

**City of Brampton Claims Management Audit– Final Audit Report**  
**Private & Confidential**  
**Audit Report**

<b>Audit Name</b>	City of Brampton, Claims Management		
<b>Sponsor(s)</b>	Jonathan Brewer (Acting Manager, Risk & Insurance)		
<b>Business Unit</b>	Insurance and Risk Management, Legislative Services	<b>Date Issued:</b>	August 25, 2022

**1.0 Executive Summary**

Audit Report Rating: The Claims Management Audit is rated as "**Improvement Required.**" See **Appendix 2** for the criteria for Audit Report Rating.

The inherent risk was evaluated as high given the dollar value of contracts and potential insurance liability risk exposure. The audit report identifies six issues, one of which is rated as Priority 1 (P1), and the rest have been rated as Priority 2 (P2). The P1 finding that "Certificates of Insurance are not properly recorded and tracked" does not impact the overall Claims Management process. However, the finding was reported in previous Internal Audits. Vendors are responsible for recording and updating their Certificates of Insurance as part of a project. City management is responsible for verifying that vendors properly record Certificates of Insurance during the lifetime of a project, and management should ensure the verification is taking place. Please see the detailed findings below.

During our review, we observed the following strengths across the organization:

- Insurance coverage for risk categories is periodically reviewed and updated per the City's current insurance risk profile. This includes checking claims for accuracy, estimating reserves, and following up on unusual claims to ensure that the claims are receiving the attention required.
- Insurance and Risk Management staff possess several years of relevant industry experience managing insurance claims.

Internal Audit discussed the following improvement opportunities with Management:

- Certificates of Insurance (COI) should be properly recorded and tracked to ensure the vendor has adequate insurance coverage to protect the City.
- Voluntary risk evaluations for City properties should be conducted periodically.
- Annual reports outlining the division's performance should be prepared and submitted to the Committee of Council.
- Key Performance Indicators should be formally tracked and reported.
- Trust fund expenditure details received from the external adjuster should be verified for accuracy and supporting evidence.
- Formal quality assurance review of insurance claims files should be performed monthly or at least quarterly.

These issues and associated management action plans are explained in more detail within the body of this report.

## 2.0 Background, Objectives, and Scope

### Background

The City mitigates the risks of adverse events that can prevent the City from achieving its objectives with an insurance and claims management program by purchasing sufficient insurance coverage. Adverse events could negatively affect the municipal services the City provides, potentially delay the delivery of a project, negatively affect any of the City's stakeholders, and adversely impact the City's finances. The insurance coverage includes the risk of legal action by third parties against the City arising from any incident causing losses or injuries to any person or property and the risk of damage or loss to the City or its assets. The Insurance and Risk Management (IRM) section of the Legislative Services Department administers the program.

The IRM provides the following specific claims management services:

- Investigating and processing insurance claims
- Adjusting (making a determination of how much the City should pay) third-party claims made against the City
- Processing City claims for first-party vehicle and property loss or damage (i.e. damages suffered by the City)

In addition, IRM reviews City contracts and agreements for vendor's insurance coverage and indemnification provisions, renew the City's insurance policies annually, conducts risk assessments, and provides recommendations to address potential risk exposures. The IRM also provides subrogation to the City departments that have incurred expenses to repair or replace City property damaged by a third party, where the third party has been identified. As an example of subrogation, suppose the City has incurred costs of replacing a bus shelter damaged by a third party vehicle where the identity of the third party is known. In that case, IRM may pursue efforts to recover costs from the third party (or the third party's insurance provider). Lastly, IRM also provides training to City staff on how to deal with incidents that may give rise to claims.

According to data provided by IRM, the City paid approximately \$9 million in claims between 2017 and 2021 for 1,625 claims received. On average, the City received 325 claims and paid out \$1.8 million per year.

The following table shows the total amount of claims paid for the years 2017-2021 for major claim types. Liability and Transit claims accounted for 85% of all claims paid in 2017-2021.

#### Value of claims paid ('000's) 2017-2021

Claim Type	2017	2018	2019	2020	2021	Total	%
Liability	\$436	\$522	\$423	\$109	\$151	\$1,641	18%
Transit	\$1,249	\$774	\$1,961	\$1,412	\$610	\$6,006	67%
Other Claims*	\$102	\$552	\$142	\$173	\$365	\$1,334	15%
Total	\$1,787	\$1,848	\$2,526	\$1,694	\$1,126	\$8,981	100%

\*Auto Fleet, Property, and Errors & Omissions

## 2.0 Background, Objectives, and Scope

The following tables show the number of claims received in 2017-2021 by the type of claim. Liability and Transit claims accounted for 91% of the claims received and 85% of the total value of claims paid in 2017-2021.

