INTRODUCTION

In accordance with Boise Municipal Code Title 1, Chapter 9; and at the general direction of the City Council, the Office of Internal Audit undertook a review of Health Care Trust operations during calendar years 2005 and 2006. The City of Boise utilizes a Trust registered with the State Department of Insurance to administer its health care program. The City contracts with a third-party administrator (Blue Cross of Idaho-BCI) to provide for payment of claims and general administrative services.

This audit is the first of a two-part comprehensive review. That review has been divided into internal and external components. The objectives of the internal component (within the City) were to: 1) Ensure that the Health Care Trust had established an adequate internal control environment surrounding the procedures that support the successful administration of health care related activities established under the State of Idaho’s Certification of Registration No. 3670, the recently adopted City of Boise Health Insurance Trust By-Laws, and the City’s responsibilities listed in the Administrative Services Agreement between the City of Boise and Blue Cross of Idaho. 2) To evaluate whether the City’s Human Resources Department and Treasury Division are efficiently and effectively discharging their assigned duties with regard to the administration of health care related operational and financial responsibilities.

Internal Audit chose to separate the external component (within BCI) into a separate audit with its own set of audit objectives. Ultimately, these objectives will include an internal control assessment of BCI’s claims processing and billing systems. The review will also entail an examination of selected medical/dental, vision, and pharmacy claims. Internal
Audit will assess whether BCI has been in compliance with its third-party administrative responsibilities as described in the Administrative Services Agreement

**SCOPE AND METHODOLOGIES**

The overall objectives of the internal HCT audit were to: 1) Gain a reasonable degree of assurance that the Health Care Trust and the City’s internal departments and divisions have adequately developed, designed, and implemented an adequate internal control environment surrounding the operating, administrative, and financial responsibilities of the City’s health care self-funded program.  2) Ensure that Trust resources are properly safeguarded, and that the goals and objectives established for the Trust and program are being met.  3) Verify that the results of operations have complied with the applicable Idaho State Statutes, City Code, and Administrative Service Agreement. In order to maintain efficiency and gain a reasonable degree of assurance with respect to current operations, Internal Audit established an initial scope of the review to include a 24-month period beginning January 1, 2005, and ending December 31, 2006.

Based on discussions with Plan Trustees and ex-officio members of the Trust, Internal Audit established the following work plan to accomplish the aforementioned audit objectives:

- Determine whether during 2005 and 2006 the operational and financial administration of the Trust, has been in compliance with the Trust Agreement and the newly established By-Laws of the Trust.

- Determine whether the City has met the requirements contained in Article II (Responsibilities of the City) of the Administrative Services Agreement between the City and BCI.

- Determine whether an adequate control environment exists within the City’s Human Resources Department regarding the administration and documentation responsibilities relating to Trust operations.

- Determine whether the City’s Treasury Division has established an adequate control environment, and maintained supporting documentation with regard to the accounting for and wiring of monies related to claims, administrative fees, and excess loss premium payments.

- Determine whether the investment of Health Care Trust assets managed by the City’s Treasury Division are in accordance with Idaho State Statutes and the City’s adopted investment policy. Determine whether Treasury is properly accounting for the investment transactions.

- Determine whether the Trust’s cash inflows appear adequate to meet the weekly claims and monthly Administrative and Excess Loss Premium payments, when compared with the historical cash outflows for the Health Insurance Self Funding (643) Fund.

- Test a sample of Trust expenses and administrative labor JV’s for reasonableness.
Select a sample monthly contribution to the Trust and agree the amounts transferred into the Trust to the supporting budgetary and accounting documentation.

Internal Audit utilized a combination of interviews, observation, detailed attribute and financial testing in order to accomplish the defined audit objectives. Judgmental and statistical sampling methodologies were utilized for detailed testing.

EVALUATION AND COMMENTS

Health Care Trust Overall Operational Evaluation

As of the date of the Audit, the control environment surrounding the internal administration of Trust operations divided between the Health Care Trustees, Human Resources Department, and Treasury Division is characterized as “Satisfactory.” The preponderance of adequate controls over Trust operations, benefit administration, and safeguarding of Trust financial assets factored greatly into the overall evaluation contained herein.

