

Department of Health and Human Services

**OFFICE OF  
INSPECTOR GENERAL**

**PALMETTO GOVERNMENT BENEFITS  
ADMINISTRATOR, LLC, CLAIMED  
SOME UNALLOWABLE MEDICARE  
SUPPLEMENTAL EXECUTIVE  
RETIREMENT PLAN III COSTS  
THROUGH ITS  
INCURRED COST PROPOSALS**

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Amy J. Frontz  
Deputy Inspector General  
for Audit Services

August 2021  
A-07-21-00615

# *Office of Inspector General*

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The designation of financial or management practices as questionable, a recommendation for the disallowance of costs incurred or claimed, and any other conclusions and recommendations in this report represent the findings and opinions of OAS. Authorized officials of the HHS operating divisions will make final determination on these matters.

## Report in Brief

Date: August 2021

Report No. A-07-21-00615

U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES  
**OFFICE OF INSPECTOR GENERAL**



### Why OIG Did This Audit

The Centers for Medicare & Medicaid Services (CMS) reimburses Medicare contractors for a portion of their nonqualified plan costs.

The HHS, OIG, Office of Audit Services, Region VII pension audit team reviews the cost elements related to qualified defined-benefit, postretirement benefit, and any other pension-related cost elements claimed by Medicare contractors through Incurred Cost Proposals (ICPs).

Previous OIG audits found that Medicare contractors did not always correctly identify and claim nonqualified plan costs, including Supplemental Executive Retirement Plan (SERP) costs, for Medicare reimbursement.

Our objective was to determine whether the calendar years (CYs) 2015 and 2016 SERP III costs that Palmetto Government Benefits Administrator, LLC (Palmetto), claimed for Medicare reimbursement, and reported on its ICPs, were allowable and correctly claimed.

### How OIG Did This Audit

We reviewed \$66,738 of SERP III costs that Palmetto claimed for Medicare reimbursement on its ICPs for CYs 2015 and 2016.

## Palmetto Government Benefits Administrator, LLC, Claimed Some Unallowable Medicare Supplemental Executive Retirement Plan III Costs Through Its Incurred Cost Proposals

### What OIG Found

Palmetto claimed SERP III costs of \$66,738 for Medicare reimbursement, through its ICPs, for CYs 2015 and 2016; however, we determined that the allowable SERP III costs during this period were \$41,576. The difference, \$25,162, represented unallowable Medicare SERP III costs that Palmetto claimed on its ICPs for CYs 2015 through 2016. Palmetto claimed these unallowable Medicare SERP III costs primarily because it used incorrect indirect cost rates when claiming those costs for Medicare reimbursement.

### What OIG Recommends and Auditee Comments

We recommend that Palmetto work with CMS to ensure that its final settlement of contract costs reflects a decrease in Medicare SERP III costs of \$25,162 for CYs 2015 and 2016.

Palmetto did not directly refer to the monetary amount in our recommendation but did say that it would work with CMS to ensure that its final settlement of contract costs is appropriate.

Nothing in Palmetto's comments caused us to change our finding or recommendation. Thus, we continue to recommend that Palmetto work with CMS to ensure that its final settlement of contract costs reflects a decrease in Medicare SERP III costs of \$25,162 for CYs 2015 and 2016.

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## INTRODUCTION

### WHY WE DID THIS AUDIT

The Centers for Medicare & Medicaid Services (CMS) reimburses a portion of its contractors' nonqualified plan costs. In claiming nonqualified plan costs, contractors must follow cost reimbursement principles contained in the Federal Acquisition Regulation (FAR), the Cost Accounting Standards (CAS), and the Medicare contracts. Previous Office of Inspector General (OIG) audits found that Medicare contractors did not always correctly identify and claim nonqualified plan costs.

At CMS's request, the Department of Health and Human Services, OIG, 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 (MACs) and CAS- and FAR-covered contracts through Final Administrative Cost Proposals, Incurred Cost Proposals (ICPs), or both.