### Number of claims received 2017-2021

Claim Type	2017	2018	2019	2020	2021	Total	%
Liability	169	243	234	217	132	995	61%
Transit	116	82	120	91	72	481	30%
Other Claims*	35	30	33	17	34	149	9%
Total	320	355	387	325	238	1,625	100%

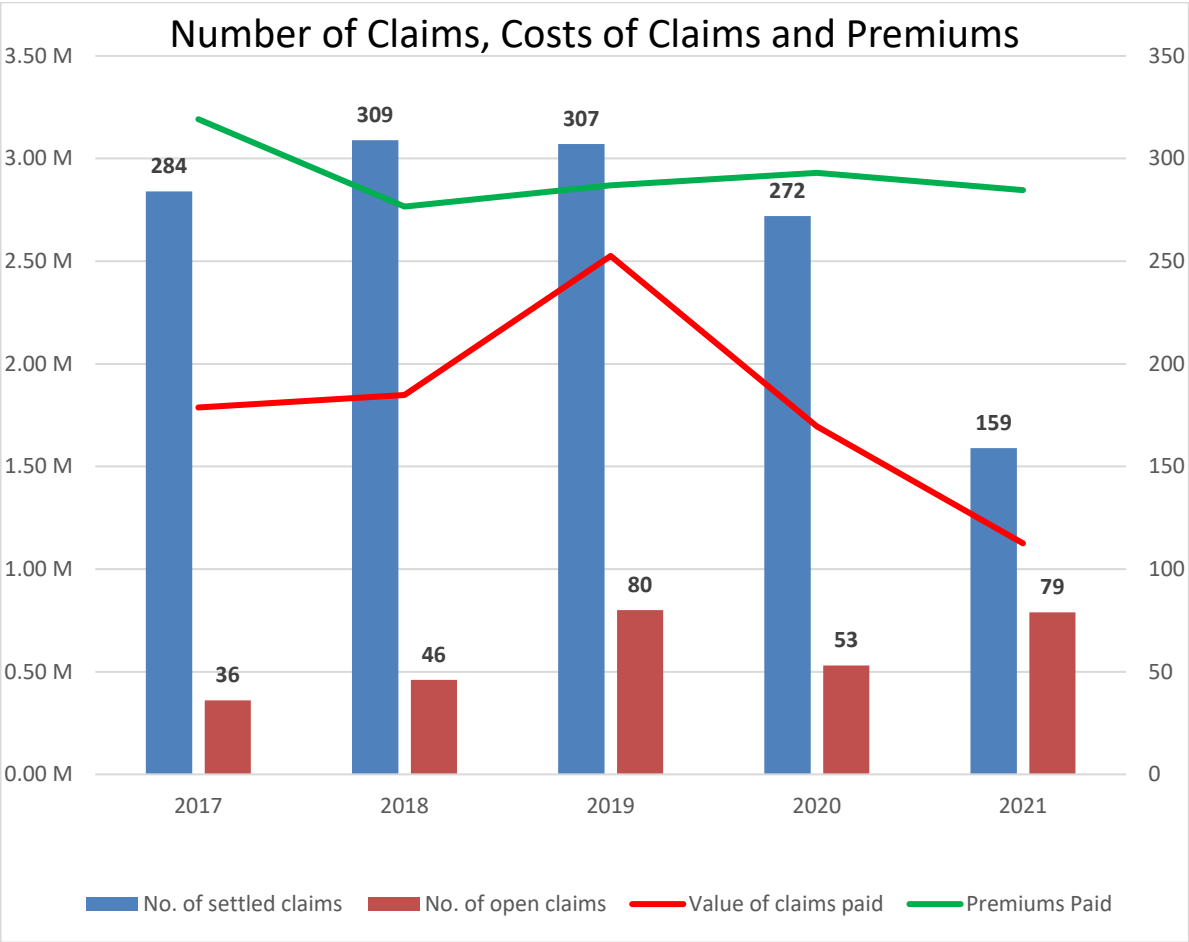
\*Auto Fleet, Property, and Errors & Omissions

The following table shows the number of open and settled claims and the value of claims and insurance premiums paid in 2017-2021. Between 2017 and 2021, the City incurred \$14.6 M in insurance premiums, paid out \$9 M in insurance claims, and recovered \$0.4 M through subrogation. In addition, IRM has estimated the potential exposure from the open claims to be \$6.2 M as of December 31, 2021.

