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CORRESPONDENCE MEMORANDUM

- DATE: November 18, 2015
- **TO:** Audit Committee Members
- **FROM:** Anne Boudreau, Deputy Administrator Division of Retirement Services (DRS)
- **SUBJECT:** Income Continuation Insurance Enrollment and Premium Reporting Audit Management Corrective Action Follow-up Report

This memo is for Audit Committee review and discussion. No action is required.

At the last meeting of the Audit Committee, the results of the Income Continuation Insurance (ICI) Enrollment and Premium Reporting Audit were presented. This memo provides an update on ETF's progress with its action plan. Please find attached the *ICI Enrollment Audit – DRS Action Plan,* which provides the status of each action item.

There are four action items with the status "Not yet started." These all relate to ETF providing additional training and monitoring to the third-party administrator (TPA), and cannot begin until the administrative manuals and procedures have been updated (items 1.2 and 1.3). This is because the updated manuals and procedures are the foundation for the additional training for the TPA (items 1.4 and 4.1). After the training, ETF will be able to audit the results (items 1.5 and 3.1), check for compliance, and identify any additional training needs. The updates of manuals and procedures are almost complete.

Each of these four items also have no planned end date, but "will be ongoing" because there will always be changes to TPA staff, to laws, and to procedures. An ongoing plan for training and auditing for compliance is essential.

Deb Roemer, Director of the Benefit Services Bureau, will be available at the Audit Committee meeting to answer any questions. The Benefit Services Bureau includes oversight of the ICI program, including determining policy and monitoring the contract with the third-party administrator.

Attachment: ICI Enrollment Audit – DRS Action Plan

Reviewed and approved by Matt Stohr, Administrator, **\Division of Retirement Services**

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Electronically Signed 12/1/15

ICI Enrollment Audit – DRS Action Plan

Item	Recommendation	Lead	Begin Date	End Date	Comments			
1	Enhance Third Party Administrator (TPA) management							
	- Use performance-based contract terms related to enrollment processing and monitoring results - Provide additional training to TPA-Aetna							
	- Update administrative manuals and procedures							
1.1	Begin RFP procurement process ahead of Dec	DPS	Sept 2016	March 2017	It is too early to begin the RFP process, but DPS			
	2017 expiration of Aetna contract, including				has made note of the need for better			
	new performance-based requirements related				performance-based requirements and is on			
	to enrollments.				track to begin the RFP process next fall.			
1.2	Update administrative manual and procedures	ESS	June 2015	Sept 2015	Completed. Manual was published online in			
	for local ICI				September.			
1.3	Update administrative manual and procedures	ESS	Sept 2015	Dec 2015	Initial draft completed. Manual is now with DPS			
	for state ICI				for review of policy and plan language. Revision			
					of administrative manual is on track for the			
					projected December completion date.			
1.4	Schedule recurring meetings and training	ESS	Jan 2016	Will be	Not yet started. Meetings will begin upon			
	sessions with TPA to ensure correct application			ongoing	completion of manuals and procedures.			
	of administrative rules and procedures							
1.5	Audit sample of ICI applications to verify correct	ESS	Jan 2016	Will be	Not yet started.			
	application of rules and procedures, and to			ongoing				
	identify additional training needs							
2	Initiate external monitoring by including enrollment process as part of Wipfli engagement							
2.1	Exercise three-year renewal option with Wipfli,	DPS	N/A	Dec 2015	In process.			
	adding ICI enrollment process to contract							
3	Implement monitoring process for EOI applications							
3.1	Audit sample of EOI applications to verify timely	ESS	Jan 2016	Will be	Not yet started.			
	response to members	and DPS		ongoing				

4.1	Educate and monitor TPA regarding correct application of rules, as described in item 1.5 above	ESS	Jan 2016	Will be ongoing	Not yet started.				
5	Provide additional employer training and update employer administration manuals for ICI								
5.1	Create ICI webinar training for all employers	ESS	Sept 2015	Dec 2015	Webinar has been created. Training sessions are scheduled to begin in December 2015.				
6	Improve communication between DPS and ESS								
6.1	Achieve better communication via team projects, cross training, and other opportunities	DPS and ESS	Sept 2015	Will be ongoing	ESS and DPS have been working well together, clarifying boundaries of service and opportunities for cooperative efforts. One example is the administrative manual revision. This is a joint project for these two units, with ESS revising the manual for operations (e.g. how to complete and submit ICI application) and DPS verifying accuracy for policy and plan language (e.g. how to determine eligibility).				
7	Establish an ICI enrollment database								
7.1	Create and implement database as part of Benefit Administration System (BAS) project	DPS	July 2015	Jan 2017	Requirements gathering in process. The database will be part of BAS Rollout 2, which has a tentative implementation date of January 2017.				

Last updated: November 23, 2015