

MAK 03 2025

FILED

# CERTIFICATION

March 3, 2025

I, Eric Dunning, Director of Insurance of the State of Nebraska, do hereby certify that the attached is a full and correct copy of the Financial Examination Report of

**NASB ALL LINES INTERLOCAL COOPERATIVE AGGREGATE POOL**

**AS OF**

**AUGUST 31, 2023**

The report is now on file and forming a part of the records of this Department.

I hereto subscribe my name under the seal of my office at Lincoln, Nebraska.



A handwritten signature in blue ink, appearing to read "Eric Dunning", is written over a horizontal line.

DIRECTOR OF INSURANCE

CERTIFICATE OF ADOPTION

Notice of the proposed report for the financial examination of

**NASB ALL LINES INTERLOCAL COOPERATIVE AGGREGATE POOL**

**1311 STOCKWELL STREET**

**LINCOLN, NE 68502**

dated as of August 31, 2023, verified under oath by the examiner-in-charge on  
February 6, 2025, and received by the company on February 7, 2025, has been adopted  
without modification as the final report pursuant to Neb. Rev. Stat. § 44-5906(3) (a).

Dated this 21<sup>st</sup> day of February 2025.

STATE OF NEBRASKA  
DEPARTMENT OF INSURANCE

A handwritten signature in black ink that reads "Tadd R. Wegner". The signature is written in a cursive style with a large, prominent initial 'T'.

Tadd Wegner, CFE  
Chief Financial Regulator

**STATE OF NEBRASKA**

**Department of Insurance**

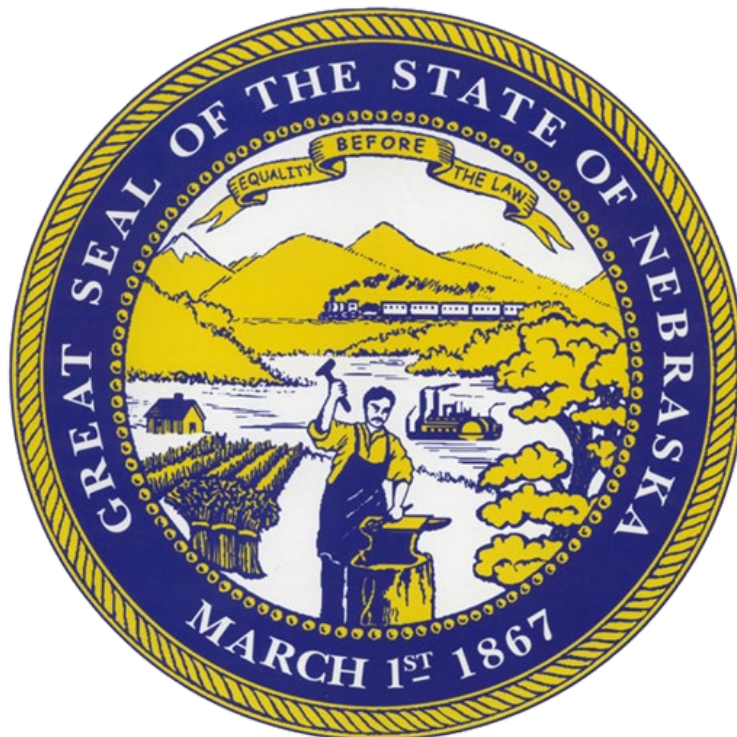
**EXAMINATION REPORT**

**OF**

**NASB ALL LINES INTERLOCAL COOPERATIVE AGGREGATE POOL**

**as of**

**August 31, 2023**



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Lincoln, Nebraska  
September 6, 2024

Honorable Eric Dunning  
Director of Insurance  
Nebraska Department of Insurance  
1526 K Street, Suite 200  
Lincoln, Nebraska 68508

Dear Sir:

Pursuant to your instruction and authorizations, and in accordance with statutory requirements, an examination has been conducted of the financial condition and business affairs of:

**NASB ALL LINES INTERLOCAL COOPERATIVE AGGREGATE POOL  
1311 Stockwell Street  
Lincoln, Nebraska 68502**

(hereinafter also referred to as the “Pool”) and the report of such examination is respectfully presented herein.

