City of San Diego Memorandum

DATE ISSUED:	April 1, 2005
ATTENTION:	Government Efficiency & Openness Committee (GEOC) Members
SUBJECT:	San Diego City Employees' Retirement System (SDCERS) Death Match Audits and Overpayment Information
COPY:	John Torell, CPA, Auditor and Comptroller Larry Tomanek, CPA, Asst. Auditor and Comptroller

BACKGROUND

At recent GEOC meetings there have been discussions regarding SDCERS making pension benefit payments to deceased persons. While it is inevitable that some deaths will not be known until after a payment has been made, there are procedures to mitigate these "overpayments." A common procedure is to perform periodic Social Security Administration death match audits. SDCERS began performing these audits on a quarterly basis in September of 2004. Previously the matches were done sporadically starting in 1996.

During its February 14, 2005 meeting, the Government Efficiency & Openness Committee requested the City Auditor to work with SDCERS to:

- Perform a survey and provide a report regarding generally accepted practices by public and private entities concerning the frequency of Social Security Administration death match audits, and to make recommendations to SDCERS management for adjustments to our system as appropriate.
- Provide copies of the SDCERS quarterly death match audit reports performed since 2003.
- Provide the total number and dollar value of all overpayments made by SDCERS since 1996, broken down on a yearly basis, and to include an accounting of the portion of those overpayments recovered by SDCERS.

CONCLUSIONS

Based on the information gathered and the analysis performed, the following conclusions are provided to your Committee and for the consideration of the SDCERS Board.

We noted a deficiency in the internal controls over the tracking of overpayments and collection actions taken to recover such overpayments. We recommend that a comprehensive methodology be developed to track the status of overpayments to ensure timely follow-up action to optimize recovery of overpaid amounts. Procedures should be

established to ensure prompt referral of all uncollected amounts to Treasurer Collections for follow-up action.

Concerning the frequency of death match audits, it appears the majority of governmental and private sector entities with defined benefit pension plans perform death match audits quarterly or less frequently. However, due to the amount of past overpayments and the degree of public scrutiny concerning this issue, it is our opinion that SDCERS should consider performing death match audits on a monthly basis for the next twelve months. For example, during 2004 overpayments totaling approximately \$19,700 may have been prevented if monthly audits had been performed. Performing monthly death match audits on a temporary basis (at an estimated additional annual cost of \$4,750) would enable SDCERS administrators to determine if such continued action is warranted and cost effective.

Although the overpayments discussed in this report are a small fraction of annual payments made, SDCERS should consider reviewing the nature of past overpayments that have occurred to determine if additional measures are warranted to minimize the risk of overpayments in the future.

Finally, we recommend that SDCERS consider whether staff resources should be redirected to expedite the review and close-out of deceased retirees' accounts discovered from prior audits. The list of underpayments to deceased retirees should also be reviewed to determine if additional money is owed to these individuals and payments made accordingly

A summary schedule of overpayments and details of work performed are presented below.

Summary of Overpayments -

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Although SDCERS has maintained overpayment reports, there is no comprehensive methodology utilized to prepare a master list of overpayments and amounts recovered from 1996 to 2004. Such a master list would facilitate the on-going tracking of overpayments to ensure all overpayments are repaid. Based on the overpayment reports provided by SDCERS, and the additional research performed on deceased retirees by reviewing pension data, a summary of all overpayments discussed in this report is presented in Table A on the next page. In addition, Audit Division is in the process of finalizing an audit regarding payments made to retirees under the Corbett Settlement and additional over/under payments may be identified.

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Year	Number of Overpayments	Amount of Overpayments	Overpayments Repaid / On Repayment Schedule	Amount Uncollected
1999	. 5	\$131,237	(\$4,348)	\$126,889
2000	5	4,916	(972)	3,944
2001	51	56,665	(45,323)	11,342
2002	84	221,450	(197,469)	23,981
2003	80	151,344	(106,296)	45,048
2004	67	55,949	(33,367)	22,582
Total	292	\$621,561	(\$387,775)	\$233,786

TABLE A – Summary of Overpayments

SDCERS processes approximately 60,000 pension payments annually totaling over \$141 million. Of the \$621,561 in overpayments identified, approximately \$387,775 has been recovered or is on a repayment schedule, \$107,054 remains uncollected, and \$126,732 has been written off. The overpayments include \$262,546 to deceased retirees, \$126,732 to a spouse who was ineligible to receive a refund of the member's contributions, \$41,489 involving fraud, and \$190,794 in other overpayments for various reasons.