Year	No. of claims settled	No. of open claims	Value of claims paid	Premiums Paid
2017	284	36	1.78 M	3.19 M
2018	309	46	1.85 M	2.77 M
2019	307	80	2.53 M	2.87 M
2020	272	53	1.69 M	2.93 M
2021	159	79	1.13 M	2.85 M
<b>2017-21</b>	<b>1,331</b>	<b>294</b>	<b>8.98 M</b>	<b>14.60 M</b>

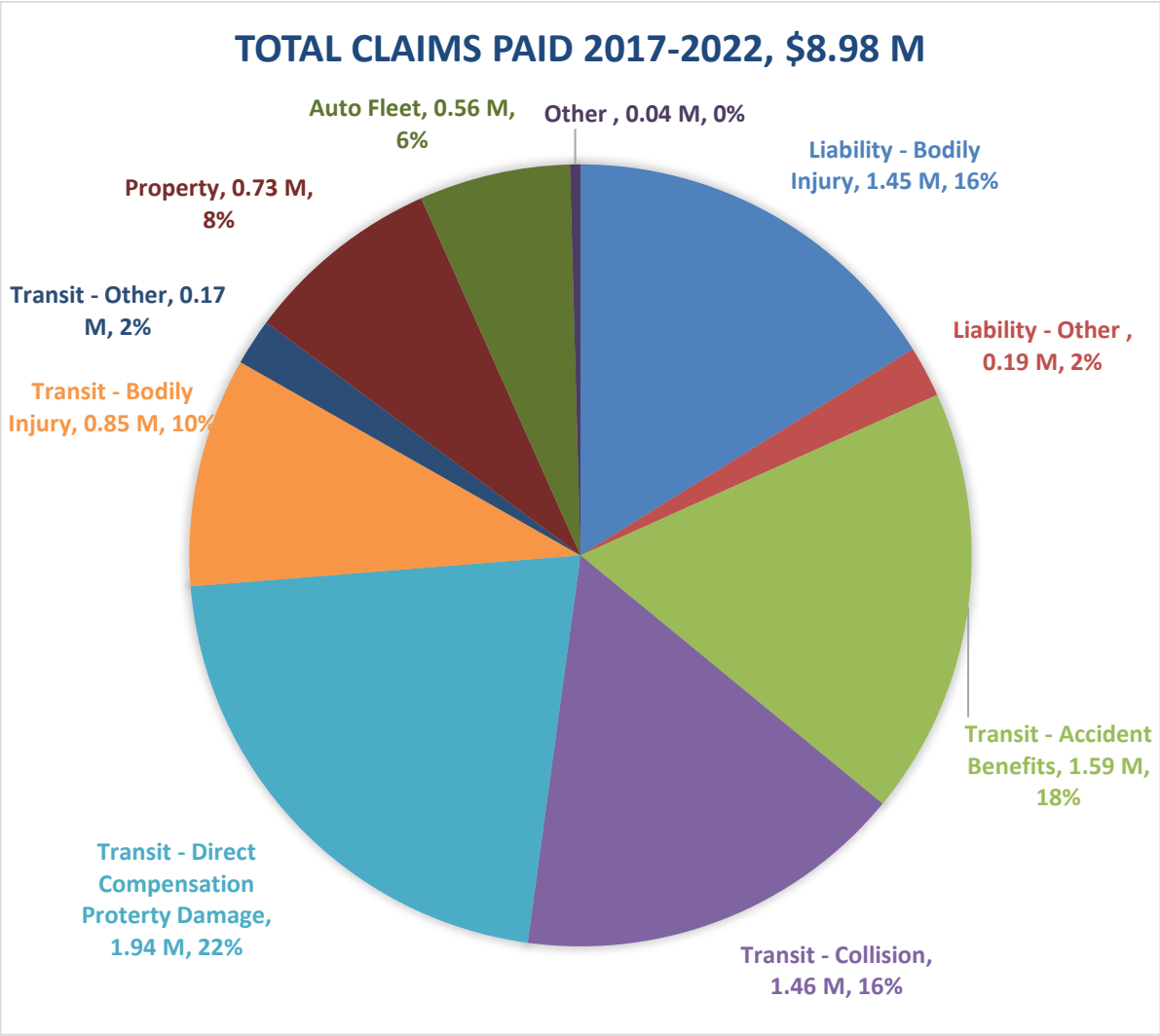
2.0 Background, Objectives, and Scope

The following chart shows the number of claims, claims costs, and insurance premiums paid by the City of Brampton between 2017 and 2021.