The evaluation scale utilized by Internal Audit in reporting each completed audit is: High Satisfactory, Satisfactory, Marginal, Needs Improvement, and Unsatisfactory. The definition of a Satisfactory grading is as follows:

- Satisfactory – Reportable issues may exist within the audited area. However, they are not deemed to be representative of pattern or practice within the area or entity audited. Issues are typically of an isolated nature. Overall, systems of internal control are effective, and management oversight is adequate and supportive of the accomplishment of goals and objectives.

Internal Audit noted some areas where opportunities for improvement exist within the Health Care Trust, the City’s Human Resources Department and the Treasury Division. Listed below are a series of findings and observations which, if acted upon, will assist in improving the respective internal control environments, operational efficiency, and effectiveness of each entity. For purposes of organization, the audit findings are presented in three groups: Trustees, Human Resources, and Treasury.

Health Care Trust-Trustees

Background and General Observations

Generally, Internal Audit found the Health Care Trustees to be discharging their fiduciary duties in a Satisfactory manner. The Trust conducts monthly meetings and principally relies on Human Resources and Treasury to carry out the day-to-day general administrative and investment/payment responsibilities related to the City’s health care program.

Audit Findings and Observations - Health Care Trustees
• **Health Care Trust Meeting Minutes**: Internal Audit found evidence that not all of the approved meeting minutes were successfully transferred from the Health Care Trust to City Clerk for inclusion in the City Council informational packet.

The timely reporting to City Council of health care related information and Trust decisions is an important mechanism in achieving overall program success. It is the responsibility of the information transmitter to verify that the City Clerk’s Office did successfully include that information in a Council informational packet.

**Health Care Trust Response**

The Health Trust will implement a new procedure to assure that the minutes are successfully forwarded to the Boise City Council through their informational packet. Once the minutes are forwarded to the City Clerk, a Trust support staff member will review the City Council agenda for the next meeting to verify that the minutes were conveyed to the Council in a timely manner. Any discrepancies will be investigated and followed-up by the Trust support staff member with the City Clerk’s Office. If the support staff member cannot resolve any discrepancies in this manner, he or she will report the situation to the Trust Chairman to aid in resolving the matter.

• **Health Care Trust Investment Reporting**: The HCT Trustees are not requesting, nor receiving, periodic investment information (cash flow reports, portfolio structure reports, maturity schedules, and duration reports) related to HCT investments managed by the City’s Treasury Division.

The preponderance of Trust assets are maintained in the Trust’s investment portfolio. Chief among a Trustee’s fiduciary responsibilities include the knowledge of whether monies are being prudently invested; and whether sufficient liquidity is being maintained in reserve to pay the weekly claims and monthly ASC invoices.

Internal Audit believes that by not receiving, nor requesting cash flow and investment information on a periodic basis, the Trustees are not utilizing all the financial information at their disposal. Investment and cash flow information is readily available within the Treasury Division. A monthly reporting mechanism should be instituted that addresses cash flow, current investment strategy, portfolio structure, and diversification/risk sensitivity.

**Health Care Trust Response**

The Trust will request to the City Treasurer that reports be received detailing investment, diversification, portfolio structure and cash flow information monthly. The Trust Officers will meet at least annually with the City Treasurer to review the investment strategy of the Trust.
COBRA/Retiree Terminations: Internal Audit noted that the Health Care Trust has yet to establish written procedures relating to when a COBRA or Retiree Plan member’s coverage should be terminated for non-payment of premiums.

Internal Audit noted that the Health Care Trust has yet to establish explicit policies in the following two areas: 1) A general policy on termination resulting from non-payment of premium and 2) A specific policy pertaining to a situation where an individual is currently paying premiums but still maintaining an outstanding accounts receivable (AR) balance.

Internal Audit noted (from the historical COBRA AR worksheets) a high correlation between individuals that had recurring outstanding AR balances and those individuals having to eventually be sent to City Collections for repayment action.

Internal Audit recognizes that any established policies in this area will have to be formulated within the existing COBRA rules and regulations.

Health Care Trust Response
The Trust will develop a written policy addressing when COBRA or Retiree Plan members should be terminated for non-payment of premiums. The policy will comply with all applicable laws and regulations. The Trust will review the policy with the City’s Benefits Coordinator; who will ultimately implement and apply the policy. Steps will be taken to notify Plan participants affected by the policy.