For this audit, we focused on one Medicare contractor, Palmetto Government Benefits Administrator, LLC (Palmetto). In particular, we examined the Supplemental Executive Retirement Plan III (SERP III) costs that Palmetto claimed for Medicare reimbursement, under the provisions of its MAC contracts and CAS- and FAR-covered contracts, and reported on its ICPs.

### OBJECTIVE

Our objective was to determine whether the calendar years (CYs) 2015 and 2016 SERP III costs that Palmetto claimed for Medicare reimbursement, and reported on its ICPs, were allowable and correctly claimed.

### BACKGROUND

#### **Palmetto Government Benefits Administrator, LLC, and Medicare**

During our audit period, Palmetto was a subsidiary of Blue Cross Blue Shield of South Carolina (BCBS South Carolina), whose home office is in Columbia, South Carolina. Palmetto administers Medicare operations under the MAC contracts for Medicare Parts A and B Jurisdiction 1<sup>1</sup> and

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<sup>1</sup> Medicare Parts A and B Jurisdiction 1 consisted of the States of California, Hawaii, and Nevada, and the U.S. Territories of American Samoa, Guam, and the Northern Mariana Islands.

Jurisdiction 11<sup>2</sup> effective October 25, 2007, and May 21, 2010, respectively, as well as other CAS-covered and FAR-covered contracts. Currently, Palmetto is the Medicare Parts A and B contractor for Jurisdictions J<sup>3</sup> and M (formerly Jurisdiction 11). Palmetto also continues to perform Railroad Retirement Board contract operations under a specialty MAC contract awarded on November 27, 2012.

During our audit period, CMS and BCBS South Carolina entered into an agreement called the “Advance Agreement on the Computation of Nonqualified Defined-Benefit Pension Plan Costs for Periods Beginning January 1, 2015” (agreement). This agreement allowed BCBS South Carolina to change its accounting methodology from a pay-as-you-go to an accrual method. This agreement also closed costs prior to January 1, 2015. Starting with January 1, 2015, the SERP III plan would, under the terms of the agreement, identify its segments by individual participant. These segments allocate to each of BCBS South Carolina’s Medicare subsidiaries: Palmetto; Companion Data Services, LLC; and CGS Administrators, LLC. This report addresses Palmetto’s compliance with the provisions of the Federal requirements and its Medicare contracts in claiming SERP III costs.

The disclosure statement that Palmetto submits to CMS states that Palmetto uses pooled cost accounting. Medicare contractors use pooled cost accounting to calculate the indirect cost rates (whose computations include pension, postretirement benefit, SERP III, and Excess Plan costs) that they submit on their ICPs. Medicare contractors use the indirect cost rates to calculate the contract costs that they report on their ICPs. In turn, CMS uses these indirect cost rates in determining the final indirect cost rates for each contract.<sup>4</sup>

### **Supplemental Executive Retirement Plan III**

BCBS South Carolina sponsors a SERP III plan. The purpose of this deferred compensation plan is to supplement participants’ benefits payable under BCBS South Carolina’s retirement plans. This plan is provided to a limited group of management employees who are responsible for earnings and long-term growth of the company. BCBS South Carolina allocated costs to the Palmetto Medicare segment.

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<sup>2</sup> Medicare Parts A and B Jurisdiction 11 consisted of the States of North Carolina, South Carolina, Virginia, and West Virginia (but excluded Part B for the counties of Arlington and Fairfax in Virginia and the city of Alexandria in Virginia). Jurisdiction 11 also included home health and hospice services provided in the States of Alabama, Arkansas, Florida, Georgia, Illinois, Indiana, Kentucky, Louisiana, Mississippi, New Mexico, North Carolina, Ohio, Oklahoma, South Carolina, Tennessee, and Texas. Service areas for Jurisdiction M (mentioned in the next sentence of this section) are the same as those for Jurisdiction 11.

<sup>3</sup> Medicare Parts A and B Jurisdiction J consists of the states of Alabama, Georgia, and Tennessee.

<sup>4</sup> For each CY, each Medicare contractor submits to CMS an ICP that 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.