Details of Work Performed -

1) Accepted Practices of Performing Death Match Audits

The Audit Division and SDCERS surveyed 25 entities (22 governmental and 3 nongovernmental) to determine how frequently death match audits were performed by entities with defined benefit pension plans. The survey showed 12% of the entities perform death match audits monthly, 44% perform audits quarterly, and 44% perform audits less often than quarterly. The survey results are shown below.

Frequency of Death Match Audits	Number of Governmental Entities	Number of Non-Gov. Entities	Total Entities	Percentage
Monthly	_3		3	12%
Quarterly	10	1	11	44%
Semi-Annually	2	2	4	16%
Annually	5		5	20%
Bi-Annually	1		1	4%
Occasionally	1		1	4%
TOTAL	22	3	25	100%

TABLE B – Survey Results

The three entities that perform monthly audits have approximately 32,000, 47,000 and 3,800 retirees that receive monthly pension payments, compared to SDCERS which pays approximately 5,400 retirees monthly. Although three audits were completed in calendar year 2004 (April, September, and December), SDCERS had not been performing audits

on a quarterly basis prior to that time. Increasing the frequency of audits to monthly may reduce the risk of overpayments to deceased retirees. Based on the current data match fee of \$592, the additional cost to do monthly death match audits would be approximately \$4,750 annually.

2) SDCERS Death Match Audits Reports Since 2003

SDCERS has completed four death match audits since 2003. Death match reports were issued on November 11, 2003, April 23, 2004, September 1, 2004, and December 22, 2004. These reports are attached for review. All of the names and social security numbers have been removed in order to protect the individual's confidential information. SDCERS is currently in the process of finalizing another death match report.

3) Identified Overpayments and Associated Recoveries -

SDCERS does not have comprehensive reports detailing all overpayment and amounts recovered from 1996 to 2004. However, SDCERS has annual reports of "Overpayments Under \$5,000" for the calendar years 2001 through 2004. The cover letters on the 2002 and 2004 reports showed they were provided to the SDCERS Board on January 7, 2003 and February 9, 2005 respectively. SDCERS also prepared a schedule of overpayments over \$5,000, with amounts dating back to 1999. No other overpayment reports were provided by SDCERS for review.

The SDCERS reports provided did not capture all overpayments made to deceased retirees. Amounts paid to deceased retirees after the date of death are not recorded on these SDCERS reports if the overpayment is quickly recovered. Since the SDCERS overpayment reports do not capture all overpayments made to retirees after the date of death, the Audit Division used pension data from the Auditor's and SDCERS' pension data bases to determine the number and amount of overpayments that occurred, and the amount recovered for the last three years. It is an internal control weakness not to have a comprehensive method of recording and tracking all overpayments to ensure they are recovered.

By utilizing the data provided and reviewing information in the systems, we determined the number and amount of overpayments and recoveries to deceased retirees for calendar years 2002, 2003, and 2004. Since there are almost 500 deceased retirees in this threeyear period, we relied on the information in the pension databases, and did not verify the amounts by tracing information back to supporting documentation in the retirees' files; therefore, some discrepancies may exist. For example, if a repayment was received by SDCERS, and the amount collected was not noted in the data we reviewed, the amount uncollected will be overstated. A summary of our research of deceased retirees during 2002 through 2004 is shown on the next page.

			Number				
		Number	of	Number			
		of	Retirees	of			
	Number	Retirees	Overpaid	Retirees			
	of	with <u>No</u>	During	Overpaid			
	Deceased	Over-	Month of	After			
Year	Retirees		Death	Month of	Amount	Amount	Amount
1 cai	Kethees	payment	Only	Death	Overpaid	Recovered	Uncollected
2002	168	98	58	12	\$162,669	(\$146,843)	\$15,826
2003	162	99	52	11	33,602	(30,043)	3,559
2004	164	108	46	10	37,114	(20,843)	16,271

TABLE C – Overpayments to Deceased Retirees per Pension Data

In addition we reviewed the reports that were available from SDCERS which included payments made to retirees after their death and other overpayments going back to 1999. A summary of the overpayments from the SDCERS reports is shown below, excluding fifteen (15) overpayments due to retirees' death which were included above so they are not counted twice.

