



MICHIGAN

OFFICE OF THE AUDITOR GENERAL



THOMAS H. MCTAVISH, C.P.A.
AUDITOR GENERAL

The auditor general shall conduct post audits of financial transactions and accounts of the state and of all branches, departments, offices, boards, commissions, agencies, authorities and institutions of the state established by this constitution or by law, and performance post audits thereof.

– Article IV, Section 53 of the Michigan Constitution

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Michigan
Office of the Auditor General
REPORT SUMMARY

Management Letter

Michigan Public School Employees' Retirement System

October 1, 2009 through September 30, 2011

Report Number:
071-0152-12M

Released:
April 2012

The management letter is used to report significant deficiencies in internal control over financial reporting and other matters that come to the auditor's attention during the completion of the financial audit conducted in accordance with generally accepted government auditing standards. This management letter is being issued in conjunction with our financial audit of the Michigan Public School Employees' Retirement System (MPSERS).

Financial Statements:

Auditor's Report Issued

We have audited MPSERS's basic financial statements as of and for the fiscal years ended September 30, 2011 and September 30, 2010 and have issued a separate report thereon dated January 19, 2012. We issued an unqualified opinion on MPSERS's financial statements.

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Internal Control Over Financial Reporting

We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses. However, we did identify a significant deficiency (Finding 1).

The Office of Retirement Services (ORS) and Financial Services, within the Department of Technology, Management, and Budget (DTMB), did not have sufficient controls to ensure that they properly recorded MPSERS's financial activity (Finding 1).

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Noncompliance and Other Matters Material to the Financial Statements

We did not identify any instances of noncompliance or other matters applicable to the financial statements that are required to be reported under *Government Auditing Standards*.

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Agency Response:

Our management letter includes 1 finding and 1 corresponding recommendation. DTMB's preliminary response indicates that it agrees with the recommendation.

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Background:

MPSERS is a cost-sharing, multiple employer, Statewide, defined benefit public employee retirement plan governed by the State and operating under the provisions of Act 300, P.A. 1980, as amended. MPSERS's pension plan was established by the State to provide retirement, survivor, and disability benefits to public school employees. In addition, MPSERS's other

postemployment benefits (OPEB) plan provides all retirees with the option of receiving health, dental, and vision coverage under the Michigan Public School Employees' Retirement Act. There are 714 participating employers. By statute, employees of K-12 public school districts, public school academies, district libraries, tax-supported community colleges, and seven universities may be members.

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A copy of the full report can be obtained by calling 517.334.8050 or by visiting our Web site at: <http://audgen.michigan.gov>



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201 N. Washington Square
Lansing, Michigan 48913

Thomas H. McTavish, C.P.A.
Auditor General

Scott M. Strong, C.P.A., C.I.A.
Deputy Auditor General



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THOMAS H. MCTAVISH, C.P.A.
AUDITOR GENERAL

April 3, 2012

Ms. Diana Osborn, Chair
Michigan Public School Employees' Retirement System Board
General Office Building
and
John E. Nixon, C.P.A., Director
Department of Technology, Management, and Budget
George W. Romney Building
and
Mr. Phillip J. Stoddard, Director
Office of Retirement Services
Department of Technology, Management, and Budget
General Office Building
Lansing, Michigan

Dear Ms. Osborn, Mr. Nixon, and Mr. Stoddard:

We have audited the basic financial statements of the Michigan Public School Employees' Retirement System (MPERS) as of and for the fiscal years ended September 30, 2011 and September 30, 2010 and have issued a separate report thereon dated January 19, 2012. In planning and performing our audit of the financial statements of MPERS, we considered MPERS's internal control over financial reporting and compliance and other matters. This is our management letter on the internal control over financial reporting and on compliance and other matters of the Michigan Public School Employees' Retirement System for the period October 1, 2009 through September 30, 2011.

This management letter contains our report summary; independent auditor's report on internal control over financial reporting and on compliance and other matters; finding, recommendation, and agency preliminary response; and a glossary of acronyms and terms.