2.0 Background, Objectives, and Scope

Between 2017 and 2021, Transit claims accounted for 67% of the value of the claim paid. The following chart shows the major claim categories by the value of claims paid between 2017 and 2021.



## 2.0 Background, Objectives, and Scope

### Objectives

This engagement aimed to assess the effectiveness and efficiency of the existing control framework to determine the adequacy of internal controls to ensure compliance with policies, procedures, and legislation related to the City of Brampton insurance and claims management program.

### Scope

The audit included a review of internal controls and processes for claims and risk management, specifically those relating to the following:

- Claims administration
- Annual insurance policy renewal process
- Monitoring of third-party service providers
- Risk management practices and procedures relevant to the administration of the insurance program
- Use of information system to efficiently and effectively manage the claims

The audit covered January 1st, 2017, to December 31st, 2021.

### *Scope Limitations*

The scope of our review excluded the following insurance program not managed by IRM:

- Insurance provided through employee benefits, which is managed by the Human Resources Department and outsourced to third parties
- Insurance related to Workplace Safety and Insurance Board (WSIB) which the Ontario Government administers

### 3.0 Detailed Audit Findings and Proposed Management Actions

Ref #	Audit Findings	Finding Rating	Audit Recommendations	Management Response and Due Date	Responsible Party
1	<p><u>Certificates of Insurance are not properly recorded and tracked to ensure the vendor has adequate insurance coverage to protect the City</u></p> <p>Approximately 56% of all active contracts on file had expired COIs on file. Having an expired COI on file does not necessarily mean the vendor has not renewed their insurance. In some cases, vendors may have an updated COI but have not uploaded the renewed COI into the City's digital procurement system. Without a current COI on file, the City would not know if the vendor carries valid insurance.</p> <p>The City of Brampton requires its suppliers, vendors and contractors to provide a Certificate of Insurance (COI) as proof of insurance coverage to protect the City from potential claims resulting from the actions, activities, and conduct of its suppliers, vendors, and contractors. A COI is issued by an insurance company or broker and verifies the existence of an insurance policy with the City of Brampton and that the City is added as an insured party. The vendor has the responsibility to provide a valid COI before the start of their contract with the City, and annually upon insurance renewal. The Contract Administrators are required to ensure that all COIs are up to date.</p>	P1	<ol style="list-style-type: none"> <li>1. It is recommended that IRM work with Purchasing Department and CAO's Office to clearly define roles and responsibilities in ensuring Certificate of Insurance for vendors are reviewed periodically and kept up-to-date at all times.</li> <li>2. It is recommended that IRM should periodically prepare aging reports of delinquent COI and forward them to the respective division heads for follow-up with contract administrators.</li> <li>3. It is recommended that the Purchasing Division should ensure that the expired Insurance Report is accurate and free from duplicate or erroneous entries.</li> </ol>	<p>Risk Management will work with Purchasing, responsible Contract Administrators and other relevant departmental staff to review all expired COIs and ensure updated COIs are obtained and/or uploaded to the City's digital procurement system.</p> <p>1. Risk Management will be working with Purchasing and other relevant divisions to develop a City-wide SOP regarding the COI requirements and process, which will include periodic reviews by Risk Management to ensure the requirement for Contract Administrators and/or Vendors to obtain and upload COIs to Bids &amp; Tenders occurs as required. In addition, Risk Management will work with the Purchasing division with respect to COI training in connection with the Bids &amp; Tenders operation. The</p>	Manager, Risk & Insurance.

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	<p><u>Process overview:</u></p> <ul style="list-style-type: none"> <li>IRM reviews and approves the amounts and type of insurance coverage that a vendor must have to protect the City against any claims arising from the vendor's conduct. The amount and type of insurance coverage depend on the scope and nature of the work.</li> <li>IRM also reviews the actual Certificate of Insurance to ensure that the vendor has obtained adequate coverage and meets or exceeds the IRM's recommendations.</li> <li>The vendor is required to maintain active insurance coverage for the entire duration when the contract is active. Since the COI has an expiry date, the vendor must provide a renewed COI with extended validity to prove continued insurance coverage for as long as the contract is active.</li> <li>Automatic reminder emails are sent to vendors 30 days before the COI expires. If no renewal COI has been received by the expiry date, a 2<sup>nd</sup> automated email reminder is sent to the vendor advising them of non-compliance with their contractual agreements and that their work, and payments for their work may be suspended.</li> </ul> <p><u>Findings:</u></p>			<p>new SOP will also address the specific recommendations identified by Internal Audit in this Report.</p> <p>Expected Completion: Q2 2023</p> <p>2. Refer to response #1. 3. Refer to response #1.</p>	



