Report No. A-07-19-00557



Why OIG Did This Review

Certain Medicare contractors are required to separately account for the Medicare segment pension plan assets based on the requirements of their Medicare contracts and Cost Accounting Standards (CAS) 412 and 413.

The HHS, OIG, Office of Audit Services, Region VII pension audit team reviews the Medicare segment pension assets to ensure compliance with Federal regulations.

Previous OIG reviews found that Medicare contractors did not always correctly identify and update the segmented pension assets.

Our objectives were to determine whether Group Health Incorporated (GHI) complied with Federal requirements and the Medicare contracts' pension segmentation requirements when (1) implementing the prior audit recommendation to increase the GHI Cash Balance Plan Medicare segment pension assets as of January 1, 2009, and (2) updating the GHI Cash Balance Plan Medicare segment pension assets from January 1, 2009, to January 1, 2011.

How OIG Did This Review

We reviewed GHI's implementation of the prior audit recommendation, its identification of its GHI Cash Balance Plan Medicare segment, and its update of the GHI Cash Balance Plan Medicare segment pension assets from January 1, 2009, to January 1, 2011.

Group Health Incorporated Understated Its Cash Balance Pension Plan Medicare Segment Pension Assets as of January 1, 2011

What OIG Found

GHI implemented our prior audit recommendation to recognize \$678,667 as the GHI Cash Balance Plan Medicare segment pension assets as of January 1, 2009. Regarding our second objective, GHI did not correctly update the GHI Cash Balance Plan Medicare segment pension assets from January 1, 2009, to January 1, 2011, in accordance with Federal requirements and the Medicare contracts' pension segmentation requirements. GHI identified \$572,866 as the GHI Cash Balance Plan Medicare segment pension assets as of January 1, 2011; however, we determined that those assets were \$939,629 as of that date. Therefore, GHI understated the GHI Cash Balance Plan Medicare segment pension assets as of January 1, 2011, by \$366,763. GHI understated those pension assets because it did not have quality assurance procedures to ensure that it calculated those assets in accordance with Federal requirements when updating the Cash Balance Plan Medicare segments' pension assets from January 1, 2009, to January 1, 2011.

What OIG Recommends and Auditee Comments

We recommend that GHI increase the GHI Cash Balance Plan Medicare segment pension assets by \$366,763 and recognize \$939,629 as the Cash Balance Plan Medicare segment pension assets as of January 1, 2011.

GHI did not directly address our recommendation, and referred to our disagreement with the long-term interest rate assumption that it used to compute accrued liabilities and normal cost. GHI cited this disagreement as a reason for the differences between GHI's and our calculations as conveyed in some of our findings associated with the update of the GHI Cash Balance Plan pension assets.

We maintain that all of our calculations of the Medicare segment pension assets remain valid. Therefore, we maintain that our findings and recommendation remain valid as well. These revised calculations relate only to our companion reports, and not to the calculaton of the Medicare segment assets conveyed in this report. The disagreement with the long-term interest rate assumption is not relevant to this report.