



Commonwealth of Massachusetts

Management Letter

June 30, 2015



KPMG LLP
Two Financial Center
60 South Street
Boston, MA 02111

June 10, 2016

The Comptroller's Advisory Board
Commonwealth of Massachusetts
Boston, Massachusetts

Advisory Board Members:

We have audited the basic financial statements of the Commonwealth of Massachusetts (the Commonwealth) as of and for the year ended June 30, 2015, and have issued our report thereon dated May 18, 2016. In planning and performing our audit of the basic financial statements of the Commonwealth, in accordance with auditing standards generally accepted in the United States of America, we considered the Commonwealth's internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinions on the basic financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Commonwealth's internal control. Accordingly, we do not express an opinion on the effectiveness of the Commonwealth's internal control.

During our audit, we noted certain matters involving internal control and other operational matters that are presented for your consideration. These comments and recommendations, all of which have been discussed with the appropriate members of management, are intended to improve internal control or result in other operating efficiencies and are summarized on the attached schedule of observations.

The Commonwealth's written responses to our comments and recommendations have not been subjected to the auditing procedures applied in the audit of the basic financial statements and, accordingly, we express no opinion on them.

In addition, we identified certain deficiencies in internal control that we consider to be a material weakness and others that we consider to be significant deficiencies, and in accordance with *Government Auditing Standards* communicated them in writing to the Commonwealth in a separate report dated May 18, 2016.

Our audit procedures are designed primarily to enable us to form opinions on the basic financial statements, and therefore may not bring to light all weaknesses in policies or procedures that may exist. We aim, however, to use our knowledge of the Commonwealth's organization gained during our work to make comments and suggestions that we hope will be useful to you.

We would be pleased to discuss these comments and recommendations with you at any time.



This communication is intended solely for the information and use of management of the Commonwealth, and is not intended to be and should not be used by anyone other than these specified parties.

Very truly yours,

KPMG LLP

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Schedule of Observations

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MLC 2015-01

MMIS – Disaster Recovery Testing

Observation

In 2014, it was noted that the annual Disaster Recovery (DR) test for the MMIS application was not performed during the year.

There is a potential risk that data may not be fully recovered from the back-up media in the event of a disaster/emergency without having a Disaster Recover test performed on a periodic basis to test the usability and integrity of the backup media.

Upon follow-up in FY 2015, it was noted that the control deficiency described above has not been remediated.

Recommendation

Disaster Recovery tests should be performed on periodic basis to ensure that the data can be successfully recovered from back-up media in the event of a disaster/emergency.

Management's Corrective Action Plan

Disaster Recovery Testing of the MMIS application was not performed due to time and resource constraints. Three key projects (HIX, HIE and AIMS) were deemed a higher priority.

The technical refresh for MMIS is scheduled for completion in January 2016 and regular Contingency Plan / Disaster Recovery testing will commence.

Responsible Officials

Brian Chase, Director, IT Controls & Quality Assurance, Acting Chief Information Security Officer

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MLC 2015-02

UI Online Infrastructure Changes

Observation

During the 2014 audit, because of the way they are documented in the ticketing system, we could not identify a complete population of UI Online infrastructure changes. Infrastructure changes include installation of new or replacement hardware, upgrades to operating systems and the application of security patches. From the limited population identified, four of eight infrastructure changes examined did not receive Computer Advisory Board (CAB) approval on the iSupport ticket which is a requirement of the change management policy.

Upon follow-up in FY 2015, it was noted that the control deficiency described above has not been remediated.

Recommendation

It is suggested that:

- Non-emergency infrastructure change tickets be raised in iSupport and identified as infrastructure and be required to have CAB approval before installation.
- Emergency infrastructure changes that may have to forego pre-approval by CAB should be documented in an iSupport ticket within one week of action and may be appropriately authorized after the fact.

Management's Corrective Action Plan

EOLWD IT has made an extensive effort in the past year to address the way in which Change Orders are coded within iSupport. A complete review of change tickets was made which pointed to the need of a new categorization schema for iSupport. An iSupport upgrade project is underway, in which the categorization table will be replaced, allowing the team to streamline and normalize the many choices that make proper reporting impossible. A Change Control Workshop was held to educate the EOLWD IT staff in the importance of Change Control and its principles. UI Online Production server changes have received heightened awareness in Change Advisory Board (CAB) in the past year.