## Accounting Methodologies

The Medicare contracts require Palmetto to calculate the SERP III plan costs in accordance with the FAR and CAS 412 and 413. The FAR and the CAS require that the costs for nonqualified plans be measured under either the accrual method or the pay-as-you-go method. Under the accrual method, the allowable costs are based on the annual contributions that the employer deposits into its trust fund. For nonqualified plans that are not funded through the use of a funding agency, costs are to be accounted for under the pay-as-you-go method. This method is based on the actual benefits paid to participants, which are comprised of lump-sum payments and annuity payments. Palmetto claimed SERP III plan costs on an accrual basis.

## Incurring Cost Proposal Audits

At CMS's request, the Defense Contract Audit Agency (DCAA) and CliftonLarsonAllen, LLP (Allen), performed audits of the ICPs that Palmetto submitted for CYs 2015 and 2016. The objectives of these ICP audits were to determine whether costs were allowable in accordance with applicable Federal regulations.

For our current audit, we relied on the DCAA and Allen ICP audit findings and recommendations when computing the allowable SERP III plan costs discussed in this report.

We incorporated the results of the DCAA and Allen ICP audits into our computations of the audited indirect cost rates, and ultimately the SERP III plan costs claimed, for the contracts subject to the FAR. CMS will use our report on allowable SERP III plan costs, as well as the DCAA and Allen ICP audit reports, to determine the final indirect cost rates and the total allowable contract costs for Palmetto for CYs 2015 and 2016. 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.<sup>5</sup>

## HOW WE CONDUCTED THIS AUDIT

We reviewed \$66,738 of SERP III costs claimed by Palmetto for Medicare reimbursement on its ICPs for CYs 2015 and 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.

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<sup>5</sup> In accordance with FAR 42.705-1(b)(5)(ii) and FAR 42.705-1(b)(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.

Appendix A contains details of our audit scope and methodology.

## FINDING

Palmetto claimed SERP III costs of \$66,738 for Medicare reimbursement, through its ICPs, for CYs 2015 and 2016; however, we determined that the allowable SERP III costs during this period were \$41,576.<sup>6</sup> The difference, \$25,162, represented unallowable Medicare SERP III costs that Palmetto claimed on its ICPs for CYs 2015 and 2016. Palmetto claimed these unallowable Medicare SERP III costs primarily because it used incorrect indirect cost rates when claiming those costs for Medicare reimbursement.

### ALLOCABLE MEDICARE SUPPLEMENTAL EXECUTIVE RETIREMENT PLAN III COSTS UNDERSTATED

During this audit, we calculated the allocable SERP III Medicare costs for CYs 2015 and 2016 in accordance with Federal requirements. We determined that the allocable SERP III Medicare costs for CYs 2015 and 2016 totaled \$558,826. Palmetto reported that its allocable SERP III Medicare costs, as identified in its actuarial calculations, totaled \$557,048. Therefore, Palmetto understated the allocable SERP III Medicare costs by \$1,778. This understatement occurred because of differences in the assignable pension costs. More specifically, the differences in the calculation of the amortization caused the differences in the assignable pension costs.

Table 1 below shows the differences between the allocable SERP III Medicare costs that we determined for CYs 2015 and 2016 and the allocable SERP III Medicare costs that Palmetto calculated for the same time period.

**Table 1: Allocable SERP III Medicare Costs**

| <b>CY</b>    | <b>Allocable Per Audit</b> | <b>Per Palmetto</b> | <b>Difference</b> |
|--------------|----------------------------|---------------------|-------------------|
| 2015         | \$286,687                  | \$286,687           | \$0               |
| 2016         | 272,139                    | 270,361             | 1,778             |
| <b>Total</b> | <b>\$558,826</b>           | <b>\$557,048</b>    | <b>\$1,778</b>    |

### CALCULATION OF ALLOWABLE SUPPLEMENTAL EXECUTIVE RETIREMENT PLAN III COSTS

We used the allocable SERP III Medicare costs (Appendix C) to adjust the indirect cost rates (i.e., the fringe benefit and general and administrative rates) to determine the allowable SERP III costs for Medicare reimbursement for CYs 2015 and 2016.