The agency preliminary response was taken from the agency's response subsequent to our audit fieldwork. The *Michigan Compiled Laws* and administrative procedures require that the audited agency develop a plan to comply with the audit recommendation and submit it within 60 days after release of the audit report to the Office of Internal Audit Services, State Budget Office. Within 30 days of receipt, the Office of Internal Audit Services is required to review the plan and either accept the plan as final or contact the agency to take additional steps to finalize the plan.

We appreciate the courtesy and cooperation extended to us during this audit.

Sincerely,

A handwritten signature in black ink that reads "Thomas H. McTavish".

Thomas H. McTavish, C.P.A.
Auditor General

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INDEPENDENT AUDITOR'S REPORT ON
INTERNAL CONTROL AND COMPLIANCE



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THOMAS H. MCTAVISH, C.P.A.
AUDITOR GENERAL

Independent Auditor's Report on Internal Control Over
Financial Reporting and on Compliance and Other Matters

Ms. Diana Osborn, Chair
Michigan Public School Employees' Retirement System Board
General Office Building
and
John E. Nixon, C.P.A., Director
Department of Technology, Management, and Budget
George W. Romney Building
and
Mr. Phillip J. Stoddard, Director
Office of Retirement Services
Department of Technology, Management, and Budget
General Office Building
Lansing, Michigan

Dear Ms. Osborn, Mr. Nixon, and Mr. Stoddard:

We have audited the basic financial statements of the Michigan Public School Employees' Retirement System as of and for the fiscal years ended September 30, 2011 and September 30, 2010 and have issued our report thereon dated January 19, 2012. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States.

Internal Control Over Financial Reporting

Management of the Michigan Public School Employees' Retirement System is responsible for establishing and maintaining effective internal control over financial reporting. In planning and performing our audit, we considered the Michigan Public School Employees' Retirement System's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Michigan Public School Employees' Retirement System's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Michigan Public School Employees' Retirement System's internal control over financial reporting.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis.

Our consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be deficiencies, significant deficiencies, or material weaknesses. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses, as defined in the preceding paragraph. However, we identified a deficiency in internal control over financial reporting, as described in Finding 1, that we consider to be a significant deficiency in internal control over financial reporting. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Michigan Public School Employees' Retirement System's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

The agency preliminary response to the finding identified in our audit is included in the body of our management letter. We did not audit the agency preliminary response and, accordingly, we express no opinion on it.

This report is intended solely for the information and use of the Governor, the Legislature, the Michigan Public School Employees' Retirement System Board, management, and others within the Department of Technology, Management, and Budget and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and its distribution is not limited.

Sincerely,



Thomas H. McTavish, C.P.A.
Auditor General
January 19, 2012

**FINDING, RECOMMENDATION, AND
AGENCY PRELIMINARY RESPONSE**

FINDING

1. Controls Over Financial Reporting

The Office of Retirement Services (ORS) and Financial Services, within the Department of Technology, Management, and Budget (DTMB), did not have sufficient controls to ensure that they properly recorded the Michigan Public School Employees' Retirement System's (MPERS's) financial activity. As a result, they could not ensure the accuracy of MPERS's financial statements as evidenced by several financial statement errors.

Governmental Accounting Standards Board* (GASB) Statement No. 25, paragraph 21, requires pension plans to report the plan assets by major category of assets, such as receivables and investments, and then by principal components of those assets. In addition, GASB Statement No. 43, paragraph 19, requires the same reporting for other postemployment benefits (OPEB) plans. Therefore, it is important that amounts due from different sources are properly recorded. Our review disclosed:

- a. ORS and Financial Services did not record the receivables related to the Early Retiree Reinsurance Program for fiscal year 2010-11 claims submitted for reimbursement. As a result, amounts due from federal agencies, other governmental contributions, and net assets were understated by \$45.7 million in the OPEB plan as of September 30, 2011. Prior to publishing MPERS's *Comprehensive Annual Financial Report (CAFR)*, ORS and Financial Services corrected the accounting records and made the appropriate revision to MPERS's *CAFR*.
- b. Financial Services did not properly allocate a portion of its estimate of amounts due from employer to MPERS's OPEB plan. As a result, the amounts due from employer in the pension plan were overstated and the amounts due from employer in the OPEB plan were understated by \$32.0 million. Financial Services estimated the amounts due from employer for each plan based on the plan's net asset balance. This estimate did not take into account the 3% withheld from each public school employee's salary due to MPERS's OPEB plan as of September 30, 2011.