Year Reported	Number of Overpayments	Amount of Overpayments	Overpayments Repaid / On Repayment Schedule [1]	Amount Uncollected
1999	1	\$126,732	(\$0)	\$126,732
2001	24	36,925	(36,925)	0
2002	14	58,781	(50,626)	8,155
2003	17	117,742	(76,253)	41,489
2004	11	18,835	(12,524)	6,311
Total	67	\$359,015	(\$176,328)	\$182,687

 TABLE D – Overpayments per SDCERS Reports

[1] Repayment of \$124,795 out of the \$176,328 was by monthly payment arrangements or by amounts being withheld from pensions until the amount owed is repaid. The actual amount paid to date on these arrangements was not determined.

SDCERS processed approximately 300,000 payments totaling over \$700 million during the five year period shown above, and the \$359,015 in overpayments represents approximately 0.05% of total payments made. Two overpayments account for 92% of the \$182,687 that remain uncollected or that are not on a repayment schedule. One of these overpayments was reported in 1999 in which a spouse received a refund of the member's contributions totaling \$126,732 that she was not entitled to. SDCERS staff advised that the Board voted not to bring suit to collect this overpayment because the spouse died, and there were limited assets in the estate left to support a minor child. This amount will not be collected. The second overpayment was an instance of fraud which began in 1996 and discovered in 2003 totaling \$41,489 involving a deceased retiree. This case is currently in litigation. The remaining 65 overpayments were caused primarily by death of a retiree (prior to 2002), 13th check and a portion of Corbett payments made to recipients that were not entitled to the payments, health insurance payment errors, and pension calculation errors that were found and corrected.

We also reviewed the data available on the retirees still in Suspense status. When SDCERS is notified of a retirees' death, the pension account is put in a suspended status to stop future payments. Over the years, the Suspended list has grown because these accounts were not closed out and removed from the pension system. SDCERS has been reviewing these suspended accounts and completing the "closed file" work. When the closed file work is completed, retirees' accounts are placed in a Terminated status.

The Audit Division was provided a list of 114 retirees with suspended accounts through December 2004. We found 2 additional suspended accounts during our review bringing the total to 116. We determined that 20 of these accounts had already been terminated and 21 accounts were for retirees with a date of death in 2002, 2003 or 2004. All of these 41 retirees are accounted for in TABLE C above. The result of our review for the remaining 75 deceased retirees from 1999 through 2001 is shown below.

Year	Number of Deceased Retirees	Number of Retirees with <u>No</u> Over- payment	Number of Retirees Overpaid <u>During</u> Month of Death Only	Number of Retirees Overpaid <u>After</u> Month of Death	Amount Overpaid	Amount Recovered	Amount Uncollected
Prior to							
1999	24 [1]	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
1999	8	4	3	1	\$4,505	(\$4,348)	\$157
2000	8	3	. 2	3	4,916	(972)	3,944
2001	35	8	20	7	19,740	(8,398)	11,342
Total	75	15	25	11	\$29,161	(\$13,718)	\$15,443

 TABLE E – Overpayments to Retirees on Suspended List

[1] There were 24 deceased retirees' accounts in Suspended status that we were unable to determine if there were any overpayments that occurred due to lack of data available prior to 1999.

SDCERS also provided a list of 179 deceased retirees, 175 of which are from the March 5, 2002 death match audit. This list was provided to us in February 2005. Based on this list we were able to determine that SDCERS staff had completed the review for 118 of these accounts; however, SDCERS needs to finalize their course of action for those listed with over/under payments. The remaining 61 were included on the list of 114 provided to auditors and reviewed above.

The most recent SDCERS death match audit issued December 22, 2004 found 74 matches, and 60 of these were from prior audits. All but 4 of these 74 accounts were

already in Suspended status to stop payment. The deceased retirees' accounts from prior audits need to be closed out in a more timely manner in order to reduce the number of matches in future audits. SDCERS advised that due to other priorities, only one staff member has been assigned to spend approximately 15% of his time to review and close out the files of deceased retirees found from prior death match audits.

In addition, while reviewing the retirees listed in Tables C and E, we found 40 instances in which money may still be owed to the estate of deceased retirees totaling approximating \$24,700. Our list of underpayments has been provided to SDCERS. SDCERS staff has advised that approximately \$4,000 of this amount has already been included in the March 2005 monthly pension payroll.