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<sup>6</sup> These claimed and allowable SERP III costs were associated with the cost reimbursement and variable time and material portions of the contracts.

Palmetto claimed Medicare SERP III costs of \$66,738 on its ICPs for CYs 2015 and 2016. After incorporating the results of the DCAA and Allen ICP audits and our adjustments to the indirect cost rates, we determined that the allowable Medicare SERP III costs for CYs 2015 and 2016 were \$41,576. Thus, Palmetto claimed \$25,162 of unallowable Medicare SERP III costs on its ICPs for CYs 2015 and 2016. Palmetto claimed these unallowable Medicare SERP III costs primarily because it used incorrect indirect cost rates when claiming those costs for Medicare reimbursement.

We calculated the Medicare SERP III costs based on separately computed CAS-based costs in accordance with CAS 412 and 413. For details on the Federal requirements, see Appendix B.

Table 2 below compares the Medicare SERP III costs that we calculated (using our adjusted indirect cost rates) to the SERP III costs that Palmetto claimed for Medicare reimbursement for CYs 2015 and 2016.

**Table 2: Comparison of Allowable SERP III Costs and Claimed SERP III Costs<sup>7</sup>**

| <b>CY</b>    | <b>Allowable Per Audit</b> | <b>Per Palmetto</b> | <b>Difference</b> |
|--------------|----------------------------|---------------------|-------------------|
| 2015         | \$2,426                    | \$20,380            | (\$17,954)        |
| 2016         | 39,150                     | 46,358              | (7,208)           |
| <b>Total</b> | <b>\$41,576</b>            | <b>\$66,738</b>     | <b>(\$25,162)</b> |

### **RECOMMENDATION**

We recommend that Palmetto Government Benefits Administrator, LLC, work with CMS to ensure that its final settlement of contract costs reflects a decrease in Medicare SERP III costs of \$25,162 for CYs 2015 and 2016.

### **AUDITEE COMMENTS AND OFFICE OF INSPECTOR GENERAL RESPONSE**

In written comments on our draft report, Palmetto did not directly refer to the monetary amount in our recommendation but did say that it would work with CMS to ensure that its final settlement of contract costs is appropriate. Palmetto’s comments appear in their entirety as Appendix D.<sup>8</sup>

<sup>7</sup> Our calculation of allowable costs does not appear in this report because those rate computations that Palmetto used in its ICPs, and to which we referred as part of our audit, are proprietary information.

<sup>8</sup> Although BCBS South Carolina, of which Palmetto is a subsidiary, provided written comments on this draft report, for consistency we associate these comments with Palmetto.

Nothing in Palmetto's comments caused us to change our finding or recommendation. Thus, we continue to recommend that Palmetto work with CMS to ensure that its final settlement of contract costs reflects a decrease in Medicare SERP III costs of \$25,162 for CYs 2015 and 2016.

## APPENDIX A: AUDIT SCOPE AND METHODOLOGY

### SCOPE

We reviewed \$66,738 of SERP III costs claimed by Palmetto for Medicare reimbursement on its ICPs for CYs 2015 and 2016.

Achieving our objective did not require that we review Palmetto's overall internal control structure. We reviewed the internal controls related to the SERP III costs claimed for Medicare reimbursement to ensure that those costs were allocable in accordance with the CAS and allowable in accordance with the FAR.

We performed fieldwork at BCBS South Carolina and Palmetto located in Columbia, South Carolina.

### METHODOLOGY

To accomplish our objective, we:

- reviewed the portions of the FAR, CAS, and Medicare contracts applicable to this audit;
- reviewed information provided by Palmetto to identify the amounts of SERP III costs used in Palmetto's calculation of indirect cost rates for CYs 2015 and 2016;
- used information that Palmetto's actuarial consulting firm provided, including information on the SERP III plan's assets, liabilities, normal costs, contributions, benefit payments, investment earnings, and administrative expenses;
- examined Palmetto's accounting records, SERP III plan documents, and annual actuarial valuation reports;
- determined the extent to which Palmetto funded CAS-based SERP III plan costs with contributions to the trust and accumulated prepayment credits;
- reviewed the results of the DCAA and Allen ICP audits and incorporated those results into our calculations of allowable SERP III costs;
- engaged the CMS Office of the Actuary, which provides technical actuarial advice, to calculate the allocable SERP III Medicare costs based on the CAS (the calculations were based on separately computed CAS-based pension costs for the SERP III Medicare segment and the Other segment);

- reviewed and verified the CMS actuaries' methodology and calculations and used this information to calculate the SERP III plan costs for the Palmetto Medicare segment for CYs 2015 and 2016; and
- provided the results of our audit to Palmetto officials on April 2, 2021.