The process documented in the Change Control Process for Production System Change Approval manual, provides Proof of Change Advisory Board approval as identified by "Approvals", in the drop down menu housed in the Change Control module. iSupport is currently expected to be upgraded by 4th quarter 2015.

Responsible Officials

Michael Milligan, Secretariat Chief Information Officer

Commonwealth of Massachusetts

Schedule of Observations

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MLC 2015-03

MassIT - HR/CMS - Privileged Access to the Operating System

Observation

Four (4) administrators with privileged access to the operating system hosting the HR/CMS application share the same credentials (the root account) for administrative functions. All 4 administrators are appropriate to have such access.

We noted that there are only 4 administrators with this access and that they access through a central management server that does have logging functionality. However, the logs from the HR/CMS operating system or the management server are not monitored or periodically reviewed to verify access to the privileged account was appropriate.

The administrative account has broad access to the HR/CMS operating system and presents the risk of unauthorized and undetected changes being made to the system/files hosted on the server potentially impacting financial data/transactions.

Upon follow-up in FY 2015, it was noted that the control deficiency described above has not been remediated.

Recommendation

Access should be restricted and traceable to individuals to ensure that all use of these accounts is appropriate. It is recommended to either implement named accounts for all users as well as log their access. If this is not feasible, we recommend to periodically review the logs of users that access the privileged account to verify all access is appropriate.

Management's Corrective Action Plan

MassIT will log all authentications to the AIX servers and the administration server. AIX Admins will log into the administration server as themselves and from the administration server authenticate to the HRCMS servers as root (root login is required). Logs will be sent to MassIT Compliance & Assurance log management solution, automatically reviewed and direct logins to the servers escalated to AIX management to be addressed.

Responsible Officials

Jim Cusson, CISSP, Compliance & Assurance Program Director

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MLC 2015-04

MassIT - HR/CMS - Production Job Failures

Observation

Documentation regarding follow-ups of production job failures is not consistently maintained. Noted that for 8 of the 15 failures sampled, the Commonwealth was unable to produce documentation showing the next successful run of the production jobs.

The risk increases that job failures that may affect the complete and accurate processing of financially relevant information are not detected and resolved timely.

Recommendation

The observation noted revolved mainly around a lack of documentation regarding the follow-ups for failed jobs. We recommend to more formally capture any and all job failures and document the follow-ups performed including if the job ran successfully upon a second attempt.

Management's Corrective Action Plan

Documentation of failed production HR/CMS jobs will be maintained. Documentation of subsequent successful production of HR/CMS job runs will be maintained.

Responsible Officials

Jim Cusson, CISSP, Compliance & Assurance Program Director

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MLC 2015-05

MassIT - Change Management

Observation

In the change management ticketing system an approval by business is recorded for migrating changes to production. However, this approval is recorded by a member of the IT team and evidence of the original business approval (e.g. an email) is not retained. For 2 of the 25 changes sampled, the original approval evidence could not be produced. However, it was noted that these changes were appropriate and authorized to be implemented at the time.

The risk increases that changes are migrated to production without business approval which could affect the confidentiality, availability and integrity of the system.

Recommendation

Commonwealth should consider to:

- Have business approvers provide their approval directly in the ticketing system. That would help ensure that approval evidence is retained and that only appropriate personnel is able to approve changes for migration;
- Alternatively, if direct approval in the ticketing system is not feasible, MassIT should consider consistently attaching the business approval to the ticket so that relevant approvals can be easily retrieved when needed.

Management's Corrective Action Plan

Starting January 1, 2016, the MassIT HR/CMS Technical group will require an electronic signature within the IBM Rational jazz RTC – Rational Team Concert application for any migrations into the HR/CMS application. We will need to train all of our authorized signatory approvers to start this process by the implementation date specified below.

Training will be done in the month of December 2015.

Responsible Officials

Edward Colley, Applications Technical Support Manager, MassIT

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MLC 2015-06

Department of Workforce Development (DWD/EOL) - Allowance for Uncollectible Receivables

Observation

During our audit, we reviewed the department's methodology and related documentation to support its estimate of uncollectible receivables and noted the following:

- Rather than being a robust multi-year analysis of collection activity, write-off and recovery patterns, days outstanding and/or other key indicators of collection activity to support its allowance methodology, the department's formula for recording an allowance relies more on static statutory guidelines.
- The accounts receivable (Employer) write-off calculation improperly included unmatched funds resulting in an overstatement of the allowance.
- The allowance for uncollectible amounts (Non-Employer) was not supported by a multi-year analysis.

Recommendation

We recommend that the department annually update its methodology based upon a look back of its actual collection experience. The look back period should be established by management and should include sufficient history to accurately estimate the net realizable value of its receivables at year-end. In addition, the final allowance calculation should be formally reviewed by senior management to ensure its accuracy and preparation in accordance with department guidelines.

Management's Corrective Action Plan

EOWLD Finance will work with DUA Revenue Business operations to implement a comprehensive automated process that develops an allowance for uncollectible data annually.

Responsible Officials

Aaron D'Elia, Chief Financial Officer
Executive Office of Labor and Workforce Development

Robert Cunningham, Director
Department of Unemployment Assistance

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MLC 2015-07

Department of Workforce Development (DWD/EOL) - Revenue

Observation

During our audit, we noted that cash received from the federal government in the amount of \$7,085,673 was not recorded as revenue.

That balance on the financial statements was corrected by the department; however, the adjustment was classified as a negative expense instead of revenue.

Recommendation

We recommend that the department perform bank reconciliations to ensure that amounts are properly recorded.

Management's Corrective Action Plan

EOWLD Finance has implemented a comprehensive bank reconciliation process and is in the process of scoping out and implementing a UI trial balance for fiscal year 2017.

Responsible Officials

Aaron D'Elia, Chief Financial Officer
Executive Office of Labor and Workforce Development

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MLC 2015-08

Department of Workforce Development (DWD/EOL) – Overpayments

Observation

During our audit, we noted that the overpayments balance was overstated by approximately \$5.5 million. The overpayments reported on the financial statements incorrectly included "inactive" payments. Inactive payments occur when adjudications override a prior payment. The overpayments report was not configured to show only the most recent decision, therefore, each case showed an inaccurate receivable. This resulted in an inflated balance. After inquiry during our audit, the overpayment report was re-run without the "inactive" payments. While the report was re-run on the department level, the corrected balance was not reflected on the financial statements.

Recommendation

We recommend that the department develop procedures to ensure reports generated for financial records are complete and accurate.

Management's Corrective Action Plan

EOLWD Finance will work with DUA to ensure overpayment balances are accurately reflected in financial statements and UI online system.

Responsible Officials

Aaron D'Elia, Chief Financial Officer
Executive Office of Labor and Workforce Development

Robert Cunningham, Director
Department of Unemployment Assistance

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MLC 2015-09

Group Insurance Commission (GIC) – Service Organization Controls Report

Observation

The Group Insurance Commission (GIC) utilizes five insurance companies providing health plan administration services. GIC relies on insurance companies for claim receipt and entry, claim adjudication, and claim payment and customer funding. The insurance companies' controls are reviewed annually by a third-party which provides a service organization control (SOC) report detailing the status of controls and whether they are operating effectively. For one insurance company, no SOC report was provided covering fiscal year 2015.

Recommendation

We recommend that the GIC require that all its health plan administrators provide appropriate confirmation, in the form of a SOC report and bridge letter if applicable, regarding the status of its control environment for the full fiscal year.

Management's Corrective Action Plan

The GIC requires that all insurance companies provide a service organization control (SOC) report detailing the status of controls and whether they are operating effectively. Our recent contract with Beacon Health requires that the Statement on Standards for Attestation Engagements (SSAE) no. 16 report must be received by the Commission annually, no later than three months from the report's end date, October 1, 20xx. The report must cover a twelve month period starting July 1, 20xx. The report must include a summary of all noted weaknesses of control objectives and control activities, which often include controls over information technology and related processes. Additionally, the Contractor must submit a corrective action plan, including the date on which the plan anticipates the weaknesses being corrected. Quarterly updates shall be submitted until there is resolution satisfactory to the Commission. The Commission may assess an annual penalty of up to \$50,000 if an acceptable SSAE report is not received by October 1 of the applicable year.

On January 1, 2016 Beacon provided the GIC with an update on its progress in producing a SOC-1 Type II report. During the month of December, Beacon completed its first SOC Type II pre-audit in accordance with the Statement on Standards for Attestation Engagement (SSAE) no. 16. This pre-audit is in preparation of the audit to take place during the reporting period January 1, 2016-June 30, 2016. The audit is scheduled to be completed by August 31, 2016. Beacon has engaged KPMG to complete the audit and they are actively testing the controls. The final report is scheduled to be issued by September 30, 2016 pending successful completion of all control testing.

Responsible Official

Margaret Byrne, Acting Director of Finance

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MLC 2015-10

Department of Revenue (DOR) – Timing of Preparation and Review of Bank Reconciliations

Observation

The Department of Revenue's (DOR) Revenue and Accounting Policies and Procedures manual requires that bank reconciliations be performed by the 30th day of the following month or within 30 days after the final "Blue Book." A review of completed reconciliations should be completed within 10 days of the reconciler's completion date.

During our audit, we reviewed twenty-five (25) separate bank reconciliations for the months of January 2015 and June 2015 and noted the following:

For 14 out of 25 bank reconciliations, preparation occurred 20 days after period close. For 3 out of 25 reconciliations, review occurred more than 10 days after preparation. For 1 selection out of 25, the signoff sheet was missing.

Recommendation

We recommend that DOR adhere to its existing policies and procedures regarding the timely completion of its bank reconciliations and ensure that all appropriate documentation is maintained.

Management's Corrective Action Plan

All bank accounts are monitored on a timely basis, either daily or weekly to prevent or detect irregularities and to ensure all summary transactions are posted timely in DOR's Tax Administration Systems (MassTax and GeniSys).

DOR agrees with the significance of timely bank reconciliations and will re-emphasize the need to adhere to existing related policies and procedures and ensure that all appropriate documentation is maintained.

Responsible Officials

Tanya Bruno, Director of Revenue Accounting, Department of Revenue
Marcel Vernon, CFO, Department of Revenue

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MLC 2015-11

Department of Revenue (DOR) – Allowance for Uncollectible Receivables

Observation

During the audit, we reviewed the department's methodology and related documentation to support its estimate of uncollectible receivables and noted the following:

- Rather than being a multi-year analysis of collection activity, write-off and recovery patterns, days outstanding and/or other key indicators of collection activity to support its allowance methodology, the Department of Revenue (DOR) derives its allowance percentage from a Collections Department Report to estimate its allowance for uncollectible accounts.
- This model relies on prior year as well as current year data to estimate future activity but does not consider the effect of one-time events/ anomalies (e.g. large legal settlements which occurred during fiscal year 2015) in forecasting expected future results.
- The allowance is calculated for the taxes receivable balance in total and does not take into consideration different collection rates for different tax types.

Recommendation

We recommend that the department annually update its methodology based upon a look back of its actual collection experience. The look back period should be established by management and should include sufficient history to accurately estimate the net realizable value of its receivables at year-end. In addition, we recommend that the department adjust its methodology for any current year known anomalies so that future year projections of the allowance for uncollectible accounts is not adversely impacted by one-time events/ anomalies.

Management's Corrective Action Plan

DOR is in the process of changing the allowance for doubtful accounts methodology to reflect the above mentioned recommendations.

Responsible Officials

Tanya Bruno, Director of Revenue Accounting, Department of Revenue
Marcel Vernon, CFO, Department of Revenue

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MLC 2015-12

Massachusetts Teachers' Retirement System (MTRS) – Census Data

Observation

The Massachusetts Teachers' Retirement Board (MTRB) is responsible for maintaining member census information for all active employees who contribute to and participate in the Massachusetts Teachers' Retirement System (MTRS). Significant elements of census data include: date of birth; date of hire or years of service; eligible compensation; and gender among other elements. Effective management of the census data for active employees include procedures to verify the underlying payroll records of the participating employers to determine that the information provided is complete and accurate as this census information is also utilized by the Public Employees Retirement Administration Commission (PERAC) to calculate a projected pension liability, a significant accounting estimate that is part of the financial reporting process.

During the fiscal 2015 audit, we selected over 800 active members for census data testing. The members were selected from 34 participating employers (from a population of over 400 participating employers).

The results of our testwork indicated several errors in various census elements including:

- 6 date of birth errors
- 31 pensionable wage errors, 29 of which related to new hires
- 50 creditable service errors, 26 of which were related to the failure to properly set the "adjusted employment date" with transfers of service, the remainder were for various unrelated factors

Recommendation

While the MTRB has made significant improvement in its census data collection and reporting process, census data errors continue to occur, albeit with decreasing frequency. We recommend that MTRB identify root causes for its pensionable wage and service credit errors and refine its system of internal controls including its IT controls to eliminate those root causes. Certain root causes may require a collaborative effort on the part of the MTRB and PERAC to resolve especially for new hires and for members who work part-time.

We also recommend that MTRB be more diligent when inputting or updating members' date of birth as such errors are a result of human error and or a lack of proper review of such activity.

We also continue to recommend that MTRB consider including a payroll audit function, either as an internal or outsourced resource, as part of its overall internal control strategy. A payroll audit function should include a risk based approach to determine which participating employers' payroll records require greater oversight and review.

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Management's Corrective Action Plan

The quality of our census data information from our 423 employers continues to improve due to the data validations implemented to detect and eliminate financial data discrepancies in our pension management information system (called MyTRS). These validations are applied before each monthly retirement deduction report is accepted into MyTRS. MTRS service representatives are also in frequent contact with the payroll officers at the school districts to ensure that the demographic and financial data is accurate.

Additionally, the MTRS provides an annual statement to members regarding their pension account balance, as well as, member demographic data including: date of birth, gender and marital status. Members are asked annually to validate the information provided on their statement and report any updates and/or discrepancies. MTRS is in the process of providing on-line access to all members in order to view their pension accounts. Currently, over 28,000 active members have access to their information on-line. As part of the application for retirement benefits members are required to provide a birth certificate with their application. An application will not be processed without the birth certificate.

In regard to pensionable wage errors, we will continue to work with PERAC staff to root out the errors for newly hired members. The wage errors in the census data file are created when the reported earnings are being annualized. Last year the MTRS provided PERAC with a separate file that identified the annual salary of newly hired MTRS members and will do so again this year and work towards having that data included within the final census data file.

In regard to the creditable service errors, a correction to the logic that populates a field called the "adjusted employment date" was installed shortly before we generated the calendar year 2014 census data file. The correction incidentally created a new error condition that ignored certain service transfers when creating adjusted employment dates for members. The new error condition was detected and corrected by our project management team after the calendar 2014 census data file was generated. A small portion of the remaining errors were data conversion errors.

The Commonwealth's independent auditor (contracted by the State Comptroller) in consultation with the MTRS annually conducts 34 census data audits on a rotational basis as outlined by the AICPA and as part of the GASB 67 review. We are in the third year of these audits and will be reviewing with all parties whether to continue under the current structure or design and implement a new process in the near future.

In addition to the process review of the census data audits, the MTRS will also consider including a payroll audit function, either internal or outsourced, as part of the MTRS internal control strategy after conducting a cost benefit analysis. If approved, the audits shall be selected using a risk based approach as outlined by the AICPA.

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Responsible Officials

Erika Glaster, Executive Director, Massachusetts Teachers' Retirement Board

Sean Neilon, Assistant Executive Director, Massachusetts Teachers' Retirement Board

Marybeth Shaughnessy-Newall, Director of Compliance and Financial Reporting, Massachusetts Teachers' Retirement Board

Robert George, Director of Employer Services, Massachusetts Teachers' Retirement Board

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MLC 2015-13

Massachusetts State Employees' Retirement System (MSERS) – Census Data

Observation

The Massachusetts State Retirement Board (MSRB) is responsible for maintaining member census information for all active employees who contribute to and participate in the Massachusetts State Employees' Retirement System (MSERS). Significant elements of census data include: date of birth; date of hire or years of service; eligible compensation; and gender among other elements. Effective management of the census data for active employees include procedures to verify the underlying payroll records of the participating employers to determine that the information provided is complete and accurate as this census information is also utilized by the Public Employees Retirement Administration Commission (PERAC) to calculate a projected pension liability, a significant accounting estimate that is part of the financial reporting process.