**INTRODUCTION**

The State of Nebraska last examined the Pool as of August 31, 2018. The current financial condition examination covers the intervening period to and includes the close of business on August 31, 2023 and such subsequent events and transactions as were considered pertinent to this report. The State of Nebraska participated in this examination and assisted in the preparation of this report.

**SCOPE OF EXAMINATION**

The Nebraska Department of Insurance conducted this examination pursuant to and in accordance with both the NAIC Financial Condition Examiners Handbook (Handbook) and Section §44-4310(2) of the Nebraska Insurance Statutes.

The Nebraska Department of Insurance made a general review of the Pool's operations and the manner in which its business has been conducted in order to determine compliance with statutory and charter provisions. The Pool's history was traced and has been set out in this report under the caption "Description of Pool." All items pertaining to management and control were reviewed, including provisions for disclosure of conflicts of interest to the Board of Trustees and the departmental organization of the Pool. The Articles of Incorporation and By-Laws were reviewed, including appropriate filings of any changes or amendments thereto. The minutes of the meetings of the Members, Board of Trustees and committees, held during the examination period were read and noted. Attendance at meetings, proxy information, election of Trustees and Officers, and approval of investment transactions were also noted.

The fidelity bond and other insurance coverages protecting the Pool's property and interests were reviewed. A Certificate of Authority to conduct the business of insurance in Nebraska was inspected and a survey was made of the Pool's general plan of operation.

Data reflecting the Pool's growth during the period under review is reflected in the financial section of this report under the caption "Body of Report."

The Pool's excess insurance facilities were ascertained and noted and have been commented upon in this report under the caption "Excess Insurance." Accounting records and procedures were tested to the extent deemed necessary through the examination process. The Pool's method of claims handling and procedures pertaining to the adjustment and payment of incurred losses were also noted.

All accounts and activities of the Pool were considered in accordance with the provisions of Section §44-4310(2) of the Nebraska Insurance Statutes. This included a review of workpapers prepared by Thomas, Kunc and Black, LLP, the Pool's external auditors, during their audit of the

Pool's accounts for the examination period. Portions of the auditor's workpapers have been incorporated into the workpapers of the examiners and have been utilized in determining the scope and areas of emphasis in conducting the examination. This utilization was performed pursuant to Title 210 (Rules of the Nebraska Department of Insurance), Chapter 56, Section 013.

Any failure of items to add to the totals shown in schedules and exhibits appearing throughout this report is due to rounding.

## **DESCRIPTION OF POOL**

### **HISTORY**

The Pool was organized under the laws of the State of Nebraska on June 16, 1990, pursuant to the Intergovernmental Risk Management Act, Section §44-4301 to §44-4339 of the Nebraska Insurance Statutes. The Pool was formed to provide workers' compensation coverage to members of the Nebraska Association of School Boards (NASB). On August 22, 1990, the Pool was granted a Certificate of Authority and it commenced business as of that date.

On September 1, 1996, the name of the Pool was changed to NASB All Lines Interlocal Cooperative Aggregate Pool and began offering multi-peril coverage to its members.

Pursuant to a change in the Intergovernmental Risk Management Act, Section §44-4301(1) of the Nebraska Insurance Statutes, during the 1997 legislative session, the Pool applied for and received approval from the Nebraska Director of Insurance to file its financial statements corresponding to its fiscal year of September 1 to August 31. This change began with the August 31, 1997 Annual Statement.

## **MANAGEMENT AND CONTROL**

### **Membership**

Article 3.5 of the Pool's Participation Agreement states that, "Members and/or school districts shall mean (a) those public school districts defined in §79-101, (b) those educational service units established under §79-2201, and (c) those technical community college established under §79-2636, the governing boards of which are Members of NASB which have passed resolutions pursuant to law entering into this agreement."

Article 7.3 of the Pool's Participation Agreement states that, "a Member may withdraw from participation in the pool at any time after the initial thirty-six (36) months, by giving written notice of termination to the Pool, the other Members in the Pool, and the Director of Insurance at least ninety (90) days prior to such anniversary date. Such termination shall not be effective until approved by the Director as provided by Neb. Rev. Stat. Sec. 44-4309(1)." Article 7.4 further states that, "after a Member ceases to participate in the Pool, the former Member shall remain liable for any costs and obligations incurred by the Pool while the Member was a participant, and any contractual obligation the Member entered into with the Pool on or before the date of termination, as provided by §44-4309(3)."