The Auditor's staff would welcome the opportunity to assist SDCERS in implementing adequate, cost-effective controls in the area of pension overpayments and collections.

Respectfully submitted,

Darlere Mono Fires Darlene Morrow-Truver, CPA

Audit Division Manager



AUDIT REPORT

November 11, 2003

Lawrence B. Grissom SDCERS Retirement Administrator

SUBJECT: RETIREE DEATH MATCH AUDIT

Staff recently performed a match of active retired members and widows from the August 31, 2003 pension payroll to Social Security Administration (SSA) records via Pension Benefits Information Services (PBI).

1. There were eleven SDCERS active pension members who were matched to the PBI deceased database. SDCERS Operations Division has been notified of the matched population.

RECOMMENDATIONS:

Suspend all benefit payments and obtain death certificates from the family or the appropriate State.

Calculate any applicable overpayment and collect excess benefits by reducing the member's death benefit and or collection from the member's estate.

Perform the PBI match process quarterly to minimize potential for overpayment.

Respectfully Submitted,

Patrick Lane Division Manager SDCERS Audit Division

Cleopatra Jones-Patrick Internal Auditor SDCERS Audit Division

Death Match Audit Conducted by: Cleopatra Jones-Patrick and Patrick Lane 10/24/03

·	SDCERS				Suspense	Excess	Estimated
SS#	Notes	Last Name	First Name	DOD	Date	Months	Overpayment
	1			8/20/2003	8/1/2003	0.00	N/A
	2			6/23/2003	10/1/2003	3.23	\$ 3,517.47
	2			8/18/2003	9/1/2003	0.42	\$ 194.88
	2	•		4/4/2003	10/1/2003	5.86	\$ 3,301.45
	. 2			8/25/2003	10/1/2003	1.19	\$ 1,252.24
•	· 2 ·			8/15/2003	10/1/2003	1.51	\$ 2,748.83
	2			7/5/2003	10/1/2003	2.83	\$ 1,086.60
	2		4 a	10/23/2002	10/1/2003	11.23	\$ 5,980.47
	2			11/13/2002	10/1/2003	10.56	\$ 106,399.26
	4			5/4/1996	10/1/2003	88.00	\$ 43,600.00
	3	-		8/11/1993	N/A	0.00	N/A

SDCERS Notes

1		
2		
3	•	
4		

Death processed timely, no overpayment made

Account suspended, potential overpayment requiring collection

Wife is using deceased members SS#

SDCERS received a notorized letter indicating PBI records are incorrect. Signatures are suspect. SDCERS has suspended the benefit and requested a death certificate from Nevada



April 23, 2004

San Diego City Employees' Retirement System Board of Administration Audit Committee

SUBJECT: RETIREE DEATH VERIFICATION AUDIT

Staff performs a Death Verification Audit on a quarterly basis. The purpose of this audit is to ascertain whether the San Diego City Employees' Retirement System (SDCERS) is at risk of any payments being distributed on deceased member or survivor accounts. Enclosed is the Death Verification Audit Report outlining the results of the audit conducted as of February 27, 2004.

Respectfully Submitted,

Lawrence B. Grissom SDCERS Retirement Administrator



AUDIT REPORT

April 23, 2004

Lawrence B. Grissom Retirement Administrator

SUBJECT: RETIREE DEATH VERIFICATION AUDIT

We recently performed a match of retired members from the February 27, 2004 pension payroll to Social Security Administration (SSA) via Pension Benefit Information (PBI). Upon review of the research, we noted the following:

1.

2.

There were three active pension members who were matched to deceased individuals. There was one additional active pension payee for whom the match report indicated an invalid social security number was submitted.

RECOMMENDATIONS:

Suspend benefits for

immediately and obtain death certificates. Terminate benefits accordingly; determine exact over or underpayments individually.

Obtain an accurate social security number for to ensure prospective death verification matches are successful prospectively.

There were a total of 107 members in suspended status as of February 27, 2004, of which, 96 have been in suspense since the last audit report, submitted by the SDCERS Audit Division, November 21, 2004. Staff is currently researching outstanding issues related to these suspended benefits and terminating benefits as resolutions are reached.

