

Summary of Financial Statement Audit Management Letter Comments  
Current Year Report  
As of June 30, 2018

## **Audit Management Letter Comments for the Year Ended 06/30/17**

### **Observation #1: Service Organization Control (SOC) Reports**

#### **Division responsible: Financial Office**

CalPERS engages service organizations to process and account for transactions that are significant to the administration and financial reporting of CalPERS investment, pension, health and long-term care activities. Statements on Standards for Attestation Engagements (SSAE) No. 16, Reporting on Controls at a Service Organization, and AICPA AT-C Section 320, Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control over Financial Reporting, which is effective for reports dated on or after May 1, 2017, provide guidance regarding examinations and related reports on controls at service organizations. One of the most effective ways a service organization can communicate information about the service organization and its control environment is through a Service Organization Control 1 (SOC 1) report. SOC 1 Type 2 report focuses on controls at the service organization that would be useful to user entities' internal control over financial reporting and includes an examination report on management's description of the suitability of the design and the operating effectiveness of the controls. CalPERS, as a user entity, requests SOC 1 Type 2 reports from certain third-party service organizations on an annual basis. However, CalPERS does not have processes or procedures in place related to the following:

- Identification of all third-party service providers that have a direct impact on CalPERS' accounting and financial reporting,
- Tracking of timely receipt and review of SOC 1 Type 2 reports,
- Review and evaluation of SOC 1 Type 2 reports to determine whether findings noted could have a direct impact on CalPERS' financial reporting, and
- Determination of whether CalPERS has the required complimentary user entity controls in place and whether those controls are operating effectively.

CalPERS should implement formal procedures related to the identification, receipt, and review of SOC 1 Type 2 reports for third-party service organizations that have a direct impact on CalPERS' financial statements. In addition, the Financial Office should review each SOC 1 Type 2 report along with the provisions of AT-C 320 to understand the scope and objectives of SOC 1 Type 2 engagements and to evaluate whether CalPERS' user entity controls are sufficient to compliment service organization controls.

**Financial Office's Current Update:** OPEN. Financial Reporting Accounting Services (FRAS) has received all SOC reports from program areas for relevant vendors and has began the process of tracking and reviewing deviations, determining whether any have a direct impact on financial reporting. Complementary user controls for each vendor are also noted and will be confirmed by relevant users. FRAS is currently awaiting responses for confirmation from all users that complementary user controls are in place. Project is going as planned and process will be implemented by July 31, 2018.

## **Observation #2: Accounting and Reporting for OPEB Contributions and Reimbursements Outside of the California Employers' Retiree Benefit Trust Fund (CERBTF)**

**Division responsible: Financial Office**

Governmental Accounting Standards Board (GASB) Statement No. 74, Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans, requires an Other Postemployment Benefits (OPEB) plan to report on all activities of the OPEB plan, and not solely the activities of the trust through which the OPEB plan is administered. Further, GASB Statement No. 74 requires that contributions from employers include amounts for OPEB as the benefits come due, including amounts that will not be reimbursed to the employers using OPEB plan assets. In addition, benefit payments should include benefit amounts paid directly by employers. In this circumstance, an amount equal to the benefit payments is recognized both as an addition to and a deduction from OPEB plan fiduciary net position. The System records this type of activity as Employer Contributions Outside of Trust – OPEB and OPEB Reimbursements – Outside Trust in the CERBTF statement of changes in fiduciary net position. In order to quantify benefits paid by employers outside of the trust, CERBTF Program personnel obtain this information from participating employers as part of year-end closing procedures. Contributions and reimbursements made outside of the trust are calculated as the sum of retiree healthcare premiums and implicit rate subsidies, net of any reimbursements made directly from the trust. As part of our testing, we noted the following errors, which resulted in audit adjustments:

- For 15 employers, there were errors in the implicit rate subsidy used in the calculations.
- For 10 employers, late and/or revised information submitted by the employers was not sufficiently reviewed for accuracy prior to making changes to the employers' original calculations.
- For three employers, calculations related to reimbursement amounts contained arithmetic errors.
- For two employers, the implicit rate subsidy was accounted for twice in the calculation.
- For two employers, the implicit rate subsidy used in the calculation pertained to an incorrect period.
- For one employer, CalPERS remitted an OPEB reimbursement that exceeded the employer's retiree healthcare premiums.

CERBTF Program personnel working in conjunction with the Financial Office should strengthen the current procedures to ensure the completeness and accuracy of information submitted by employers. Since the accounting and financial reporting for contributions and OPEB reimbursements outside of the trust is dependent on the completeness and accuracy of information submitted by the participating employers, management should consider providing additional guidance and tools to employers to assist in the preparation of financial information required by CalPERS.

**Financial Office's Current Update:** RESOLVED. Pending review by financial statement auditor. CERBT delivered 4 Webinars in May 2018, with approximately 300 contracted employers in attendance. The Webinars were successful for the first year. CERBT revised the Fiscal Year End (FYE) Data Reporting Form to minimize/simplify the data required to be submitted by the employers to CERBT. Communication was sent to all contracted Employers in May and June regarding the renewal valuation package submission and FYE Data Reporting Form. CERBT has implemented a peer review process for all data entry of the OPEB Valuation

documents to improve data accuracy. We have implemented our plan to address the issue and we consider this item closed.

### **Observation #3: Accounting and Reporting for the Replacement Benefit Fund (RBF)**

#### **Division responsible: Financial Office**

CalPERS elected to early adopt the provisions of GASB Statement No. 84, Fiduciary Activities, effective July 1, 2016. GASB Statement No. 84 eliminates the agency fund type and creates a new fund type called a custodial fund. As a result of the implementation, the RBF is now classified as a custodial fund and is required to present a statement of changes in fiduciary net position. During the audit, we noted the following items:

- The trial balance and reconciliations for the material RBF financial statement line items were not available for audit until mid-October.
- The original draft RBF financial statements contained misclassifications, which resulted in audit adjustments.
- Differences related to unearned replacement benefits recorded in the general ledger and my|CalPERS have not been corrected.

Although the Financial Office has improved reconciliation procedures, additional procedures are necessary to ensure RBF balances are complete and accurate.

The Financial Office should continue to work with the appropriate CalPERS Division to reconcile account balances in the RBF and to ensure accuracy and consistency between the general ledger and my|CalPERS. In addition, the information for the RBF should be made available by early September to allow sufficient time for auditing procedures.

**Financial Office's Current Update:** OPEN. FRAS continues to meet reconciliation due dates and has corrected financial misclassifications. Fiscal continues to see improvement in my|CalPERS due to system upgrades that have improved data accuracy in RBF reconciliation report which has allowed for less reconciling items as well as more timely monthly reconciliations. The Pension Benefit Accounting team in FRAS continues frequent communication with IRC 415b Processing team in the Benefit Services Division to ensure consistency between the general ledger and amounts outstanding and paid to the members recorded in my|CalPERS. FRAS is on target to meet implementation due date of July 31, 2018.