### **Board of Trustees**

Article 9.1 of the Pool's Participation Agreement states that, "the Pool shall be operated by a Board of Trustees consisting of two ex officio Members and nine (9) persons, who are elected officials or appointed officials of school districts, which are signatories hereto. The two ex officio Members of the Board of Trustees shall be the President and the Executive Director of NASB. The other nine Members shall be elected by a vote of the Board of Directors of NASB. A vacancy on the Board shall be filled by a vote of the Board of Directors of NASB. The person



appointed to fill a vacancy shall serve for the remainder of the term of the vacating trustee. All Board members whether ex officio elected or appointed shall be entitled to one vote each in all matters that come before the Board.”

The following persons were serving as Trustees on August 31, 2023:

<b><u>Name</u></b>	<b><u>Educational Affiliation</u></b>	<b><u>Term Expires</u></b>
Rhonda Burbach	School Board Member Norris School District	12/31/2024
Virgil Harden	Business Manager Grand Island Public Schools	12/31/2024
Sandy Noffsinger	School Board Member Stratton School Districts	12/31/2024
Nicole Regan	Superintendent Gering Public Schools	12/31/2024
Chip Kay	Superintendent Columbus Public Schools	12/31/2025
Jeff Rippe	Superintendent Bellevue Public Schools	12/31/2025
Amy Sines	Board Member Cambridge Public Schools	12/31/2025
Ted DeTurk	Administrator ESU #2	12/31/2026
Tom Menke	School Board Member Chadron Public Schools	12/31/2026

Ex-officio Board Members:

Steve Koch – President, NASB

John Spatz – Executive Director, NASB

### **Officers**

Article V of the Pool’s By-Laws states that, “the Board at its first meeting each year shall choose from among the elected Trustees a Chairperson and Vice Chairperson. The Board may

appoint such other Officers and agents as it shall deem necessary who shall hold office for such terms and shall exercise such powers and perform such duties as shall be determined from time to time by the Board.”

The following is a listing of Officers elected and serving the Pool on August 31, 2023:

<b><u>Name</u></b>	<b><u>Office</u></b>
Steve Koch	President
Ted DeTurk	Vice President
John Spatz	Treasurer
Megan Boldt	Secretary – Administrative
Rachel Horstman	Secretary – Financial

### **Committees**

Article III, Section 1 of the By-Laws states that, “the Board may, by resolution passed by a majority of the whole Board, designate one or more committees. Each such committee shall consist of two or more Directors and to the extent provided by the Board and subject to the agreement and applicable law, shall have and may exercise the powers of the Board in the management of the business and affairs of the Pool.”

The following persons were serving on the Finance and Audit Committee on August 31, 2023:

Ted DeTurk	Troy Loeffelholz	Bill Knapper
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The following persons were serving on the Underwriting and Marketing Committee on August 31, 2023:

Ken Schroeder	Steve Koch	Sandy Noffsinger
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The following persons were serving on the Claims Committee on August 31, 2023:

Rhonda Burbach	Jeff Rippe	John Spatz
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The following persons were serving on the Loss Control Committee on August 31, 2023:

Tom Menke

Amy Sines

## **SERVICE AGREEMENTS**

### **Administration Agreement**

Effective September 1, 2004, the Pool entered into an agreement with Public Risk Management, Inc. (PRM), under which PRM agrees to promote the Pool including the solicitation of other potential school district participants and to serve as an information resource to the Pool. PRM shall maintain the appropriate records and procedures necessary to comply with the rules, regulations and other requirements of the Department and to submit to NASB all Pool experience rating data. PRM shall provide a resident agent in the State of Nebraska, issue all coverage documents and certificates and procure on behalf to the Pool, and at the Pool's expense, insurance and reinsurance coverage for the protection of the Pool. PRM shall maintain the books and records of all moneys which PRM handles for the Pool in a manner consistent with generally accepted accounting principles and consistent with statutory insurance accounting principles. PRM shall also provide actuarial support services to the Pool and assist the Pool in determining necessary contributions.

For the services performed under this agreement, the Pool shall pay PRM a fee as approved by the Board of Trustees in its annual budget. Such fee is to be paid in four quarterly payments beginning September 1 of each year.