Human Resources Department

Background and General Observations
The Human Resources Department is the Health Care Trust’s principal operational tool to discharge HCT responsibilities. The benefit-related HCT operational responsibilities presently being discharged within HR include:

- Maintaining Plan information, and securing/paying the electronic and hard-copy claims and ASC invoices.
- Maintaining the active employee, COBRA, and Retiree hard-copy files and updating the benefit coverage information within the PeopleSoft Human Resource Management System (HRMS).
- Reconciling member enrollment equivalence between the HRMS and BCI systems.
- Serving as the City’s primary liaison for Plan members and coordination with the third-party administrator (BCI) regarding enrollee changes and benefit structure modifications established by the Trust.
• Serving as the City’s/Trust’s front-end control mechanism to review the veracity of the weekly medical/dental, vision, and pharmacy claims before payment is submitted to BCI.

• Performing the cashiering and accounting functions of check custody and receipting, deposit processing, and AR tracking relating to Retiree and COBRA premium payments.

• Transcribing the HCT meeting minutes, and delivering those minutes to the City Clerk’s Division for inclusion in a City Council informational packet.

Generally, Internal Audit found the Human Resources Department to be discharging their operational duties related to Health Care Trust benefit administration in a *Satisfactory* manner. Listed below are a series of findings and comments which, if acted upon, will assist the Department in improving its operational efficiency and effectiveness.

**Audit Findings and Observations - Human Resources**

- **HR Controls over Deposits and Check Handling:** *The internal controls surrounding the receipt and deposit of COBRA and Retiree health care premiums in check form is unsatisfactory. The present control environment does not comply with the policy established in City Code Section 1-14-01 DAILY DEPOSITS.*

  During the internal control documentation phase of the audit, Internal Audit noted that COBRA and Retiree checks were being kept unsecured within the Department. Internal Audit noted that checks were not being deposited on a timely basis. Checks were allowed to accumulate for up to two weeks before a deposit was initiated.

  **Human Resources Response**

  *Human Resource staff will comply with the above code section and will address and resolve the practical implications of compliance with the Treasury Division. To further elaborate on the finding, Human Resources receives relatively few checks. Those that we do receive have always been restrictively endorsed and kept in an office that is locked each evening and is inaccessible by any and all City staff other than the individual who occupies that office.*

- **Weekly Review of BCI Paid Claims:** *Internal Audit could not find evidence (signature, date, notes, “okay to pay”) documenting that a comprehensive review was conducted on each invoice before payment had been initiated.*

  During the review of selected weekly claims invoices, Internal Audit determined that the only evidence of review was a circling by the Benefits & Compensation Manager of Aggregate Excess Loss Amounts for some Plan members.
Internal Audit did confirm with the Benefits & Compensation Manager that the invoices were examined before being processed for payment. Internal Audit believes that including signatures, date of the review, and any review notes would assist the department in documenting the review process.

**Human Resources Response**

_The Benefits Manager will initial and date each invoice reviewed as requested._

- **Monthly ASC Invoice Payment:** Based on sample data, Human Resources is not processing the majority of the monthly ASC invoices for payment according to the contractual requirement listed in the Administrative Service Agreement.

The contractual requirement within the Administrative Service Agreement is to have the administrative service invoice paid by the 15th of the month. Internal Audit recognizes that Human Resources is constrained by not having the City’s labor distribution process completed until just prior to the 10th of the month. This constraint makes timely contractual payment difficult; given that the ASC invoice must be reconciled after the City’s payroll process is closed. If the invoice cannot be processed and paid by the 15th of the month, the Agreement between the City and BCI should be amended or renegotiated to allow for a later payment date.

**Human Resources Response**

_Benefit bill reconciliations and payments are constrained by the City’s payroll process. There is a working understanding of a 30-day grace period between BCI and its clients regarding payment of ASC invoices. The City of Boise has always been an account in good standing with BCI. HR staff will work with BCI to determine if the grace period language can be incorporated into future agreements as requested._

- **HCT Administrative Costs:** The labor costs associated with discharging the administrative duties of the Trust have never been invoiced or journal vouchered (JV’d) back from the General Fund to the HCT.

The true cost of operating the Health Care Trust has not been accurately reported in its financial statements since Trust inception. Internal Audit confirmed with HR that a tracking mechanism presently exists to report time that individuals spend on Trust activities. Human Resources should establish a methodology to JV labor costs associated with Trust operations and administration back to the Trust.

