



CITY OF RICHMOND  
CITY AUDITOR

**DATE:** March 3, 2022

**TO:** Lincoln Saunders  
Chief Administrative Officer

**FROM:** Louis Lassiter *LL*  
City Auditor

**SUBJECT:** Human Resources Benefits Reconciliations Audit

The City Auditor's Office has completed the HR Benefits Reconciliations audit and the final report is attached.

We would like to thank the Human Resources and Finance staff for their cooperation and assistance during this audit.

Attachment

cc: The Richmond Audit Committee  
The Richmond City Council  
Sabrina Joy-Hogg, DCAO of Finance & Administration  
Mona Adkins-Easley, Director of Human Resources  
Sheila White, Director of Finance

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City of  
**RICHMOND**  
Office of the City Auditor

Audit Report# 2022-09  
**Human Resources**  
**Benefits Reconciliations**  
March 3, 2022



**Audit Report Staff**

Lou Lassiter, City Auditor  
Lily Hernandez, Deputy City Auditor  
Chassidy Kelly, Auditor  
Rochelle Carter, Management Analyst

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## Highlights

Audit Report to the Audit Committee,  
City Council, and the Administration

### Why We Did This Audit

The Office of the City Auditor conducted this audit as part of the FY2022 audit plan approved by the Audit Committee. The objective for this audit was to evaluate the reconciliation of Health, Dental, COBRA and Life Insurance benefits.

### What We Recommend:

The Director of Human Resources:

- *Ensure all employees' salaries in the VRS System are updated.*
- *Develop and implement a process to ensure salary changes are updated in a timely and consistent basis and automate the salary changes process within City departments and VRS.*
- *Compare the active employee listing against the VRS listing and cancel any policies that are still active for former employees that do not have retiree coverage.*
- *Determine whether refunds can be obtained for the life insurance premiums paid for former employees.*
- *Develop and implement policies and procedures for reconciling the premiums for Health, Life, and Dental benefits.*

Other recommendations to improve operations and internal controls are included in the report.



## Human Resources Benefits Reconciliations

### Background

The City of Richmond is a self-insured employer and offers benefits such as Health, Dental, and Life Insurance for its active employees, as well as insurance related to the Consolidated Omnibus Budget Reconciliation Act (COBRA) for former employees. A self-insured employer is responsible for the payment of all benefits claims and uses its own funds to insure employees. All employees that are classified as full-time active, permanent part-time and provisional are eligible to participate in specific benefits plans dependent on their level of employment. Coverage is effective immediately for employees who are hired on the first day of the month. Coverage starts on the first day of the following month for employees who are hired after the first of the month.

### Needs Improvement

#### Finding #1 – Life Insurance Salary Change Updates

The auditors analyzed a sample of 48 employee salary changes to evaluate whether these changes had been updated in the VRS System and noted 35 of the 48 employee salaries did not match the salaries listed in the VRS System. Some employees' salaries had not been updated as far back as 2012. A sample of 20 employees whose salaries were last updated between 2012 and 2015 to determine whether they were active employees revealed 12 employees were active and 8 were former employees, some of which may have retiree coverage.

#### Finding #2 – Health Insurance Premiums Reconciliations

General Accounting in Finance conducts a Health Insurance reconciliation for the wire transfers, including the wire transfers for Richmond Public Schools. However, a reconciliation is not conducted for the employee premium withholdings. Finance staff needed more guidance. Reconciliations were not performed as staff believed since general accounting performs a reconciliation of the wire transfers, a reconciliation of the premiums was not needed.

#### Finding #3 – Dental Premium Reconciliation for Constitutional Retirees

The auditors analyzed the months of December 2020 and May 2021 to determine whether the dental premium payments for Constitutional retirees matched HR's records. The analysis revealed the HR's records contained 10 retirees who were not included on the vendor's records. Additionally, the vendor's records showed 10 different retirees who were not included in HR's records. The auditors also noted HR does not perform a reconciliation for the Constitutional retirees' premiums for their dental plan. An analysis of the transactions for the months of December 2020 and May 2021 revealed variances in both months.