### **Claims Management Agreement**

The Pool has a service agreement for administration of a claims program with Sedgwick Claims Management Services, Inc. (SCMS), effective September 1, 2014. The agreement has a term of three years and successive addendums are submitted to extend the agreement for an

additional three years. The agreement is currently extended through 2026. SCMS has provided similar services to the Pool since its inception. Under this agreement, SCMS shall review all claims and loss reports received by the Pool and process all qualified claims; conduct claim investigations and arrange for independent investigators, appraisers, or medical or other experts, to the extent deemed necessary; pay benefits, expenses, and adjust or settle claims at its discretion up to \$10,000, or as specifically approved by the Pool; maintain a file for each claim; notify excess or umbrella insurers of each qualified claim with values that exceed the Pool's retention; assist the Pool's counsel in preparing for defense of litigated cases; maintain a current estimate of the expected total cost of each claim based on known facts; furnish the Pool with computer reports of selected loss information; and report federal, state, and local 1099 information for vendor payments made by SCMS.

SCMS provides managed care services on workers' compensation claims, special investigative unit services, and Medicare reporting and compliance services. SCMS may subcontract to affiliated corporations various services to be provided under this agreement. The Pool shall pay SCMS a flat service fee negotiated annually and specified by addendum to the agreement. This fee was \$587,823 for the 2023 fiscal year.

#### **Management Agreement**

Each member of the Pool is also a member of NASB. The Pool has entered into a management agreement with NASB under which NASB provides certain management services for the Pool, effective September 1, 2011. The agreement states that NASB shall maintain the appropriate records and procedures to comply with the rules, regulations and other requirements of the Department, including the preparation and filing of all records, statistics, forms or other materials or information required by the Department, and the filing of all premium tax returns and

the payment of all premium taxes for the Pool. NASB shall be responsible for the approval and payment of all reasonable expenses. Additionally, this agreement provides, in part, that NASB shall provide to the Pool monthly accounting of all income and expenses as directed and/or incurred by the Pool; preparation and delivery all Member contribution statements; conduct all banking activities of the Pool, including receipt, deposit and disbursement of moneys of the Pool; make investments of the funds of the Pool in accordance with the policies established by the Board of Trustees of the Pool; maintain books and records in a manner consistent with generally accepted accounting principles, and consistent with all statutory insurance accounting principles; retain the services of independent auditors for all of the Pool's books and for the preparation of all necessary reports, including quarterly reports, and all financial statements required by law.

The agreement states that, "the parties shall adopt a working budget on a regular basis in accordance with the customary practices and policies of the parties, and shall determine in such budget the anticipated costs and expense of the operation of the Pool; all such estimates shall provide the initial basis for the payments of costs and expenses to be made by the Pool to NASB." Such amounts are subject to review and adjustment at any time, so that in no event shall NASB fail to recover the actual costs and expenses expended for the benefit of the Pool.

### **Loss Control Agreements**

The Pool has contracts with six consultants to develop and implement a loss control program for members of the Pool. The contracts are updated each year on September 1. The focus of the program is to reduce the risk of injuries, accidents, and liability claims for employees and others who enter school property. Duties of the consultants include meeting with superintendents and other appropriate personnel to develop a network of on-site risk managers,

provide guidance to increase safety awareness and the activation of safety programs. Reports to the Pool are also required for the development of a safety database.

## **TERRITORY AND PLAN OF OPERATION**

As evidenced by current or continuous Certificates of Authority, the Pool is licensed to transact business as a risk management pool in the State of Nebraska only.

The Pool operates to provide risk-management services and cost-effective insurance coverage for property, general liability, automobile, crime, dishonesty, school board liability, and workers' compensation coverage to public school districts, educational service units, and technical community colleges, the governing Boards of which are members of NASB. Membership totaled 189 school districts and educational service units as of August 31, 2023.