**Human Resources Response**

_The Health Trustees have recently approved the JV of labor costs associated with Trust operations. Those JV’s will occur once each year at the close of the City’s fiscal year._
• **Subrogation Recoveries:** *Human Resources does not presently have an established process to account for, report, and track any actual subrogation recoveries that may have been received from BCI. The City is not currently requesting or downloading subrogation recovery reports from BCI.*

Subrogation involves the recovery of paid claims resulting from the negligence of another party. BCI subrogates on the City’s behalf. Subrogation recoveries are listed within the weekly claims invoices as line-item credit adjustments. Presently, HR has not identified which credit entries on the weekly claims invoices are associated with subrogation recoveries, and which are associated with claims adjustments. Human Resources has not tracked, analyzed, or identified amounts, if any, of subrogation recoveries the City has received since the Trust inception.

**Human Resources Response**

*The Benefits Manager may not be able to identify or analyze specific subrogation recoveries by insured due to HIPAA restrictions regarding Protected Health Information. However, subrogation recoveries will be monitored on a monthly basis and reported to the Trustees as requested.*

• **Aggregate Excess Loss Calculation:** *Internal Audit could not find evidence on the BCI correspondence documenting the detailed verification of the prepared calculation.*

The Administrative Service Agreement Article IV-Subsection B states that BCI will refund to the City, the amount (if any) by which paid claims during the benefit year exceed the Aggregate Excess Loss Amount (AELA).

Internal Audit did confirm with the Benefits & Compensation Manager that the yearly Excess Loss Calculation was examined for veracity. Internal Audit believes that including signatures, date of the review, and any review notes would assist the department in documenting the review process.

**Human Resources Response**

*HR staff will initial and date this yearly statement from BCI as requested.*

**Audit Comments and Observations - Human Resources**

• **Weekly Review of BCI Paid Claims:** *Internal Audit recommends that Human Resources investigate whether a more robust front-end claims invoice review system can be implemented. Potentially, this could include an analysis of claims data to augment the high-level review that is now currently being performed.*
Internal Audit believes that the present control environment can be greatly enhanced by utilizing additional quantitative techniques to review medical, dental, and pharmacy claims data including, an employee reporting mechanism that allows a Plan member to report the accuracy of the information contained within their Explanation of Benefits. This type of reporting mechanism is not presently being performed in the current review environment.

**Human Resources Response**

*Human Resources will investigate whether a more robust, front-end claims invoice review system can be implemented.*

- **Mandatory Active Employee Yearly Benefit Reenrollment:** The choice Human Resources has made to annually re-enroll all active employees each Plan year, as it relates to benefit elections other than the mandatory Flexible Spending Accounts, appears to consume an inordinate amount of time. Furthermore, the process appears to be extremely burdensome on departmental resources.

Human Resources has established a City-wide system of yearly “positive confirmation” with regard to benefit election forms. By December 1st of each year, all active employees are required to submit a new benefit election form for the subsequent year.

Internal Audit spoke with the City’s external auditors Eide Bailly and confirmed that from a financial statement audit perspective; there is not a present requirement to positively confirm the benefit elections of all active employees (re-enroll) every Plan year; except for those employees who have elected Flexible Spending or require changes in dependent or Plan coverage options.

Internal Audit selected a sample of the hard-copy employee benefit files on 4/24/07. *All of the 2007 benefit enrollment forms had not been filed within 144 days of the date HR required the forms be submitted to the department.*

Internal Audit did note that the data associated with the 2007 enrollment forms had been updated into the PeopleSoft HRMS system. Furthermore, the forms were being secured in a locked cabinet until filing occurred.

Internal Audit suggests that only the active FSA employees be positively confirmed each Plan year. This system would operate as follows: All current employees that have elected FSA re-enroll each Plan year. All non-FSA active employees are sent a notification (hard-copy or e-mail) of their current benefit election, and the other choices available for the upcoming Plan year. These employees would respond back to HR only when an employee wishes to institute a change in the number of dependents, coverage, or establish a Flexible Spending
amount. A non-response would indicate that the employee does not wish to change their present benefit election.

Such a system would decrease the departmental work load associated with reenrollment and help mitigate the Audit Finding regarding the timely filing of benefit enrollment forms in each hard-copy employee file.