We performed this audit in conjunction with the following audits and used the information obtained during those audits:

- *Palmetto Government Benefits Administrator, LLC, Did Not Claim Some Allowable Medicare Pension Costs Through Its Incurred Cost Proposals (A-07-20-00592);*
- *Palmetto Government Benefits Administrator, LLC, Claimed Some Unallowable Medicare Postretirement Benefit Costs Through Its Incurred Cost Proposals (A-07-21-00614); and*
- *Palmetto Government Benefits Administrator, LLC, Claimed Some Unallowable Excess Plan Costs Through Its Incurred Cost Proposals (A-07-21-00616).*

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 objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective.

## **APPENDIX B: FEDERAL REQUIREMENTS RELATED TO REIMBURSEMENT OF SUPPLEMENTAL EXECUTIVE RETIREMENT PLAN COSTS**

### **FEDERAL REGULATIONS**

Federal regulations (FAR 31.205-6(j)) require Medicare contractors to measure, assign, and allocate the costs of all defined-benefit pension plans in accordance with CAS 412 and 413.

Federal regulations (FAR 52.216-7(a)(1)) address the invoicing requirements and the allowability of payments as determined by the Contracting Officer in accordance with FAR subpart 31.2.

Federal regulations (CAS 412) (as amended) address the determination and measurement of pension cost components. These regulations also address 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 Palmetto to submit invoices in accordance with FAR 52.216-7, "Allowable Cost & Payment." (See our citation to FAR 52.216-7(a)(1) in "Federal Regulations" above.)

**APPENDIX C: ALLOCABLE SUPPLEMENTAL EXECUTIVE RETIREMENT PLAN III COSTS  
FOR PALMETTO GOVERNMENT BENEFITS ADMINISTRATOR, LLC,  
FOR CALENDAR YEARS 2015 AND 2016**

| Date            | Description                 |            | Total Company | "Other" Segment | Medicare  |
|-----------------|-----------------------------|------------|---------------|-----------------|-----------|
| 2015            | Contributions               | <u>1/</u>  | \$7,264,000   | \$7,264,000     | \$0       |
|                 | Discount for Interest       | <u>2/</u>  | (\$339,315)   | (\$339,315)     | \$0       |
| January 1, 2015 | Present Value Contributions | <u>3/</u>  | \$6,924,685   | \$6,924,685     | \$0       |
|                 | Prepayment Credit Applied   | <u>4/</u>  | \$938,380     | \$651,693       | \$286,687 |
|                 | Present Value of Funding    | <u>5/</u>  | \$7,863,065   | \$7,576,378     | \$286,687 |
| January 1, 2015 | CAS Funding Target          | <u>6/</u>  | \$938,380     | \$651,693       | \$286,687 |
|                 | Percentage Funded           | <u>7/</u>  |               | 100.00%         | 100.00%   |
|                 | Funded Pension Cost         | <u>8/</u>  |               | \$651,693       | \$286,687 |
|                 | Allowable Interest          | <u>9/</u>  |               | \$0             | \$0       |
| 2015            | Allocable Pension Cost      | <u>10/</u> |               | \$651,693       | \$286,687 |