## **EXCESS INSURANCE**

The Pool has excess insurance policies providing coverage as follows:

### **Specific Excess Property and Liability**

#### **Ambridge Partners, LLC**

<b><u>Coverage</u></b>	<b><u>Limits</u></b>
Property:	
Real and personal property, per occurrence	\$ 750,000
Self-insured retention, each occurrence	250,000
General Liability:	
Each occurrence	\$ 5,000,000
General annual aggregate per member	10,000,000
Pool aggregate	30,000,000
Medical payments:	
Each person	5,000
Each occurrence	50,000
Fire damage liability	100,000
Auto Liability:	
Each accident	\$ 4,750,000
Sublimit:	

Medical: each person	5,000
each occurrence	50,000
Nebraska uninsured and underinsured motorists, each accident	50,000
Self-insured retention, each accident	250,000
Educators' Legal Liability:	
Each claim	\$ 4,750,000
Annual aggregate per member	10,000,000
Annual aggregate for the pool	30,000,000
Self-insured retention, each claim	250,000
Workers' Compensation & Employers' Liability:	
Employers' liability each accident	\$ 850,000
Self-insured retention each accident	250,000
Crime:	
Money & securities	\$ 975,000
Forgery or alteration	975,000
Employee dishonesty	975,000
Self-insured retention, each loss	25,000
Campus Security Activities Liability:	
Each occurrence	\$ 5,000,000
Annual aggregate per named member	10,000,000

In the event of clash claims, the limit is the total of all excess limits of insurance coverages combined plus the difference between the sum of all the self-insured retentions applicable to each section of coverage and the smallest self-insured retention applicable to any section of coverage.

### **Excess Property**

	<u>\$100 Million Layer</u>	
Starr Surplus Lines		30% up to \$100 Million
Lloyds WRB		38.5% up to \$25 Million
Fidelis		5% up to \$25 Million
Lloyds KLN		26.5% up to \$10 Million
Lloyds CHN	21.5% of \$15 Million in Excess of \$10 Million	
Lloyds CIN	5% of \$15 Million in Excess of \$10 Million	
Lloyds LIB	12.95% of \$25 Million in Excess of \$25 Million	
Arch	10% of \$25 Million in Excess of \$25 Million	
Hallmark	14% of \$25 Million in Excess of \$25 Million	
Fidelis	20% of \$75 Million in Excess of \$25 Million	
Lloyds AUW	13.05% of \$75 Million in Excess of \$25 Million	
Great American	28.95% of \$50 Million in Excess of \$50 Million	
Swiss Re	8% of \$50 Million in Excess of \$50 Million	

Great American	<u>\$150 Million Layer</u> 100% of \$50 Million in Excess of \$100 Million
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Chubb Bermuda	<u>\$400 Million Layer</u> 100% of \$250 Million in Excess of \$150 Million
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<u>Coverage</u>	<u>Limits</u>
Liability each occurrence excess of \$1,000,000 retention	\$400,000,000
Sublimit – each occurrence:	
Miscellaneous unnamed locations	5,000,000
Newly acquired, vacant buildings	10,000,000
Course of construction	25,000,000
Debris removal	50,000,000
Earth movement - aggregate	50,000,000
Flood - aggregate	50,000,000
Flood – 100 year - aggregate	15,000,000

### **Excess Terrorism**

#### Lloyds Convex

Limits of Recovery:	100% up to \$50 Million 100% of \$350 Million in excess of \$50 Million
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### **Excess Cyber Buy Back**

#### Lloyds Convex

Limits of Recovery:	70% up to \$25 Million 70% of \$25 Million in excess of \$25 Million 40% of \$50 Million in excess of \$50 Million
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### **Excess Workers' Compensation**

#### Safety National Casualty Corporation

Retention, per occurrence	\$ 850,000
Workers' compensation:	Statutory
Employer's liability:	\$ 3,250,000



### **Equipment Breakdown**

#### **Travelers BoilerRe**

Equipment breakdown limit	\$150,000,000
Off premises property damage	100,000
Servicer interruption	5,000,000
Perishable goods	250,000
Data restoration	250,000
Demolition	5,000,000
Ordinance or law	5,000,000
Expediting expense	250,000
Hazardous substance	250,000
Newly acquired locations	10,000,000
Builders risk – new construction	10,000,000