* See glossary at end of report for definition.

Prior to publishing MPERS's *CAFR*, ORS and Financial Services adjusted the accounting records by reducing the amounts due from employer in the pension plan by \$32.0 million. However, because of an accounting error, ORS and Financial Services increased the amounts due from employer in the OPEB plan by only \$23.5 million, rather than the full \$32.0 million. As a result, the amounts due from employer and net assets in the OPEB plan were understated by \$8.5 million.

- c. Financial Services did not properly estimate the amounts due from employers at September 30, 2011. As a result, the amounts due from employer were understated and deferred revenue was understated by \$19.8 million of the \$58.9 million of cash received but not allocated at September 30, 2011.

Generally accepted accounting principles do not allow assets and liabilities to be offset on the statement of net assets unless the entity has the right and intention to offset the asset and liability with the same reporting unit. Financial Services' estimate for the amounts due from employers at September 30, 2011 offsets cash received but not yet allocated totaling \$58.9 million with the total estimated amount due from all reporting units. Its estimate does not account for the reporting units that have paid more than the amount they owe, which should be treated as deferred revenue as the amounts cannot be offset with the amounts owed by other reporting units. Subsequent to our review, it determined that \$19.8 million of the \$58.9 million should have been recorded as deferred revenue.

RECOMMENDATION

We recommend that ORS and Financial Services, within DTMB, implement sufficient controls to ensure that they properly record MPERS's financial activity.

AGENCY PRELIMINARY RESPONSE

DTMB agrees with the recommendation but notes that the misclassifications were partially corrected in the State's accounting records and that the published financial statements were materially accurate. Financial Services will, however, revise existing financial statement preparation and review processes to enhance existing controls for calculating and recording activity related to programs and incentives. Financial Services will update relevant procedures as needed by August 30, 2012.

GLOSSARY

Glossary of Acronyms and Terms

<i>CAFR</i>	<i>Comprehensive Annual Financial Report.</i>
deficiency in internal control over financial reporting	The design or operation of a control that does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis.
DTMB	Department of Technology, Management, and Budget.
financial audit	An audit that is designed to provide reasonable assurance about whether the financial schedules and/or financial statements of an audited entity are presented fairly in all material respects in conformity with the disclosed basis of accounting.
Governmental Accounting Standards Board (GASB)	An arm of the Financial Accounting Foundation established to promulgate standards of financial accounting and reporting with respect to activities and transactions of state and local governmental entities.
internal control	A process, effected by those charged with governance, management, and other personnel, designed to provide reasonable assurance about the achievement of the entity's objectives with regard to the reliability of financial reporting, effectiveness and efficiency of operations, and compliance with applicable laws and regulations.
material misstatement	A misstatement in the financial schedules and/or financial statements that causes the schedules and/or statements to not present fairly the financial position or the changes in financial position or cash flows in conformity with the disclosed basis of accounting.

material weakness in internal control over financial reporting	A deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the financial schedules and/or financial statements will not be prevented, or detected and corrected, on a timely basis.
MPSERS	Michigan Public School Employees' Retirement System.
OPEB	other postemployment benefits.
ORS	Office of Retirement Services.
significant deficiency in internal control over financial reporting	A deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.
unqualified opinion	An auditor's opinion in which the auditor states that the financial schedules and/or financial statements presenting the basic financial information of the audited agency are fairly presented in conformity with the disclosed basis of accounting.