#### Finding #4 – Reconciliation of COBRA Benefits

HR staff maintain a listing of COBRA participants and their applicable premiums. The dental insurance premiums charged by the vendor to each participant differed from the premiums maintained by HR staff by 2%. Although the vendor's invoices break down the regular premiums and the administrative fee, HR staff were not aware the vendor charged a 2% administrative fee. Additionally, HR Staff did not reconcile the payments for the COBRA premiums.

#### Finding #5 - Benefits Reconciliation Policies and Procedures

HR has not developed policies and procedures for the premium reconciliation process of the Life, Health, and Dental Insurance. Policies and procedures are needed in order to set expectations, ensure compliance and establish accountability.

Management concurred with 11 of 11 recommendations. We appreciate the cooperation received from management and staff while conducting this audit.

## **BACKGROUND, OBJECTIVES, SCOPE, METHODOLOGY, MANAGEMENT RESPONSIBILITY and INTERNAL CONTROLS**

This audit was conducted in accordance with the Generally Accepted Government Auditing Standards promulgated by the Comptroller General of the United States. 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 the audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on the audit objective.

### **BACKGROUND**

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The City of Richmond is a self-insured employer and offers benefits such as Health, Dental, and Life Insurance for its active employees, as well as insurance related to the Consolidated Omnibus Budget Reconciliation Act (COBRA) for former employees. A self-insured employer is responsible for the payment of all benefits claims and uses its own funds to insure employees.

Upon accepting a job offer with the City Of Richmond, all new hires must review and complete the benefits package. Once the desired benefits plans are selected, the Human Resources Department (HR) uploads all elected coverage into the City's financial system, RAPIDS. After entering the benefits plans into RAPIDS, the Payroll Division runs the biweekly payroll and withholds applicable premiums from the employees' paychecks depending on the plans selected.

All employees that are classified as full-time active, permanent part-time and provisional are eligible to participate in specific benefits plans dependent on their level of employment. Coverage is effective immediately for employees who are hired on the first day of the month. Coverage starts on the first day of the following month for employees who are hired after the first of the month.

During the open enrollment period employees can make changes for the upcoming plan year, which runs from January 1st through December 31st. Employees that are hired after the open

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enrollment period must complete the enrollment forms and return them to HR within 30 days of their hire date. Elections are for a 12-month cycle and cannot be changed unless there's a qualifying life event, such as the birth of a child.

#### ***Health and Dental Insurance***

The HR Benefits Team is responsible for enrolling all new hires and terminating coverage for all separated employees. The HR Generalist is responsible for notifying the HR Benefits Team of all separated employees. Employees who are on Leave-Without-Pay are responsible for paying their healthcare premiums to the City by check or money order. Cigna administers the Health and Dental Plans for City employees.

#### ***Life Insurance***

The City offers Basic Group Term Life Insurance to all full-time, permanent employees. Employees are automatically covered for twice their annual salaries. Coverage starts on the first day of employment. The coverage amount differs depending on certain circumstances:

- Accidental Death – The coverage amount is four times an employee's annual salary.
- Dismemberment – The coverage amount is an employee's annual salary.

The Life Insurance Plan is mandatory and the City covers a portion of the premiums for classified employees. The City pays 100% of the premiums for all unclassified full-time employees for up-to-twice their annual salaries.

During Calendar Year (CY) 2021, the Life Insurance premium rate was 1.34%. The City's share was 0.54% of the premiums and the employee's share was 0.80%. This rate is subject to change and it's determined by the Virginia Retirement System (VRS). VRS administers the Life Insurance Plan and Securian/Minnesota Life Insurance Company is the underwriter.

Any qualifying events that may affect the Life Insurance premiums such as marriage or the birth of a child must be communicated within the first thirty days of the event. In the event of a salary change, HR staff are responsible for keying the salary adjustments in the VRS System.