In addition to the 96 suspended members previously mentioned, there were 11 additional suspended pension payees reported as deceased by the SSA and respective State Departments of Vital Statistics. These 11 payees were suspended between September 2003 and February 2004 due to notice of death.

SDCERS

Death Verification Audit 2004 Page 2 of 2

RECOMMENDATIONS:

Continue to review each Suspended Member, determine and execute the necessary steps to finalize the member.

Determine the exact amount of any over or underpayments.

Initiate collection efforts of any overpayments, including referral to the City Treasurer for collection, if necessary.

Initiate payment of monies owed by coordinating with Auditor's Office Payroll staff.

Refine procedures for future retiree members placed in suspense to ensure all suspended members are finalized in a timely manner.

The SDCERS Audit Division will perform a Death Verification Audit quarterly to ensure timely finalization of suspended members, to reduce occurences of overpayments, and to ensure the data recorded within the PensionGold Pension Administration database is accurate.

We would appreciate a follow-up report outlining the status of the aforementioned issues within sixty days.

Patrick Lane Chief Financial Officer SDCERS Audit Division

Cleópatra Jones-Patrick Internal Auditor SDCERS Audit Division

SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM STAFF REPORT

DATE:	September 1,	2004
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TO: Larry Grissom, Retirement Administrator Paul Barnett, Assistant Retirement Administrator

FROM: Patrick Lane, Chief Financial Officer Cleopatra Jones-Patrick, Internal Auditor

SUBJECT: Death Verification Review

We recently performed a review of those payees listed on the June 30, 2004 Pension Benefit Information (PBI) Death Verification Report. This report lists any payees having social security number matches to those deceased records maintained by the Social Security Administration (SSA). The purpose of this review is to ascertain whether the San Diego City Employees' Retirement System (SDCERS) is at risk of any payments being distributed on deceased member or survivor accounts.

Objectives, Scope and Approach

The general objectives of this review were as follows:

- To determine the benefit status of those newly matched SDCERS payees listed on the June 2004 PBI report
- To determine the number of over/underpayments of the newly matched SDCERS payees

To determine the number of over/under Corbett accruals of the newly matched SDCERS payees

Our Death Verification Review encompassed a review of all payees with an active or suspended benefit as of June 30, 2004. The review also included interviews of the SDCERS Operations Division Manager and staff.

Findings and Recommendations

All significant findings are included in this report for your consideration. The recommendations in this report represent, in our judgment, those most likely to bring about improvements in the operations of the organization and reduce any risk of financial loss suffered by the fund.

Significant Findings

- There were a total of 84 SDCERS payees matched in the June 2004 report.
- There were 14 newly matched SDCERS payees.
 - Of the 14, there was one active pension payee who was matched to a deceased individual.
 - This payee's benefit has been suspended.
- There were 70 SDCERS payees who have been previously reported.
- There was one additional active pension payee for whom the match report indicated an invalid social security number was submitted.
 - This condition was previously reported in the February 2004 Death Verification Review report.
- There were a total of 68 payees having benefits in suspended status as of June 30, 2004, of which, 61 have been in suspense since the last review report, submitted by the SDCERS Financial & Technical Services Division, May 21, 2004. Staff is currently researching outstanding issues related to these suspended benefits and terminating benefits as resolutions are reached.
- In addition to the 61 suspended members previously mentioned, there were 7 additional suspended pension payees reported as deceased by the SSA and respective State Departments of Vital Statistics. These 7 payees were suspended between February 2004 and June 2004 due to notice of death.
- There were a total of 16 payees having benefits in terminated status as of June 30, 2004, of which, 10 were in suspense and previously reported in the May 21, 2004 review report. Staff is currently researching outstanding issues related to these terminated payees and coordinating final payments or recoveries as appropriate.

Recommendations

- Obtain an accurate social security number for to ensure death verification matches are successful prospectively.
- Continue to review each Suspended Member, determine and execute the necessary steps to finalize the member.
- Determine the exact amount of any over or underpayments.
- Initiate collection efforts of any overpayments, including referral to the City Treasurer for collection, if necessary.
- Initiate payment of monies owed by coordinating with Auditor's Office Payroll staff.
- Refine procedures for future retiree members placed in suspense to ensure all suspended members are finalized in a timely manner.