**Human Resources Response**

*HR staff will review the options available to us as well as consulting with our Benefits Consultant. We will implement the most efficient process that complies with existing Federal regulations and is in the best interests of the organization as well as the Health Care Trust.*

- **Monthly ASC Invoice Reconciliation:** A reconciliation is performed monthly comparing the BCI Administrative Service Contract invoice to the City’s Benefit Contribution Register. This reconciliation involves a manual comparison between these two hard-copy documents. From conversations with Human Resources employees, it was discovered that the process is “iterative” in nature; consuming between 6-8 hours - confirming approximately 1,800 active employee, retiree, and COBRA eligible individuals.

Internal Audit confirmed with BCI that the monthly ASC invoice data can be obtained in electronic format. Internal Audit recommends that Human Resources investigate whether this reconciliation can be conducted in a computer-assisted environment utilizing the matching and comparison functionality of a worksheet application like Microsoft Excel. This method, once established, should significantly decrease the amount of time that it takes to perform the reconciliation.

**Human Resources Response**

*HR staff will work with the City’s IT staff and BCI to determine if the availability of electronic data achieves the existing efficiency and accuracy the Internal Audit staff found during their review, without actually involving more staff time.*

**Treasury Division**

**Background and General Observations**

The City’s Treasury Division facilitates the investment of Health Care Trust monies and pays the weekly claims and monthly ASC invoices. Treasury provides assistance to HR by processing a monthly ACH file on US Bank’s electronic banking platform. This transaction automatically debits a retiree’s checking account for their monthly premium amount. Generally, Internal Audit found that Treasury personnel were discharging their HCT investment and administrative related duties in a Satisfactory
manner. Listed below are a series of findings and observations which, if acted upon, will assist the Division in improving its operational efficiency and effectiveness.

**Audit Findings and Observations - Treasury**

- **Treasury Wire Transfer Activity:** Treasury has not instituted a control procedure to allow for City Council approval of out-going wire transfers/bank account automatic debits. These include transfers for: HCT claims and ASC payments, debt service payments, and PERSI / Deferred Compensation payments.

  The City of Boise is processing payments via e-methods to an ever increasing extent. The City’s approval processes should reflect best practice to better effectuate the intent of State law in this area. Best practice would dictate some system whereby City Council would approve expenditures of an electronic nature.

  **Treasury Division Response**

  Within the past few years the nature and volume of electronic payments has evolved significantly. Whereas, five or six years ago electronic transfers were primarily confined to shifting money between various investment accounts and not out of the control of the City and to debt service payments that are controlled by debt service schedules approved by Council.

  Treasury in coordination with Accounting has instituted a system whereby the City Council is now being informed of the electronic payments in much the same way as they are informed of pre-writes and early releases.

- **Daily Treasury Activity Review:** During the period from September 11, 2006 to November 30, 2006, the process surrounding Treasury’s review of the daily settlement activity changed.

  During the period from September 11, 2006 to November 30, 2006, Treasury appeared to change their control procedures regarding each day’s detailed transactional review and money market settlement activity to a higher level review methodology.

  **Treasury Division Response**

  With regard to daily activity reviews, the period noted was during the time between when Mr. McMahon departed as Deputy Treasurer and Investment Officer and Mr. Downen took over. It also overlapped the fiscal year end.

  As Treasury staffing was down in by 1 person (25%) at fiscal year end, work demands required temporarily streamlining some procedures while maintaining the basic level of controls. Treasury took a much more passive investment stance
by rolling new money into money market accounts instead of specific security purchases. Since the yield curve was inverted, passivity was rewarded more than it normally would be. The Treasurer and the SAS discussed which funds to use. The Treasurer reviewed daily cash position sheets online. All wire transfers to fund investments were reviewed and authorized directly by the Treasurer.

Although the process varied, adequate controls were maintained. When the Mr. Downen arrived, the process reverted to the more active and detailed process that was instituted by Mr. McMahon when he held the position of Deputy Treasurer.

• **Investment Confirmations and System Yield Calculations:** Internal Audit found instances where: 1) Investment purchase transactions did not contain a broker confirmation, 2) Incorrect system yield calculations within the investment software for some securities that had a “multi-coupon” type structure, and 3) The investment software (Sympro) application contained inconsistent broker address information for some of the investments contained in the sample.