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***Optional Life Insurance:***

Employees who have coverage under the Basic Group Term Life Insurance may also purchase additional optional life insurance for themselves, their spouse, and eligible children. Employees may purchase coverage of up to four times their salaries. If the option elected provides additional insurance coverage of \$400,000 or more, the employee must complete an Evidence of Insurability form. The optional insurance coverage amounts are as follows:

<b>Optional Insurance Amounts</b>			
<b>Option</b>	<b>Employee</b>	<b>Spouse</b>	<b>Child(ren)</b>
<b>1</b>	1 x Salary	.5 x Salary	\$10,000
<b>2</b>	2 x Salary	1.0 x Salary	\$10,000
<b>3</b>	3 x Salary	1.5 x Salary	\$20,000
<b>4</b>	4 x Salary	2.0 x Salary	\$30,000

***COBRA***

COBRA allows continuation of health coverage for former employees and their families. Former employees, their spouses and dependents can elect to continue coverage for any of the following:

- Termination of service
- Divorce
- Death
- Loss of dependent status

The HR Generalist is responsible for notifying the HR Benefits team of an employee's separation from the City. Separated employees who had health care coverage with the City at any point during their employment are eligible for COBRA for up to 18 months. Upon the death of an employee, all dependents are eligible for COBRA for up to 36 months. However, all covered

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dependents must be 25 years of age or younger. Cigna, the City's healthcare insurance vendor, activates COBRA coverage upon notification from HR.

The City does not pay for any of the COBRA premiums. The former employees are responsible for paying 100% of their monthly premiums plus a 2% administrative fee, which are paid directly to the insurance vendor.

#### ***Benefits Reconciliation Process:***

The reconciliation process consists of reviewing the benefit premium invoices against employees' payroll deductions. HR staff are responsible for working closely with the Payroll Division staff to ensure that benefits are billed, paid and reconciled accurately and timely. HR staff are responsible for enrolling and maintaining employees' benefits information. The Payroll Division, within the Finance Department, is responsible for tracing the billed premiums to the amounts withheld for dental and life insurance.

## **OBJECTIVE**

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The objective for this audit was to evaluate the reconciliation of Health, Dental, COBRA, and Life Insurance benefits.

## **SCOPE**

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The scope of the audit covered reconciliations of premiums withheld from employees for Health, Dental, COBRA, and Life Insurance benefits during the twelve months ended June 30, 2021 and the current environment.

## **METHODOLOGY**

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The Auditors performed the following procedures to complete this audit:

- Interviewed staff and performed walkthroughs to understand the premium reconciliation process;
- Stratified salary changes based on reason for the salary adjustment. Analyzed a random sample of approximately 5% to ensure salaries had been updated in the VRS System;



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- Stratified employee terminations based on reason for separation from the City. Analyzed a random sample of 10% to ensure termination of coverage;
- Traced a random sample of two months for the Life Insurance reconciliations to ensure the figures were properly supported;
- Reconciled the premiums paid by the COBRA participants against the funds submitted to the City;
- Compared the Health Insurance premiums to the wire transfers;
- Analyzed a random sample of two months for the Dental Insurance premium reconciliations for active employees as well a Constitutional retirees; and
- Conducted other tests, as deemed necessary.

## **MANAGEMENT RESPONSIBILITY**

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City of Richmond management is responsible for ensuring resources are managed properly and used in compliance with laws and regulations; programs are achieving their objectives; and services are being provided efficiently, effectively, and economically.

## **INTERNAL CONTROLS**

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According to the Government Auditing Standards, internal control, in the broadest sense, encompasses the agency's plan, policies, procedures, methods, and processes adopted by management to meet its mission, goals, and objectives. Internal control includes the processes for planning, organizing, directing, and controlling program operations. It also includes systems for measuring, reporting, and monitoring program performance. An effective control structure is one that provides reasonable assurance regarding:

- Efficiency and effectiveness of operations;
- Accurate financial reporting; and
- Compliance with laws and regulations.

Based on the audit test work, the auditors concluded internal controls need improvements in the following areas:

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- Reconciliation of premiums withheld and subsequent payments.
- Updating salary changes and removing former employees timely.
- Establishing policies and procedures.