The SDCERS Financial & Technical Services Division will continue to perform a Death Verification Review quarterly to ensure timely finalization of suspended members, to reduce occurrences of overpayments, and to ensure the data recorded within the PensionGold Pension Administration database is accurate.

We would appreciate a follow-up report outlining the status of the aforementioned issues within sixty days.

Patrick Lane

Chief Financial Officer

SDCERS

Financial & Technical Services Division

Cleopatra Jones Patrick

Internal Auditor

SDCERS ·

Financial & Technical Services Division

SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM STAFF REPORT

DATE:	December 22, 2004
TO:	Larry Grissom, Retirement Administrator Paul Barnett, Assistant Retirement Administrator
FROM:	Patrick Lane, Chief Financial Officer Cleopatra Jones-Patrick, Internal Auditor
SUBJECT:	Death Verification Review

We recently performed a review of those payees listed on the September 30, 2004 Pension Benefit Information (PBI) Death Verification Report. This report lists any payees having social security number matches to those deceased records maintained by the Social Security Administration (SSA). The purpose of this review is to ascertain whether the San Diego City Employees' Retirement System (SDCERS) is at risk of any payments being distributed on deceased member or survivor accounts.

Objectives, Scope and Approach

The general objectives of this review were as follows:

- To determine the benefit status of those newly matched SDCERS payees listed on the September 2004 PBI report
- To determine the number and estimated amount of over/underpayments of the newly matched SDCERS payees
- To determine the number and estimated amount of FY2002 2004 Corbett over/underpayments of the newly matched SDCERS payees.
- To determine the number and estimated amount of over/under FY2005 Corbett accruals of the newly matched SDCERS payees

Our Death Verification Review encompassed a review of all payees with an active or suspended benefit as of September 30, 2004.

Findings and Recommendations

All significant findings are included in this report for your consideration. The recommendations in this report represent, in our judgment, are those most likely to bring about improvements in the operations of the organization and reduce any risk of financial loss suffered by the fund.

Significant Findings

- There were a total of 74 SDCERS payees matched in the September 2004 report.
- There were 14 newly matched SDCERS payees.

- These payees' benefits have been suspended.
- There were 60 SDCERS payees who have been previously reported.
- There was one additional active pension payee for whom the match report indicated an invalid social security number was submitted.
 - This condition was previously reported in the February 2004 Death Verification Review report.
 - It has been determined that the payee has been using a tax identification number and this is deemed appropriate by our Operations and Legal Services Staff.
 - PBI does not perform matches on tax identification numbers; thus, this payee will surface on all subsequent matches.
- There were a total of 52 payees having benefits in suspended status as of June 30, 2004, of which, 49 have been in suspense since the last review report, submitted by the SDCERS Financial & Technical Services Division, September 1, 2004. Staff is currently researching outstanding issues related to these suspended benefits and terminating benefits as resolutions are reached.
- In addition to the 49 suspended members previously mentioned, there were 3
 additional suspended pension payees reported as deceased by the SSA and
 respective State Departments of Vital Statistics. These 3 payees were
 suspended between June 2004 and September 2004 due to notice of death.

[•] Of the 14, there were three active pension payees who were matched to deceased individuals.

There were a total of 18 payees having benefits in terminated status as of September 30, 2004, of which, 8 were in suspense and previously reported in the September 1, 2004 review report. Staff is currently researching outstanding issues related to these terminated payees and coordinating final payments or recoveries as appropriate.

Recommendations

- Continue to review each suspended member, determine and execute the necessary steps to finalize the member.
- Determine the exact amount of any over or underpayments.
- Initiate collection efforts of any overpayments, including referral to the City Treasurer for collection, if necessary.
- Initiate payment of monies owed by coordinating with Auditor's Office Payroll staff.
- Refine procedures for future retiree members placed in suspense to ensure all suspended members are finalized in a timely manner.

The SDCERS Financial & Technical Services Division will continue to perform a Death Verification Review quarterly to ensure timely finalization of suspended members, to reduce occurrences of overpayments, and to ensure the data recorded within the PensionGold Pension Administration database is accurate.

We would appreciate a follow-up report outlining the status of the aforementioned issues within sixty days.

Patrick Lane

Chief Financial Officer

SDCERS

Financial & Technical Services Division

Cleopatra Jones-Patrick

Internal Auditor

SDCERS

Financial & Technical Services Division

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