit.

As of the date of the opinion, there is evidence to show that the Entity will be unable to continue to meet its obligations as they become due within 12 months from the financial statement date. The Entity has incurred substantial annual deficits in the last two fiscal years which raises substantial doubt about its ability to continue as a going concern. Furthermore, future projections available as of the date of the opinion show this deficit continuing to increase.

Mitigating factors that could play a role in the Entity's ability to continue as a going concern include 1) a favorable settlement to the contract dispute with MDHHS (see note 19) and 2) changes to the revenue allocation methodology as detailed in the following paragraph

For fiscal year 2020, the revenue allocation model for PIHPs is expected to be altered based on feedback from the PIHPs and CMHSPs. The proposed changes in the methodology could have a positive impact to the Entity's financial status going forward.

#### **NOTE 19 – SUBSEQUENT EVENTS**

In July 2019, MDHHS sent a formal notice to the Entity that MDHHS would be cancelling the Specialty Prepaid Inpatient Health Plan contract with the Entity effective September 30, 2019. In its formal notice, MDHHS stated that the Entity is in material default related to not having a viable risk management strategy in accordance with MDHHS standards. The Entity sent a response to MDHHS which disputed the cancellation of its PIHP contract, demanding for a retraction of the notice, and meeting with key stakeholders. MDHHS respond to the Entity which stated that MDHHS will not be retracting the notice of cancellation.

A hearing date with the Administrative Law Judge (ALJ) was scheduled for October 17, 2019 (subsequent to year end). However, MDHHS reached out to the Entity in September of 2019 with the intent of working out a settlement agreement that would address their concerns moving forward and allow continuation of the contract with the Entity. A deferral of the hearing with the ALJ was requested and received.

The first meeting occurred on September 23, 2019 with representatives from MDHHS, the Entity and its Board, and CMHSP Participants. Progress was made on terms of an agreement however several issues, including Board governance and past financial deficits, remain under negotiation with MDHHS going into fiscal year 2020. As of March 2020, these negotiation meetings were deferred due to the urgency of the COVID-19 pandemic. The hearing remains on deferral with updates to the ALJ every two months.

MDHHS is continuing to fund the Entity into fiscal year 2020 with month-to-month contracts. No additional settlement negotiation meetings are scheduled as of the date of the opinion. Management expects that these meetings will be rescheduled once the urgency of the COVID-19 pandemic has subsided.

#### **NOTE 20 – DEFICIT NET POSITION**

As of the financial statement date, the Entity is in a deficit net position. As outlined in Numbered Letter 2016-1 issued by the Department of Treasury, this deficit does not pass the 4 Step test for proprietary funds to determine if a deficit elimination plan is required. Therefore, the Entity is required to file a deficit elimination plan with the State.

#### **NOTE 21 - UPCOMING ACCOUNTING PRONOUNCEMENTS**

*GASB Statement No. 84, Fiduciary Activities*, was issued by the GASB in January 2017 and will be effective for the Entity's 2019-2020 fiscal year. The objective of this Statement is to improve guidance regarding the identification of fiduciary activities for accounting and financial reporting purposes and how those activities should be reported. This Statement establishes criteria for identifying fiduciary activities for all state and local governments. The focus on the criteria generally is on (1) whether a government is controlling the assets of the fiduciary activity and (2) the beneficiaries with whom a fiduciary relationship exists. An activity meeting the criteria should be reported in a

fiduciary fund in the basic financial statements. Entities with activities meeting the criteria should present a statement of fiduciary net position and a statement of changes in fiduciary net position.

*GASB Statement No. 87, Leases*, was issued by the GASB in June 2017 and will be effective for the Entity's 2020-2021 fiscal year. The objective of this Statement is to better meet the information needs of financial statement users by improving accounting and financial reporting for leases by governments. This Statement increases the usefulness of governments' financial statements by requiring recognition of certain lease assets and liabilities for leases that previously were classified as operating leases and recognized as inflows of resources or outflows of resources based on the payment provisions of the contract. It establishes a single model for lease accounting based on the foundational principle that leases are financings of the right to use an underlying asset. Under this Statement, a lessee is required to recognize a lease liability and an intangible right-to-use lease asset, and a lessor is required to recognize a lease receivable and a deferred inflow of resources, thereby enhancing the relevance and consistency of information about governments' leasing activities.



**Independent Auditor's 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**

To the Members of the Board  
Lakeshore Regional Entity  
Norton Shores, Michigan

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 business-type activities, each major fund, and the aggregate remaining fund information of Lakeshore Regional Entity (the Entity), as of and for the year ended September 30, 2019, and the related notes to the financial statements, which collectively comprise the Entity's basic financial statements, and have issued our report thereon dated May 28, 2020.

**Internal Control over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the Entity'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 opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Entity's internal control. Accordingly, we do not express an opinion on the effectiveness of the Entity'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 Entity'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 no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

**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.

Sincerely,

*Roslund, Prestage & Company, P.C.*

Roslund, Prestage & Company, P.C.  
May 28, 2020



**Lakeshore Regional Entity  
Financial Statements  
September 30, 2019**