These deficiencies are discussed throughout the report.

## **FINDINGS and RECOMMENDATIONS**

### **What Needs Improvement**

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#### ***Finding #1 - Life Insurance Salary Change Updates***

##### **Condition:**

All full time eligible employees participate in a group life insurance program through VRS. VRS manages employee coverage for those enrolled in Basic Group Life Insurance. Securian (*underwriter*) manages coverage for Optional Life Insurance. HR staff have access to the VRS System and are responsible for updating changes to employees' salaries. HR staff submit salary changes for employees who have Optional Life Insurance coverage to Securian.

The auditors analyzed a sample of 48 employee salary changes to evaluate whether these changes had been updated in the VRS System and noted 35 of the 48 employee salaries did not match the salaries listed in the VRS System as follows:

- 13 Salaries matched the VRS salaries listing.
- 35 Salaries did not match the VRS salaries listing:
  - 12 salaries were higher on the VRS listing due to being updated subsequent to the audit scope.
  - 23 salaries were lower on the VRS listing, which means they have not been updated.

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Some employees' salaries had not been updated as far back as **2012**. The auditors analyzed a sample of 20 employees whose salaries were last updated between 2012 and 2015 to determine whether they were active employees:

- 12 were active employees.
- 8 were former employees, some of which may have retiree coverage.

Additionally, HR staff did not submit salary changes for employees who were enrolled in Optional Life Insurance coverage to the vendor.

#### Criteria:

- Salary changes should be updated in a timely and consistent basis.
- Life insurance coverage for former employees should be terminated upon separation from City employment.

#### Cause:

- HR staff do not have a formalized process to ensure salary changes are updated timely and consistently.
- Changing salaries in the VRS database is a manual process, which competes with other priorities.
- The Payroll Division performs a monthly reconciliation. However, variances were not communicated timely to HR staff. Identified variances for August 2019 were not sent to HR until June 2020. Once the variances are communicated to HR staff, these variances are not resolved.

#### Effect:

Without updated salaries, the coverage amount may not be consistent with the employees' current salaries. Additionally, premiums may differ when employees' salaries are not updated on a consistent basis.

Also, the City may continue to pay premiums for separated employees.

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### Recommendations:

- 1. We recommend the Director of the Human Resources Department ensure all employees' salaries in the Virginia Retirement System are updated.*
- 2. We recommend the Director of the Human Resources Department develop and implement a process to ensure salary changes are updated in a timely and consistent basis and automate the salary changes process within City departments and the Virginia Retirement System.*
- 3. We recommend the Director of the Human Resources Department compare the active employee listing against the Virginia Retirement System listing and cancel any policies that are still active for former employees that do not have retiree coverage.*
- 4. We recommend the Director of Human Resources Department develop and implement a process to ensure the life insurance coverage for terminated employees are canceled as appropriate immediately upon separation.*
- 5. We recommend the Director of the Human Resources Department determine whether refunds can be obtained for the life insurance premiums paid for former employees.*
- 6. We recommend the Director of the Finance Department ensure staff follow up on identified Life Insurance variances to Human Resources in a timely manner.*
- 7. We recommend the Director of the Human Resources Department ensure Life Insurance variances identified in the monthly reconciliations are resolved in a timely manner.*

### *Finding #2 – Health Insurance Premiums Reconciliations*

#### *Condition:*

General Accounting within the Finance Department conducts a Health Insurance reconciliation for the wire transfers, including the wire transfers for Richmond Public Schools. However, a reconciliation is not conducted for premiums withheld from employees.

#### *Criteria:*

Reconciliations should be done on a consistent basis to ensure the accuracy and the integrity of a transaction.

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#### Cause:

Finance staff needed more guidance. Reconciliations were not performed as staff believed since general accounting performs a reconciliation of the wire transfers, a reconciliation of the premiums was not needed.

#### Effect:

Staff may not capture changes in health plan as well as changes for separated employees.