### **Cyber Liability**

#### **Beazley Group**

Pool Annual Aggregate – All Coverages Combined	\$2,500,000
Annual Aggregate per Qualified Member	\$ 250,000
Breach Response Costs	
Business Interruption Loss	
Resulting from Security Breach	\$ 250,000
Resulting from System Failure	250,000
Dependent Business Loss	
Resulting from Dependent Security Breach	250,000
Resulting from Dependent System Failure	250,000
Cyber extortion loss	250,000
Data recovery costs	250,000
Data and network liability	250,000
Regulatory defense and penalties	250,000
Payment card liabilities and costs	250,000
Media liability	250,000
Fraudulent instruction	50,000
Funds transfer fraud	50,000
Telephone fraud	50,000
Criminal reward	10,000
Retentions	
Band 1 – Less than or Equal to \$50 Million expenditures	\$ 25,000
Band 2 – Greater than \$50M and Less than or equal to \$100M Expenditures	50,000
Band 3 – Greater than \$100M expenditures	100,000

**Terrorism****Ambridge Group, LLC**

Liability terrorism – broad form	\$4,750,000
Employers liability terrorism	600,000

**Pollution Liability****Ironshore Specialty Insurance Company**

Policy aggregate limit	\$5,000,000
Third party claims for BI, PD, and remediation expense, per incident	1,000,000
First party remediation expenses, per incident	1,000,000
Emergency response remediation expenses	1,000,000

**General**

All contracts reviewed contained standard insolvency, arbitration, errors and omissions, and termination clauses where applicable.

## **BODY OF REPORT**

### **GROWTH**

The following comparative data reflects the growth of the Pool during the period covered by this examination:

	<b><u>2019</u></b>	<b><u>2020</u></b>	<b><u>2021</u></b>	<b><u>2022</u></b>	<b><u>2023</u></b>
Cash on deposit	\$ 4,891,595	\$ 7,948,416	\$ 1,696,884	\$25,157,330	\$22,395,429
Short-term investments	14,741,679	13,311,763	33,696,209	8,770,225	12,311,368
Long-term investments	11,471,059	12,003,714		1,000,000	2,000,000
Total assets	32,679,741	34,558,949	36,881,590	35,623,058	38,628,070
Loss reserves	12,922,398	10,155,009	13,377,369	14,911,453	14,071,405
Unearned premiums	5,410,191	8,517,101	8,177,807	8,791,732	10,856,653
Total liabilities	22,010,770	21,785,123	25,206,668	27,736,978	26,945,750
Surplus	10,668,971	12,773,826	11,674,922	7,886,080	11,682,320
Premiums earned	20,001,485	20,897,587	24,396,631	26,705,309	31,302,005
Net investment income	568,140	456,674	68,471	92,157	981,960
Losses incurred	13,406,709	10,729,640	9,914,568	18,861,739	16,918,922
Net income	23,960	4,504,855	1,651,096	(489,279)	5,001,975

### **FINANCIAL STATEMENTS**

The following statement of admitted assets and liabilities, together with the accompanying summary of operations, reflects the financial condition of the Pool on August 31, 2023 and its transactions during the year 2023 as determined through this examination. A reconciliation of the capital and surplus account for the period under review is also included.

**FINANCIAL STATEMENT**  
**August 31, 2023**

**Assets**

Cash on deposit	\$ 22,395,429
Short-term investments	12,311,368
Long-term investments	<u>2,000,000</u>
Subtotal, cash and invested assets	\$ 36,706,797
Accounts receivable – reinsurance recoverable	<u>1,921,273</u>
Total assets	<u>\$ 38,628,070</u>

**Liabilities and Surplus**

Accounts payable	\$ 44,204
Loss reserves	14,071,405
Loss adjustment expenses payable	1,767,888
Unearned premium	10,856,653
Other accrued liabilities	<u>205,600</u>
Total liabilities	\$ 26,945,750
Surplus	<u>11,682,320</u>
Total liabilities and surplus	<u>\$ 38,628,070</u>

## **STATEMENT OF REVENUE AND EXPENSES – 2023**

### **Revenues**

Premiums earned, direct	\$ 31,302,005
Premiums earned, ceded	<u>(12,876,030)</u>
Net premiums	\$ 18,425,975
Investment income earned	981,960
Other income	<u>18</u>
Total revenues	<u>\$ 19,407,953</u>

### **Expenses**

Losses incurred, direct	\$ 16,918,922
Losses incurred, subrogation and salvage	(273,319)
Losses incurred, excess insurance recovery	<u>(5,602,754)</u>
Net losses	\$ 11,042,849
Loss expenses incurred	1,554,623
Other underwriting expenses incurred	<u>1,808,506</u>
Total expenses	<u>\$ 14,405,978</u>
Net income	<u>\$ 5,001,975</u>

