Audit Management Letter Comments for the Year Ended 06/30/18

Observation #2: Third Party Administrations

Division Responsible: Health Plan Research and Administration Division

CalPERS' proprietary funds include the activities of the Health Claims Funds (HCF) and the Long-Term Care Fund (LTCF) and the related oversight and monitoring of claims activity administered by third-party administrators (TPAs). During the audit, KPMG noted that CalPERS did not have access to nor routinely reviewed or reconciled the detail claims activity processed by the TPAs to what was reflected in the books and records of either the HCF or the LTCF.

CalPERS should review its oversight controls of the TPAs and update its controls as deemed necessary. At a minimum, KPMG would recommend that CalPERS should reconcile summary TPA claim activity to the detail claim activity on a regular basis.

Health Plan Research and Administration Division's Current Update: OPEN. The processing and validation of detailed health claim expenses and liabilities will go into production on January 15, 2020 for calendar year 2020.

Observation #5: Census Data Division Responsible: Actuarial Office

CalPERS is responsible for maintaining census data for the approximately 2 million members (active and retired) who participate in CalPERS' defined benefit pension plans. Significant elements of census data include: date of birth; years of service; eligible compensation; and gender among other elements.

Effective management of the census data for active employees include procedures to verify the underlying payroll records of the participating employers to determine that the information provided is complete and accurate as this census information is utilized by CalPERS' actuaries to calculate a total pension liability for each of the various defined benefit plans, a significant accounting estimate that is part of the financial reporting process.

In accordance with audit procedures promulgated by the American Institute of Certified Public Accountants (AICPA), KPMG subjected certain Schools and Public Agencies whose employees are actives members of the PERFs to census testwork that included comparing such information to the census file used by CaIPERS. The results of testwork indicated approximately 100 data quality issues such as incorrect date of birth, understated eligible compensation and/or incorrect years of service. Such data quality issues are not unusual for a public employee retirement system with nearly 1.3 million active members.

KPMG understands that the CalPERS continually updates both the information technology and manual controls over its member management system, my|CalPERS.

CalPERS should conduct a root cause analysis for all its known errors and adjust its internal controls accordingly to address any common causes related to data errors. One potential common cause is the timeliness of data submitted through the my|CalPERS portal. Accordingly, KPMG is also recommending that CalPERS enhance its existing internal controls to ensure the timely and accurate reporting of census data by the participating employers.

Actuarial Office's Current Update: RESOLVED. Pending review by financial statement auditor. The Actuarial Office (ACTO) provided data errors to the appropriate units. A couple business areas, Payroll and Refunds, are continuing to work through and correct identified errors. ACTO has developed a process for collecting errors and coordinating with other units for correction. This is an ongoing process that has been incorporated into our regular work cycle. Since new errors are regularly identified, this process won't have an end date and will continue to be part of our regular work cycle.