



DEPARTMENT OF HEALTH & HUMAN SERVICES

OFFICE OF INSPECTOR GENERAL

Office of Audit Services
Region I
John F. Kennedy Federal Building
Boston, MA 02203
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March 17, 2009

Report Number: A-01-08-00608

Mr. William Dowd
Senior Vice President
National Grid USA Service Company, Inc.
52 Second Avenue
Waltham, Massachusetts 02451

Dear Mr. Dowd:

Enclosed is the U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG), final report entitled "Review of Retiree Drug Subsidy Costs Reported by National Grid USA Service Company, Inc., for Plan Years 2006 and 2007." We will forward a copy of this report to the HHS action official noted below.

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, OIG reports generally are made available to the public to the extent that information in the report is not subject to exemptions in the Act. Accordingly, this report will be posted on the Internet at <http://oig.hhs.gov>.

If you have any questions or comments about this report, please direct them to the HHS action official. Please refer to report number A-01-08-00608 in all correspondence.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Armstrong".

Michael J. Armstrong
Regional Inspector General
for Audit Services

Enclosure

HHS Action Official:

Nanette Foster Reilly, Consortium Administrator
Consortium for Financial Management and Fee for Service Operations
Centers for Medicare & Medicaid Services
601 E. 12th Street, Room 235
Kansas City, Missouri 64106

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**REVIEW OF RETIREE DRUG
SUBSIDY COSTS REPORTED BY
NATIONAL GRID USA SERVICE
COMPANY, INC., FOR
PLAN YEARS 2006 AND 2007**



Daniel R. Levinson
Inspector General

March 2009
A-01-08-00608

Office of Inspector General

<http://oig.hhs.gov>

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Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, Office of Inspector General reports generally are made available to the public to the extent that information in the report is not subject to exemptions in the Act.

OFFICE OF AUDIT SERVICES FINDINGS AND OPINIONS

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.

EXECUTIVE SUMMARY

BACKGROUND

Section 101 of the Medicare Prescription Drug, Improvement, and Modernization Act of 2003 (Public Law 108-173) established a Retiree Drug Subsidy program effective January 1, 2006. Under the program, the Centers for Medicare & Medicaid Services (CMS) makes subsidy payments to sponsors (employers and unions) of qualified retiree prescription drug plans for each qualifying covered retiree under the plan.

A qualifying covered retiree is a Part D eligible individual who is not enrolled in a Part D plan but who is covered by a qualified retiree prescription drug plan. The subsidy payments for each qualifying covered retiree generally equal 28 percent of allowable retiree costs that are incurred within the effective and termination dates of both the retiree's plan (coverage dates) and the subsidy period approved by CMS (subsidy dates).

National Grid USA Service Company, Inc. (National Grid), offers prescription drug coverage to its retired employees through 29 plans covered by 7 insurers. The 17 plans insured by Blue Cross Blue Shield of Massachusetts (BCBSMA) were the subject of our review. National Grid received approximately \$5.8 million in plan year 2006 subsidy payments and \$5.9 million in plan year 2007 interim subsidy payments for costs reported under its BCBSMA prescription drug plans.

OBJECTIVE

Our objective was to determine whether National Grid's reported drug costs under its BCBSMA prescription drug plans were incurred within each qualifying covered retiree's coverage and subsidy dates.

SUMMARY OF FINDINGS

For plan years 2006 and 2007, National Grid had correctly reported drug costs that were incurred under its BCBSMA prescription drug plans within each qualifying covered retiree's coverage and subsidy dates. Accordingly, this report contains no recommendations.

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INTRODUCTION

BACKGROUND

Retiree Drug Subsidy Program

Section 101 of the Medicare Prescription Drug, Improvement, and Modernization Act of 2003 (Public Law 108-173) established a Retiree Drug Subsidy (RDS) program effective January 1, 2006. Under the program, the Centers for Medicare & Medicaid Services (CMS) makes subsidy payments to sponsors (employers and unions) of qualified retiree prescription drug plans for each qualifying retiree covered under the plan. A qualifying covered retiree is a Part D eligible individual who is not enrolled in a Part D plan but who is covered by a qualified retiree prescription drug plan. The subsidy payments for each qualifying covered retiree generally equal 28 percent of allowable retiree drug costs.