## **CAPITAL AND SURPLUS ACCOUNT**

	<b><u>2019</u></b>	<b><u>2020</u></b>	<b><u>2021</u></b>	<b><u>2022</u></b>	<b><u>2023</u></b>
Surplus, beginning	<u>\$12,795,011</u>	<u>\$10,668,971</u>	<u>\$12,773,826</u>	<u>\$11,674,922</u>	<u>\$ 7,886,080</u>
Net income	\$ 23,960	\$ 4,504,855	\$ 1,651,096	\$ (489,279)	\$ 5,001,975
Change in nonadmitted assets				(699,563)	294,265
Retrospective premium	<u>(2,150,000)</u>	<u>(2,400,000)</u>	<u>(2,750,000)</u>	<u>(2,600,000)</u>	<u>(1,500,000)</u>
Surplus, ending	<u>\$10,668,971</u>	<u>\$12,773,826</u>	<u>\$11,674,922</u>	<u>\$ 7,886,080</u>	<u>\$11,682,320</u>

## **EXAMINATION CHANGES IN FINANCIAL STATEMENTS**

Unassigned funds (surplus) in the amount of \$11,682,320 as reported in the Pool's 2023 Annual Statement, has been accepted for examination purposes. Examination findings, in the aggregate, were considered to have no material effect on the Pool's financial condition.

## **COMPLIANCE WITH PREVIOUS RECOMMENDATIONS**

The recommendations appearing in the previous report of examination are reflected below together with the remedial actions taken by the Pool to comply therewith:

**Accounts Receivable - Premium** – It is recommended that the Pool create a journal entry to properly report the account receivable as \$0.

**Actions:** The Company has complied with this recommendation.

**Nominating Committee** – It is recommended that the Pool either construct the Nominating Committee in accordance with the Participation Agreement, or amend its Participation Agreement to reflect the Nominating Committee as it currently stands.

**Actions:** The Company has complied with this recommendation.

**Schedule P Reporting** – It is recommended that the Pool report the paid ULAE history on Schedule P in compliance with the suggestions made by the Department's Actuarial Specialist.

**Actions:** The Company has complied with this recommendation.

**Statement of Actuarial Opinion and Actuarial Report** – It is recommended that the Appointed Actuary included commentary in the Statement of Actuarial Opinion and/or the actuarial report in compliance with the suggestions made by the Department's Actuarial Specialist.

**Actions:** The Company has complied with this recommendation.

## **COMMENTARY ON CURRENT EXAMINATION FINDINGS**

There are no comments or recommendations that have been made as a result of this examination.

### **SUMMARY OF COMMENTS AND RECOMMENDATIONS**

There are no comments or recommendations that have been made as a result of this examination.

## **ACKNOWLEDGMENT**

The courteous cooperation extended by the Officers and employees of the Pool during this examination is hereby acknowledged.

In addition to the undersigned, Michael Sullivan, CFE, Financial Examiner; and Gary Evans, CISA, AES, CFE, Information Systems Specialist; all with the Nebraska Department of Insurance, participated in this examination and assisted in the preparation of this report.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. Davis', is positioned above a horizontal line.

---

Brian Davis, CFE  
Examiner-in Charge  
Department of Insurance  
State of Nebraska



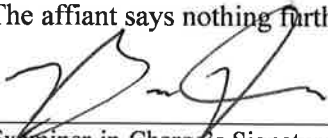
State of Nebraska,

County of Lancaster,

Brian Davis, being duly sworn, states as follows:

1. I have authority to represent the Department of Insurance of the State of Nebraska in the examination of NASB All Lines Interlocal Cooperative Aggregare Pool.
2. The Department of Insurance of the State of Nebraska is accredited under the National Association of Insurance Commissioners Financial Regulation Standards and Accreditation.
3. I have reviewed the examination work papers and examination report, and the examination of NASB All Lines Interlocal Cooperative Aggregare Pool was performed in a manner consistent with the standards and procedures required by the Department of Insurance of the State of Nebraska.

The affiant says nothing further.

  
Examiner-in-Charge's Signature

Subscribed and sworn before me by \_\_\_\_\_ on this 6<sup>th</sup> day of February, 20 25.



(SEAL)

  
Notary Public

My commission expires 1/16/28 [date].