| Date            | Description                 |  | Total Company | "Other" Segment | Medicare  |
|-----------------|-----------------------------|--|---------------|-----------------|-----------|
| 2016            | Contributions               |  | \$6,336,017   | \$5,826,443     | \$509,574 |
|                 | Discount for Interest       |  | (\$294)       | (\$270)         | (\$24)    |
| January 1, 2016 | Present Value Contributions |  | \$6,335,723   | \$5,826,173     | \$509,550 |
|                 | Prepayment Credit Applied   |  | \$911,927     | \$639,788       | \$272,139 |
|                 | Present Value of Funding    |  | \$7,247,650   | \$6,465,961     | \$781,689 |
| January 1, 2016 | CAS Funding Target          |  | \$911,927     | \$639,788       | \$272,139 |
|                 | Percentage Funded           |  |               | 100.00%         | 100.00%   |
|                 | Funded Pension Cost         |  |               | \$639,788       | \$272,139 |
|                 | Allowable Interest          |  |               | \$0             | \$0       |
| 2016            | Allocable Pension Cost      |  |               | \$639,788       | \$272,139 |

**ENDNOTES**

1/ We obtained these Total Company contribution amounts from actuarial valuation reports. These contributions include deposits made during the CY. We determined the contributions allocated to Medicare during the SERP III segmentation review (A-07-20-00600). The amounts shown for the Other segment represent the difference between the Total Company and Medicare. The Medicare portion is made up of eligible participants, for which BCBS South Carolina allocated costs to the Medicare segments (Palmetto, CDS, and CGS).

2/ We subtracted the interest that was included in the contributions deposited after the beginning of the valuation year to discount the contributions back to their beginning-of-the-year value. For purposes of this Appendix, we computed the interest as the difference between the present value of contributions (at the CAS valuation interest rate) and actual contribution amounts.

3/ The present value of contributions is the value of the contributions discounted from the date of deposit back to the first day of the CY.

4/ A prepayment credit represents the accumulated value of premature funding from the previous year(s). A prepayment credit is created when contributions, plus interest, exceed the end-of-year CAS funding target. A prepayment credit is carried forward, with interest, to fund future CAS pension costs.

- 5/ The present value of funding represents the present value of contributions plus prepayment credits. This is the amount of funding that is available to cover the CAS funding target measured at the first day of the CY.
- 6/ The CAS funding target must be funded by contributions made during the current accounting period or prepaid contributions to satisfy the funding requirement of the FAR 31.205-6(j)(2)(i).
- 7/ The percentage of costs funded is a measure of the portion of the CAS funding target that was funded during the CY. Because any funding in excess of the CAS funding target is accounted for as a prepayment in accordance with CAS 412.50(c)(1), the funded ratio may not exceed 100 percent. We computed the percentage funded as the present value of funding divided by the CAS funding target. For purposes of illustration, the percentage of funding has been rounded to four decimal places.
- 8/ We computed the funded CAS-based pension cost as the CAS funding target multiplied by the percent funded.
- 9/ We assumed that interest on the funded CAS-based pension cost, less the prepayment credit, accrues in the same proportion as the interest on contributions bears to the present value of contributions. However, we limited the interest in accordance with FAR 31.205-6(j)(2)(iii), which does not permit the allowable interest to exceed the interest that would accrue if the CAS funding target, less the prepayment credit, were funded in four equal installments deposited within 30 days after the end of the quarter.
- 10/ The allocable CAS pension cost is the amount of pension cost that may be allocated for contract cost purposes.



July 16, 2021

BlueCross BlueShield of South Carolina  
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Patrick J. Cogley  
Regional Inspector General for Audit Services  
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Report Numbers:

A-07-20-00592

A-07-20-00593

A-07-20-00594

A-07-21-00608

A-07-21-00609

A-07-21-00610

A-07-21-00611

A-07-21-00612

A-07-21-00613

A-07-21-00614

A-07-21-00615

A-07-21-00616

Dear Mr. Cogley:

We are in receipt of the draft reports referenced above.

As recommended in each report, we will work with CMS to ensure costs are appropriate upon final settlement of the Incurred Cost Proposal reports.

Sincerely,

/Lori Hair/

Lori Hair  
Vice President, Controller and Assistant Treasurer  
Blue Cross and Blue Shield of South Carolina

Cc: Bruce Hughes, Celerian Group  
Michael Mizeur, Chief Financial Officer