#### Recommendation:

- 8. We recommend the Director of the Finance Department implement a process to reconcile the Health Insurance premiums withheld from employees.***

### ***Finding #3 – Dental Premium Reconciliation for Constitutional Retirees***

#### Condition:

Constitutional retirees submit Health Insurance premiums monthly to a third party vendor. In turn, the vendor submits those funds to HR. HR staff maintain a listing of the Constitutional retirees and their Dental Plans.

The auditors analyzed the months of December 2020 and May 2021 to determine whether the payments submitted by the vendor matched HR's records. The analysis revealed the HR's records contained 10 retirees who were not included on the vendor's records. Additionally, the vendor's records showed 10 different retirees who were not included in HR's records.

The records for a Constitutional retiree's dental plan differed between HR and the vendor. HR listed the employee's coverage as a "single dependent" while the vendor listed the coverage as "employee plus spouse".

The auditors also noted HR does not perform a reconciliation for the Constitutional retirees' Dental Plans. An analysis of the transactions for the months of December 2020 and May 2021 revealed variances in both months.

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#### Criteria:

A reconciliation should be performed to ensure variances are analyzed and corrected in a timely manner. The update should consist of verifying that all retirees are enrolled in the proper Dental Plan and paying premiums accordingly.

#### Cause:

HR staff did not have procedures in place to guide them through the process.

#### Effect:

A Constitutional retiree's Dental Insurance Plan was incorrectly listed, which caused monthly overpayments of approximately \$32.

#### Recommendation:

- 9. We recommend the Director of the Human Resources Department establish and implement a process to ensure the Dental Insurance Premiums for Constitutional retirees are reconciled on a monthly basis.*

### ***Finding #4 – Reconciliation of COBRA Benefits***

#### Condition:

HR staff maintain a listing of COBRA participants and their applicable premiums. The Dental insurance premiums charged by the vendor to each participant differed from the premiums maintained by HR staff by 2%. Although the vendor's invoices break down the regular premiums and the administrative fee, HR staff were not aware the vendor charged a 2% administrative fee.

#### Criteria:

The Department of Labor's Employee Guide to Health Benefits under COBRA states, "in determining COBRA premiums, the plan can include the costs paid by employees and the employer, plus an additional 2 percent for administrative costs."

#### Cause:

HR staff did not reconcile the COBRA premiums charged to each participant against and the money submitted to the City by the vendor.

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### Effect:

Vendor errors and overbillings would not be captured as HR relies solely on the COBRA vendor.

### Recommendation:

*10. We recommend the Director of the Human Resources Department develop and implement a process for COBRA premium reconciliations.*

### *Finding #5 – Benefits Reconciliation Policies and Procedures*

#### Condition:

HR has not developed policies and procedures for the premium reconciliation process of the following benefits:

- Life Insurance
- Dental Insurance
- Health Insurance

#### Criteria:

Policies and procedures are needed in order to set expectations, ensure compliance and establish accountability. They provide guidance to employees to perform their duties consistently in conformance with policies. Also, they can be used as an effective employee training tool.

#### Cause:

Management did not have proper oversight over the benefits reconciliation process and did not ensure staff had written procedures to execute their responsibilities.

#### Effect:

Management cannot properly evaluate employee performance without written policies and procedures.

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**Recommendation:**

- 11. We recommend the Director of the Human Resources Department develop and implement policies and procedures for reconciling the premiums for Health, Life, and Dental benefits.*