For the 28 HCT investment purchases tested, five did not have the correct confirmation attached. For the five investments that did not have a confirmation attached, two had no broker documentation and three had copies of the monthly broker statement which listed the trade/transaction. One confirmation (06410F) was addressed to “Christine Edwards.” Ms. Edwards has not been an employee of the City since approximately January 2003.

Internal Audit discovered discrepancies between the Bloomberg Financial System yield documentation and the yield to maturities listed in the Sympro system for some of the multi-coupon securities tested. The Bloomberg Financial System is used to report valuations within the fixed-income, equity, foreign exchange, and commodities markets. Incorrect individual security yields contained within the system have the potential to distort the reporting of overall portfolio returns when held in sufficient concentration.

In reviewing investment purchases, Internal Audit noted some inconsistencies of the broker addresses contained in the system.

**Treasury Division Response**

With regard to the systemic multi-coupon securities miscalculation, Mr. McMahon identified this issue when he was Deputy Treasurer since then, Treasury has been working with the software provider to get a fix. We are told that it will be a part of their next update which is currently near completion. However, in the meantime, Treasury has various other means available for verifying the rate and making adjustments to the system generated journal entries when necessary. Reports provided by the City’s custodial trustee, Wells Fargo Bank, and analytics available on Bloomberg allow Treasury to identify accurate information. Interest receipts
are verified to some or all of these sources as appropriate when received and are
reconciled quarterly to assure that the General Ledger accurately reflects the
interest earned on investments.

With regard to broker addresses in SymPro, the information to which the auditor
refers is not the official log of contact information. The primary use of those
fields is to identify and report the allocation of purchases between different
brokerages. Addresses are in the system only as ancillary information and so,
consequently, are not necessarily expected to be complete. Some of the apparent
discrepancies are not discrepancies at all in that the mailing address for written
correspondence with the brokerage is often centralized in a different city than the
location of the actual broker. Therefore, to clarify and simplify, Treasury is
removing all broker addresses from the system, leaving only the broker’s name
and firm.

With regard to the one confirmation with the name of a former employee, it appears
that both the former Deputy Treasurer and the Treasurer missed that one when the
others were changed. The correction will be made and other confirmations
reviewed to assure that there are no others with a similar problem.

- **Health Care Trust Investment and Bank Reconciliations:** During October and
  November 2006, the monthly investment reconciliation did not reveal an error that
  occurred between the Health Insurance Self Funding (Fund 643) money market
  balance and the pooled balance of all other Funds for the two Wells Fargo money
  market accounts.

  Part of the monthly investment reconciliation duties should involve an agreement
  between the money market investment software (Sympro) balances as compared to
  the balances listed on the two Wells Fargo Trust statements.

  The reconciliations for the Health Care Trust bank account are being reconciled
  by the division member who initiates cash transfers between the HCT and the
  City’s Pooled Bank Accounts. The HCT bank reconciliations are not being
  initialed, dated, and reviewed by a “one-up” supervisor after being prepared by
  the Senior Accounting Specialist (SAS). Internal Audit found instances during
  2006 where the interest earned on bank account balances was not being timely
  booked into the Health Insurance Self Funding General Ledger; requiring
  reconciling differences being listed on the bank reconciliations. As of 7/24/07,
  Treasury had not timely reconciled the May and June 2007 bank statements.

  Proper segregation of duties, as it relates to bank reconciliations, requires that the
  individual processing detailed bank transactions should not reconcile the bank
  statement. During 2005, Treasury segregated the bank reconciliation duties from
  the detailed processing of banking transactions.
During 2006, the reconciliation duties were subsequently assigned to the SAS, who was also responsible for the detailed banking transactions. The internal control environment was compromised with the subsequent decision to have the SAS perform the monthly reconciliations during 2006. Internal Audit believes that the optimal control would be to have the City’s Accounting Division reconcile the HCT bank account during their monthly bank reconciliation process.

**Treasury /Accounting Response**

With regard to the out of balance finding, that error was discovered during the reconciliation process and had already been corrected before it was identified by the audit.

With regard to the segregation of duties finding, Treasury has recently returned the monthly checking account reconciliation to the Controller’s office. This will provide the level of segregation of duties which we all desire.

**MANAGEMENT AND TRUSTEE PARTICIPANTS**

Shawn Miller, Human Resources Director  
Kent Rock, City Treasurer and Risk Manager, Health Care Trust Chairman  
Carla Miller-Lowe, Benefits and Compensation Manager and Trust Ex-officio