Retiree Lists and Response Files

Medicare requires that the sponsor of a qualified retiree prescription drug plan submit an RDS program application with a list of qualifying covered retirees to CMS each year.¹ The submitted list should include retiree identification information as well as the dates that the plan sponsor provided the retiree with coverage under the plan. These dates are referred to as the coverage effective and termination dates (coverage dates).

To determine whether a submitted retiree is a Part D eligible individual who is not enrolled in a Part D plan, CMS queries the Medicare Beneficiary Database. CMS uses the results of this query to determine the periods of time during the plan year when the retiree is eligible for the subsidy. CMS includes the subsidy effective and termination dates (subsidy dates) in the retiree response file that it returns to the plan sponsor.

Reporting Retiree Drug Costs

Plan sponsors, or their vendors, must accumulate individual retiree drug costs and prepare and submit aggregated cost reports to CMS before requesting subsidy payments.² Costs should only be reported if they are incurred within both the retiree's coverage and subsidy dates.

¹CMS also recommends that plan sponsors submit updated retiree lists on a periodic basis to reflect changes to previously reported retiree information and to report new retiree information.

²Plan sponsors can elect to receive interim subsidy payments based on costs reported to date. A plan sponsor receiving interim payments is required to reconcile interim payments within 15 months after the end of its plan year. CMS will make any necessary adjustments to interim payments for the plan year when the reconciliation is completed.

National Grid USA Service Company, Inc.

National Grid USA Service Company, Inc. (National Grid), offers prescription drug coverage to its retired employees through 29 qualified retiree prescription drug plans covered by 7 insurers. The 17 plans insured by Blue Cross Blue Shield of Massachusetts (BCBSMA) were the subject of our review. During plan years 2006 and 2007, National Grid used outside vendors to accumulate retiree drug costs and prepare cost reports but submitted its own RDS cost reports directly to CMS using four RDS applications for each plan year. For all 17 qualified retiree prescription drug plans insured by BCBSMA, National Grid received approximately \$5.8 million in plan year 2006 subsidy payments and \$5.9 million in plan year 2007 interim subsidy payments.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

Our objective was to determine whether National Grid's reported drug costs under its BCBSMA prescription drug plans were incurred within each qualifying covered retiree's coverage and subsidy dates.

Scope

We reviewed National Grid's BCBSMA prescription drug plan year 2006 covered retiree lists and plan year 2007 retiree response and notification files, as well as plan year 2006 reconciliation cost reports and plan year 2007 interim cost reports that National Grid submitted to CMS in March 2008.

We limited our review of National Grid's internal controls to those applicable to reporting drug costs for qualifying covered retirees within valid coverage and subsidy periods because our objective did not require an understanding or assessment of all internal controls over the reporting of drug costs.

We performed our audit work from June through September 2008.

Methodology

To accomplish our objective, we:

- reviewed applicable laws, regulations, and Medicare program guidance;
- reviewed the plan year 2006 covered retiree lists and the plan year 2007 retiree response and notification files to determine retiree subsidy dates;
- reviewed detailed drug costs supporting the plan year 2006 reconciliation cost reports and the plan year 2007 interim cost reports to determine when prescriptions were filled; and

- correlated retiree eligibility data to detailed drug cost data to determine whether prescriptions were filled within each qualifying covered retiree's coverage and subsidy dates.

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 conclusion based on our audit objective.

RESULTS OF REVIEW

For plan years 2006 and 2007, National Grid had correctly reported drug costs that were incurred under its BCBSMA prescription drug plans within each qualifying covered retiree's coverage and subsidy dates. Accordingly, this report contains no recommendations.