**APPENDIX A: MANAGEMENT RESPONSE FORM**

**2022-09 HR Benefits Reconciliations Audit**

#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
1	We recommend the Director of the Human Resources Department ensure all employees' salaries in the Virginia Retirement System are updated.	Y	The Human Resources Director has initiated hiring to address short-staffing. Additionally, technology automation, which is on the list of pending items with DIT, is forthcoming. Staff will manually scrub the data, with additional reviews added, to ensure progress.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Human Resources Director		1-Sep-22
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
2	We recommend the Director of the Human Resources Department develop and implement a process to ensure salary changes are updated in a timely and consistent basis and automate the salary changes process within City departments and the Virginia Retirement System.	Y	The Human Resources Director will develop and implement a process. Ultimately, the process will include additional technology automation, with Human Resources partnering with DIT to accomplish this recommendation.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Human Resources Director		1-Sep-22
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
3	We recommend the Director of the Human Resources Department compare the active employee listing against the Virginia Retirement System listing and cancel any policies that are still active for former employees that do not have retiree coverage.	Y	The Human Resources Director will ensure that the active employee listing is compared against the Virginia Retirement System listing to ensure that policies are cancelled if the former employees does not have retiree life insurance coverage.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Human Resources Director		1-Sep-22
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
4	We recommend the Director of Human Resources Department develop and implement a process to ensure the life insurance coverage for terminated employees are canceled as appropriate immediately upon separation.	Y	Processes will be developed and implemented to ensure life insurance coverage is canceled promptly for terminated employees who are not eligible for continued life insurance coverage.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Human Resources Director		1-Sep-22
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION

**APPENDIX A: MANAGEMENT RESPONSE FORM**

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#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
5	We recommend the Director of the Human Resources Department determine whether refunds can be obtained for the life insurance premiums paid for former employees.	Y	Refunds are credited on the following month's invoice. If a review determines that a refund is owed, the updated record will trigger a refund/credit on the following invoice, as permitted by VRS.
	<b>TITLE OF RESPONSIBLE PERSON</b>		<b>TARGET DATE</b>
	Human Resources Director		completed / answered
	<b>IF IN PROGRESS, EXPLAIN ANY DELAYS</b>		<b>IF IMPLEMENTED, DETAILS OF IMPLEMENTATION</b>
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
6	We recommend the Director of the Finance Department ensure staff follow up on identified Life Insurance variances to Human Resources in a timely manner.	Y	The Director of Finance will ensure staff identify insurance variances to Human Resources in a timely manner.
	<b>TITLE OF RESPONSIBLE PERSON</b>		<b>TARGET DATE</b>
	Finance Director		1-Sep-22
	<b>IF IN PROGRESS, EXPLAIN ANY DELAYS</b>		<b>IF IMPLEMENTED, DETAILS OF IMPLEMENTATION</b>
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
7	We recommend the Director of the Human Resources Department ensure Life Insurance variances identified in the monthly reconciliations are resolved in a timely manner.	Y	The Director of Human Resources will ensure staff resolves identify insurance variances in a timely manner.
	<b>TITLE OF RESPONSIBLE PERSON</b>		<b>TARGET DATE</b>
	Human Resources Director		1-Sep-22
	<b>IF IN PROGRESS, EXPLAIN ANY DELAYS</b>		<b>IF IMPLEMENTED, DETAILS OF IMPLEMENTATION</b>
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
8	We recommend the Director of the Finance Department implement a process to reconcile the Health Insurance premiums withheld from employees.	Y	The Director of Finance will work with the Director of Human Resources to implement a process to reconcile Health Insurance premiums withheld from employees.
	<b>TITLE OF RESPONSIBLE PERSON</b>		<b>TARGET DATE</b>
	Finance Director		1-Sep-22

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	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
9	We recommend the Director of the Human Resources Department establish and implement a process to ensure the Dental Insurance Premiums for Constitutional retirees are reconciled on a monthly basis.	Y	The Director of Human Resources will establish and implement a process to ensure Dental Insurance Premiums for Constitutional retirees are reconciled monthly.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Human Resources Director		1-Sep-22
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
10	We recommend the Director of the Human Resources Department develop and implement a process for COBRA premium reconciliations.	Y	The Director of Human Resources will establish and implement a process to ensure COBRA Premiums are reconciled.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Human Resources Director		1-Sep-22
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
11	We recommend the Director of the Human Resources Department develop and implement policies and procedures for reconciling the premiums for Health, Life, and Dental benefits.	Y	The Director of Human Resources will establish and implement a polices and procedures for reconciling premiums for Health, Life and Dental benefits.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Human Resources Director		1-Sep-22
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION