Department of Health and Human Services

OFFICE OF INSPECTOR GENERAL

TRUSTSOLUTIONS, LLC, CLAIMED UNALLOWABLE MEDICARE PENSION COSTS FOR 2007 THROUGH 2009

Inquiries about this report may be addressed to the Office of Public Affairs at Public.Affairs@oig.hhs.gov.

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Office of Inspector General

http://oig.hhs.gov/

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OFFICE OF AUDIT SERVICES FINDINGS AND OPINIONS

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EXECUTIVE SUMMARY

TrustSolutions, LLC, claimed unallowable pension costs of $62,000 for Medicare reimbursement for calendar years 2007 through 2009.

WHY WE DID THIS REVIEW

Medicare contractors are eligible to be reimbursed a portion of their pension costs, which are funded by the annual contributions that these contractors make to their pension plans. The amount of pension costs that the Centers for Medicare & Medicaid Services (CMS) reimburses to the contractors is determined by the cost reimbursement principles contained in the Federal Acquisition Regulation (FAR), Cost Accounting Standards (CAS), and Medicare contracts. Previous Office of Inspector General reviews found that Medicare contractors have not always complied with Federal requirements when claiming pension costs for Medicare reimbursement.

At CMS's request, the Office of Inspector General, Office of Audit Services, Region VII pension audit team reviews the cost elements related to qualified defined-benefit, nonqualified defined-benefit, postretirement benefit, and any other pension-related cost elements claimed by Medicare fiscal intermediaries and carrier contractors and Medicare administrative contractors through Final Administrative Cost Proposals and/or Incurred Cost Proposals (ICPs).

For this review, we focused on one Medicare contractor, TrustSolutions, LLC (TrustSolutions). In particular, we examined the TrustSolutions Medicare segment pension costs that TrustSolutions claimed for Medicare reimbursement and reported on its ICPs.

The objective was to determine whether the calendar years (CYs) 2007 through 2009 pension costs that TrustSolutions claimed for Medicare reimbursement, and reported on its ICPs, were allowable and correctly claimed.

BACKGROUND

During our audit period, TrustSolutions was a wholly owned company of Anthem, Inc., before terminating its Medicare and other operations in May 2012 (after our audit period). TrustSolutions administered the Program Safeguard Contract (PSC) under cost reimbursement contracts with CMS. The PSC was originally awarded to United Government Services, LLC (UGS) in 1999. On September 30, 2002, the PSC was novated from UGS to TrustSolutions. Effective January 1, 2003, the UGS pension plan contained two Medicare segments: one for TrustSolutions and the other for UGS. The TrustSolutions segment was primarily created from UGS Medicare segment employees who transferred out of the UGS Medicare segment into the TrustSolutions Medicare segment.

This report addresses the TrustSolutions Medicare segment pension costs and TrustSolutions's compliance with Federal regulations and the PSC requirements. Although we are addressing this report to National Government Services (NGS), Inc., we will associate the term TrustSolutions with our finding and our recommendation.

CMS reimburses a portion of the annual contributions that contractors make to their pension plans. The pension costs are included in the computation of the indirect cost rates reported on the ICPs. In turn, CMS uses indirect cost rates in reimbursing costs under cost-reimbursement contracts. In claiming costs, contractors must follow cost reimbursement principles contained in the FAR, the CAS, and the Medicare contracts. The cognizant contracting officer will perform a final settlement with the contractor to determine the final indirect cost rates. These rates ultimately determine the final costs of each contract.

We previously reviewed TrustSolutions's allocable pension costs (A-07-14-00451, issued May 28, 2015). That audit report identified the allocable pension costs that TrustSolutions should have used when calculating its indirect cost rates for CYs 2007 through 2009.

At CMS's request, Defense Contract Audit Agency (DCAA) performed an audit of the ICPs that TrustSolutions submitted for CYs 2007 through 2009. CMS will use this allowable pension cost report and the DCAA audit report to determine the final indirect cost rates and the total allowable contract costs for TrustSolutions for CYs 2007 through 2009.

We reviewed $170,537 of pension costs that TrustSolutions reported on its ICPs for CYs 2007 through 2009.

WHAT WE FOUND

TrustSolutions claimed Medicare pension costs of $170,537 for Medicare reimbursement, through its ICPs, for CYs 2007 through 2009; however, we determined that the allowable CAS-based pension costs during this period were $108,316. The difference, $62,221, represented unallowable Medicare pension costs that TrustSolutions claimed on its ICPs for CYs 2007 through 2009. TrustSolutions claimed these unallowable Medicare pension costs primarily because it based its claim for Medicare reimbursement on incorrectly calculated allocable CAS pension costs.

WHAT WE RECOMMEND

We recommend that TrustSolutions work with CMS to ensure that its final settlement of contract costs reflects a decrease in Medicare pension costs of $62,221 for CYs 2007 through 2009.

AUDITEE COMMENTS

In written comments on our draft report, NGS (which responded to our draft report because the TrustSolutions Medicare segment closed in May 2012) did not directly address our recommendation. However, it is clear from the comments that NGS did not agree with our recommendation to decrease the Medicare pension costs by $62,221.

NGS said that the final cost impact on TrustSolutions's ICPs will differ with the results presented in our report, specifically with the net difference of $62,221 that we identified as unallowable Medicare pension costs, and which NGS stated was misleading. NGS also stated that an "aggregated impact can only be determined through a stand-alone assessment of each year's reimbursement claimed on the ICPs in conjunction with any contract ceiling rate limitations."

OUR RESPONSE

After reviewing NGS's comments, we maintain that our finding and recommendation, as stated, remain valid. The objective of our review was to determine whether the pension costs that TrustSolutions claimed for Medicare reimbursement, and reported on its ICPs, were allowable and correctly claimed. Thus, our report identifies the difference between the Medicare pension costs that TrustSolutions claimed on its ICPs and the allowable Medicare pension costs that we determined and that we discuss in greater detail in the body of this report.

NGS is correct in stating that an aggregated impact can be determined only through an assessment of each year's reimbursement in conjunction with any contract ceiling rate limitations. However, the determination of the *aggregated* impact was and is beyond the scope of our review, and in that sense, NGS was incorrect in characterizing the $62,221 difference we identified as "misleading." As explained above in "Background," we reviewed only the Medicare pension costs that TrustSolutions included in its ICPs and requested for Medicare reimbursement. Separately, DCAA reviewed the remaining cost objectives contained in the CYs 2007 through 2009 ICPs.

Thus, the final indirect cost rates that the cognizant CMS contracting officer determines at final settlement will incorporate any rate adjustments as a result of both our and DCAA's reviews. Ultimately, CMS will determine the final impact—or what NGS referred to as aggregated impact—for each year's ICP, observing any contract ceiling rate limitations, and CMS will make final determination of this report's recommendation during the normal audit resolution process after issuance of our report.

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INTRODUCTION

WHY WE DID THIS REVIEW

Medicare contractors are eligible to be reimbursed a portion of their pension costs, which are funded by the annual contributions that these contractors make to their pension plans. The amount of pension costs that the Centers for Medicare & Medicaid Services (CMS) reimburses to the contractors is determined by the cost reimbursement principles contained in the Federal Acquisition Regulation (FAR), Cost Accounting Standards (CAS), and Medicare contracts. Previous Office of Inspector General reviews found that Medicare contractors have not always complied with Federal requirements when claiming pension costs for Medicare reimbursement.

At CMS's request, the Office of Inspector General, Office of Audit Services, Region VII pension audit team reviews the cost elements related to qualified defined-benefit, nonqualified defined-benefit, postretirement benefit, and any other pension-related cost elements claimed by Medicare fiscal intermediaries and carrier contractors and Medicare administrative contractors through Final Administrative Cost Proposals and/or Incurred Cost Proposals (ICPs).

For this review, we focused on one Medicare contractor, TrustSolutions, LLC (TrustSolutions). In particular, we examined the TrustSolutions Medicare segment pension costs that TrustSolutions claimed for Medicare reimbursement and reported on its ICPs.

OBJECTIVE

Our objective was to determine whether the calendar years (CYs) 2007 through 2009 pension costs that TrustSolutions claimed for Medicare reimbursement, and reported on its ICPs, were allowable and correctly claimed.

BACKGROUND

TrustSolutions, LLC

During our audit period, TrustSolutions was a wholly owned company of Anthem, Inc.,[1] before terminating its Medicare and other operations in May 2012 (after our audit period). TrustSolutions administered the Program Safeguard Contract (PSC) under cost reimbursement contracts with CMS.[2] The PSC was originally awarded to UGS in 1999. On September 30, 2002, the PSC was novated from UGS to TrustSolutions. Effective January 1, 2003, the UGS pension plan contained two Medicare segments: one for TrustSolutions and the other for UGS. The TrustSolutions segment was primarily created from UGS Medicare segment employees who transferred out of the UGS Medicare segment into the TrustSolutions Medicare segment.

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[1] In CY 2003, Blue Cross Blue Shield United of Wisconsin and United Government Services, LLC (UGS), were purchased by WellPoint Health Networks, Inc. (WHN). WHN merged with Anthem, Inc., on November 30, 2004, and Anthem then changed its name to WellPoint. On December 2, 2014, WellPoint changed its name to Anthem, Inc.

[2] PSCs were established under the Medicare Integrity Program, which itself was created by section 202 of the Health Insurance Portability and Accountability Act of 1996, P.L. No. 104-191, which added section 1893 to the Social Security Act.

This report addresses the TrustSolutions Medicare segment pension costs and TrustSolutions's compliance with Federal regulations and the PSC requirements. Although we are addressing this report to National Government Services (NGS), Inc., we will associate the term TrustSolutions with our finding and our recommendation.

Medicare Reimbursement of Pension Costs

CMS reimburses a portion of the annual contributions that contractors make to their pension plans. The pension costs are included in the computation of the indirect cost rates reported on the ICPs.[3] In turn, CMS uses indirect cost rates in reimbursing costs under cost-reimbursement contracts. To be allowable for Medicare reimbursement, pension costs must be (1) measured, assigned, and allocated in accordance with CAS 412 and 413 and (2) funded as specified by part 31 of the FAR. In claiming costs, contractors must follow cost reimbursement principles contained in the FAR, the CAS, and the Medicare contracts. The cognizant contracting officer will perform a final settlement with the contractor to determine the final indirect cost rates. These rates ultimately determine the final costs of each contract.[4]

Previous Audit of Allocable Pension Costs

We previously reviewed TrustSolutions's allocable pension costs (A-07-12-00451, issued May 28, 2015; see also Appendix A). That audit report identified the allocable pension costs that TrustSolutions should have used when calculating its indirect cost rates for CYs 2007 through 2009. We recommended that TrustSolutions decrease the Medicare segment pension costs used to calculate its indirect cost rates for CYs 2007 through 2009 by $51,912.

Incurred Cost Proposal Audit

At CMS's request, Defense Contract Audit Agency (DCAA) performed an audit of the ICPs that TrustSolutions submitted for CYs 2007 through 2009. The objective of the DCAA audits was to examine TrustSolutions's ICP and render an opinion on whether the incurred costs claimed by TrustSolutions were reasonable, allocable to the contract, and allowable under the provisions of the contract, part 31 of the FAR, and the U.S. Department of Health and Human Services Acquisition Regulation.

CMS will use this allowable pension cost report and the DCAA audit report to determine the final indirect cost rates and the total allowable contract costs for TrustSolutions for CYs 2007 through 2009.

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[3] At the end of each CY, each Medicare contractor submits to CMS an ICP which reports the Medicare direct and indirect costs that the contractor incurred during that year. The ICP and supporting data provide the basis for the CMS Contracting Officer and the Medicare contractor to determine the final billing rates for allowable Medicare costs.

[4] In accordance with FAR 42.705-1(5)(ii) and FAR 42.705-1(5)(iii)(B), the cognizant contracting officer shall "[p]repare a written indirect cost rate agreement conforming to the requirements of the contracts" and perform a "…[r]econciliation of all costs questioned, with identification of items and amounts allowed or disallowed in the final settlement," respectively.

HOW WE CONDUCTED THIS REVIEW

We reviewed $170,537 of pension costs that TrustSolutions reported on its ICPs for CYs 2007 through 2009.[5]

Achieving our objective did not require that we review TrustSolutions's overall internal control structure. We limited our review to the internal controls related to the pension costs that were included in TrustSolutions's ICPs and ultimately used as the basis for Medicare reimbursement, to ensure that the pension costs were allocable in accordance with the CAS and allowable in accordance with the FAR.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective.

Appendix A contains details of our audit scope and methodology.

FINDING

TrustSolutions claimed Medicare pension costs of $170,537 for Medicare reimbursement, through its ICPs, for CYs 2007 through 2009; however, we determined that the allowable CAS-based pension costs during this period were $108,316. The difference, $62,221, represented unallowable Medicare pension costs that TrustSolutions claimed on its ICPs for CYs 2007 through 2009. TrustSolutions claimed these unallowable Medicare pension costs primarily because it based its claim for Medicare reimbursement on incorrectly calculated allocable CAS pension costs.

Claimed Medicare Pension Costs

TrustSolutions claimed pension costs of $170,537 for CYs 2007 through 2009. We calculated the allowable Medicare pension costs based on separately computed CAS-based pension costs for the Medicare segment and the Other segment in accordance with CAS 412 and 413.

Unallowable Medicare Pension Costs Claimed

After incorporating the results from both DCAA's ICP audits and our previous allocable pension costs audit report, we determined that the allowable Medicare pension costs for CYs 2007 through 2009 were $108,316. Thus, TrustSolutions overstated the allowable pension costs for these CYs by $62,221. This overclaim occurred because TrustSolutions based its allowable pension costs on calculations that did not comply with CAS 412 and 413.

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[5] TrustSolutions's ICPs included only direct costs related to the Medicare segment. We followed TrustSolutions's methodology, and for that reason our audited costs include only direct costs related to the TrustSolutions Medicare segment.

As mentioned above, our previous audit found that TrustSolutions overstated the pension costs used in the calculation of the indirect cost rates for CYs 2007 through 2009 by $51,912.

Our computations of the audited indirect cost rates for the current audit included the adjustments mentioned above. Table 1 below shows the allocable CAS-based pension costs from our previous audit of TrustSolutions's CYs 2007 through 2009 pension costs and compares those amounts with the amounts that TrustSolutions proposed in its ICPs.

Table 1: Previous Audit Findings

Calendar Year	Allocable Per Previous Audit	Per TrustSolutions	Difference
2007	$0	$140,542	($140,542)
2008	0	0	0
2009	88,630	0	88,630
Total	**$88,630**	**$140,542**	**($51,912)**

We then used this information to adjust the fringe rate and, in turn, to calculate the information below.[6] We are not showing our calculations in this report because the rate calculations that TrustSolutions used are proprietary information. It should be noted that TrustSolutions included an applied fringe rate in its overhead and general and administrative cost rates. The inclusion of this applied fringe resulted in TrustSolutions claiming pension costs that exceeded its allocable pension costs. Table 2 below compares the Medicare segment pension costs that we calculated (using our adjusted fringe rates) and the pension costs that TrustSolutions claimed for Medicare reimbursement for CYs 2007 through 2009.

Table 2: Medicare Pension Costs[7]

Calendar Year	Per Audit	Per TrustSolutions	Difference
2007	$0	$170,537	($170,537)
2008	0	0	0
2009	108,316	0	108,316
Total Overclaim of Pension Costs	**$108,316**	**$170,537**	**($62,221)**

RECOMMENDATION

We recommend that TrustSolutions work with CMS to ensure that its final settlement of contract costs reflects a decrease in Medicare pension costs of $62,221 for CYs 2007 through 2009.

[6] A fringe rate is the cost of supplemental benefits provided to an employee divided by the salary dollars.

[7] Our calculations incorporated the rate ceiling associated with the PSC contract. The amounts in Table 2 identify the allowable Medicare segment pension costs as they flow through the ICP. The amounts identified in this table represent the allowable Medicare pension costs during our audit period; and do not represent the total allowable costs on the ICP. The total overclaim of pension costs noted in Table 2 may not impact the total allowable costs claimed on the ICP.

AUDITEE COMMENTS

In written comments on our draft report, NGS (which responded to our draft report because the TrustSolutions Medicare segment closed in May 2012) did not directly address our recommendation. However, it is clear from the comments that NGS did not agree with our recommendation to decrease the Medicare pension costs by $62,221.

NGS said that the final cost impact on TrustSolutions's ICPs will differ with the results presented in Table 2, specifically with the net difference of $62,221 that we identified as unallowable Medicare pension costs, and which NGS stated was misleading. NGS also stated that an "aggregated impact can only be determined through a stand-alone assessment of each year's reimbursement claimed on the ICPs in conjunction with any contract ceiling rate limitations."

NGS's comments are included in their entirety as Appendix C.

OFFICE OF INSPECTOR GENERAL RESPONSE

After reviewing NGS's comments, we maintain that our finding and recommendation, as stated, remain valid. The objective of our review was to determine whether the pension costs that TrustSolutions claimed for Medicare reimbursement, and reported on its ICPs, were allowable and correctly claimed. Thus, our report identifies the difference between the Medicare pension costs that TrustSolutions claimed on its ICPs and the allowable Medicare pension costs that we determined and that we discuss in greater detail in Table 2 and elsewhere in the body of this report.

NGS is correct in stating that an aggregated impact can be determined only through an assessment of each year's reimbursement in conjunction with any contract ceiling rate limitations. However, the determination of the *aggregated* impact was and is beyond the scope of our review, and in that sense, NGS was incorrect in characterizing the $62,221 difference we identified as "misleading." As explained above in "Background," we reviewed only the Medicare pension costs that TrustSolutions included in its ICPs and requested for Medicare reimbursement. Separately, DCAA reviewed the remaining cost objectives contained in the CYs 2007 through 2009 ICPs.

Thus, the final indirect cost rates that the cognizant CMS contracting officer determines at final settlement will incorporate any rate adjustments as a result of both our and DCAA's reviews. Ultimately, CMS will determine the final impact—or what NGS referred to as aggregated impact—for each year's ICP, observing any contract ceiling rate limitations, and CMS will make final determination of this report's recommendation during the normal audit resolution process after issuance of our report.

APPENDIX A: AUDIT SCOPE AND METHODOLOGY

SCOPE

We reviewed $170,537 of Medicare pension costs that TrustSolutions reported on its ICPs for CYs 2007 through 2009 (footnote 5).

Achieving our objective did not require that we review TrustSolutions's overall internal control structure. We limited our review to the internal controls related to the pension costs that were included in TrustSolutions's ICPs and ultimately used as the basis for Medicare reimbursement, to ensure that the pension costs were allocable in accordance with the CAS and allowable in accordance with the FAR.

We performed our audit work in April 2016.

METHODOLOGY

To accomplish our objective, we:

- reviewed the portions of the FAR, CAS, and Medicare contracts applicable to this audit;

- reviewed information provided by TrustSolutions to identify the amount of pension costs used in TrustSolutions's calculation of its indirect cost rates for CYs 2007 through 2009;

- reviewed the results of DCAA's ICP audit and incorporated the results into our calculations of allowable pension costs;

- incorporated the information from our previous audit report (A-07-14-00451, issued May 28, 2015) into our work for this audit; and

- discussed the results of our review with NGS officials on July 14, 2016.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objectives.

APPENDIX B: FEDERAL REQUIREMENTS RELATED TO REIMBURSEMENT OF PENSION COSTS

FEDERAL REGULATIONS

Federal regulations (FAR 31.205-6(j)) address the allowability of pension costs and require that contractors fund the pension costs assigned to contract periods by making contributions to the pension plan.

Federal regulations (CAS 412) (as amended) address the determination and measurement of pension cost components. This regulation also addresses the assignment of pension costs to appropriate accounting periods.

Federal regulations (CAS 413) (as amended) address the valuation of pension assets, allocation of pension costs to segments of an organization, adjustment of pension costs for actuarial gains and losses, and assignment of gains and losses to cost accounting periods.

MEDICARE CONTRACTS

The Medicare contracts require TrustSolutions to submit invoices in accordance with FAR 52.216-7, "Allowable Cost & Payment." Furthermore, FAR 52.216-7(a)(1) addresses the invoicing requirements and the allowability of payments as determined by the Contracting Officer in accordance with FAR subpart 31.2.

National Government Services

6775 West Washington Street
Milwaukee, WI 53214

Mr. Patrick J. Cogley
Office of Audit Services, Region VII
601 East 12th Street, Room 0429
Kansas City, MO 64106

September 16, 2016

Dear Mr. Cogley:

We are in receipt of the draft report regarding the audit of "TrustSolutions, LLC, Claimed Unallowable Medicare Pension Costs for Calendar Years 2007 Through 2009" and thank you for the opportunity to respond.

We have reviewed the report and note that the final cost impact on the Incurred Cost Proposals (ICPs) will differ with the results presented in Table 2 (Medicare Pension Costs) on page 4. The net difference of $62,221 identified in Table 2 and referred as "unallowable Medicare pension costs that TrustSolutions claimed" is misleading. An aggregated impact can only be determined through a stand-alone assessment of each year's reimbursement claimed on the ICPs in conjunction with any contract ceiling rate limitations. The final reimbursement impact will differ with what is portrayed in Table 2.

We appreciate the opportunity to respond to this draft report. If you have any further questions, I can be reached at 414-459-5606 or via email at todd.reiger@anthem.com.

Sincerely,

Todd W. Reiger

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