During the fiscal 2015, audit we selected over 300 active member accounts for census data testing. The accounts were selected not only from the Commonwealth but also two state universities, one community college and one of its component units for detail testing which also included comparing such information to the census file used by PERAC.

The results of our testwork indicated the following data quality issues:

- Under its current Legacy computer system, on an annual basis, an active member census file is run by the MSRB to compile census information for PERAC. Based on our discussions with MSRB, due to the size of the database, this file is run in a series of queries over a five week period over the active or "live" MSERS database.

One of the data elements utilized by the PERAC as part of the calculation for total pension liability is creditable service. MSRB derives creditable service based on date(s) and amount(s) of member contributions. Additionally, based on the timing of when the MSRB queries the active system, a member who is queried during the first week the query is run will have less contributions than a member who is queried during the later periods the query is run. This methodology results in varying creditable service for members with the same service history, as of a fixed point in time.

Approximately 32% of the sample selected for testing had one month of additional creditable service during calendar year 2014 than expected. Approximately 6% of the sample selected for testing had one month less of creditable service during calendar year 2014 than expected. This incremental month of service was not related to items such as leave of absence, buy back, part-time schedule, etc.

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- Thirteen entities, which participate in MSERS had no active members reported in the census file although they reported covered payroll figures. These entities do not report payroll data via the Commonwealth's HRCMS system administered by the Office of the Comptroller. This is due to several factors: Payroll data is manually reported to the MSRB by these, and similar entities, on a monthly basis; updated payroll data and current member contribution-information is frequently received late from these employers. Membership from these entities account for less than 1% of the total covered payroll for calendar year 2014. Based on information received from MSRB, it appears as though there were 777 members not coded as active in the census file, representing less than 1% of total active members in the MSERS.
- A few (less than 10) data quality issues related to incorrect date of birth.

Recommendation

We recommend that MSRB freeze the active member database prior to producing the census file. In addition, we recommend that the MSRB assess the impact of the additional month more or less of service given to certain members on the total pension liability.

We also recommend that MSRB be more diligent when inputting or updating members' date of birth as such errors are a result of human error and/or a lack of proper review of such activity.

We also continue to recommend that MSRB consider including a payroll audit function, either as an internal or outsourced resource, as part of its overall internal control strategy. A payroll audit function should include a risk based approach to determine which participating employers' payroll records require greater oversight and review.

Management's Corrective Action

The MSRB will assess the benefits of dedicating resources toward payroll audit function subsequent to the implementation of MARIS and after it has had an opportunity to determine whether the revised reporting of payroll and related data has improved the quality of census data available to the Board. Similarly it is unclear under MARIS whether the MSRB will require an extended period of time to compile the census data as it is under its Legacy system. Assessments of a payroll audit function and whether "freezing" the database will be necessary would occur after the Board has had a reasonable period of time under the new system also taking into consideration the data converted from the existing Legacy system. MARIS is scheduled to become operational in the fall of 2016.

The agencies who report their payroll data manually are reminded regularly for timely reporting and receipt of member contributions. If payroll data and/or contribution is not received within sixty ("60") days of the previous contribution, the member is converted to inactive. When the contribution is received, the member reverts to being active in the system. The MSRB has a department dedicated to working with these agencies so that data and contributions are submitted timely and accurately. Retirement benefits or member disbursements related to employees of

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these entities may not be initiated or processed until all data and contributions are received by the MSRB and verified.

The Board regularly emphasizes with staff the continuing need for accuracy when inputting data or updating member records. The Board will assess whether further training of staff or enhancing QA functions would be beneficial.

Responsible Officials

Nicola Favorito, Executive Director, Massachusetts State Retirement Board