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	<p>As of April 12th, 2022, out of 674 active contracts on file, 377 (or 56%) active contracts were showing as having expired COIs.</p> <p>Samples were also taken of COIs relating to 30 active contracts with contract values ranging from \$64,000 to \$41.8 million, issued between 2017 and 2021. We noted that 60% (18 out of 30) of the sampled active contracts had expired COIs on file. This is in line with the data analysis where 56% of all active contracts appear to have expired COIs on file.</p> <p>To summarize, there are a few potential issues that contributed to a high percentage of expired COIs on file:</p> <ul style="list-style-type: none"> <li>• Vendors did not upload the renewed insurance certificates and Contract Administrators did not follow up to ensure that the COI was uploaded in the digital procurement system.</li> <li>• In some cases, system design limitations caused COIs to be counted as expired even though replacement COIs may have already been uploaded. According to the Purchasing group, at renewal, if the insurance certificate type selected does not match with the original COI type in the digital procurement system (Bids &amp; Tenders), the system will still show the insurance as expired. For example, an original COI with Auto and General liability coverage may be replaced with two separate COIs providing the same</li> </ul>				

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	<p>coverage upon renewal. In such cases, the original COI will continue to show as expired.</p> <ul style="list-style-type: none"> <li>• In addition, some completed contracts may not be closed within the system, inflating the number of expired insurance certificates.</li> <li>• There are no clearly defined roles and responsibilities among the City divisions on who is responsible for checking and following up on insurance renewals. Currently, it is unclear whose job it is to ensure that current and valid COIs are on file and uploaded onto the digital procurement system. Also, there is no standard operating procedure for dealing with outdated COIs.</li> </ul> <p><u>The importance of having valid COIs on file</u></p> <p>The vendor insurance provides the financial backing for the indemnification provisions that the vendors have agreed to. For example, if a vendor is small, it may not have the funds to pay for a large claim and it might declare bankruptcy without insurance. With an updated COI on file, the City can report the matter to vendor's insurers as the City is included as the "additional insureds" on the vendor's policy. Therefore, it is important to have valid and current COIs on file for all active contracts.</p> <p>According to management, however, none of the 1625 claims, received between 2017 and 2021, involved a situation where the City had</p>				

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	<p>to accept liability and pay a claim because of an expired COI. Management also indicated that the contracts have indemnification provisions so regardless of whether or not the City has undated COI on file, vendors are still legally obligated to defend and indemnify the City. This means vendors would be directly exposed to liability for any claims arising from their work for the City.</p> <p><u>Potential exposure</u></p> <p>Expired COIs expose the City to liability risks as many of these expired certificates pertain to active contracts. Currently, it is unclear which division is responsible for ensuring the periodical and timely review and renewal of vendor COIs. Implementing the recommendations will help mitigate the risk of liability and potential financial losses to the City.</p>				
2	<p><u>Risk evaluations not completed in the last few years</u></p> <p>Although not mandatory, risk evaluations of City properties may provide additional risk mitigation and improvement opportunities if the City opts to conduct insurance risk evaluations.</p> <p>The risk evaluation reports seek to identify potential risks and risk improvement opportunities in the following areas:</p>	P2	<ol style="list-style-type: none"> <li>1. Given that no Risk Evaluation has been completed in the last nine years, it is recommended that the IRM actively engage MARSH Canada to conduct a comprehensive Risk Evaluation to identify any deficiencies that may exist. Further, the Risk Evaluations of the City properties should be conducted periodically.</li> <li>2. Ensure that the respective divisions resolve deficiencies</li> </ol>	<ol style="list-style-type: none"> <li>1. We have engaged Marsh Risk Consulting this year, and Risk evaluations for the City's largest two recreation centers, Gore Meadows and Cassie Campbell are scheduled for October 2022, with two additional evaluations to take place early in 2023.</li> </ol>	<p>Manager, Risk &amp; Insurance.</p> <p>Facilities Managers responsible for rectifying deficiencies.</p>

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	<ul style="list-style-type: none"> <li>• Fire protection and property loss prevention</li> <li>• Other property exposures</li> <li>• Safety and liability</li> <li>• Crime prevention and security</li> <li>• Facility and property maintenance</li> <li>• Environmental hazards</li> </ul> <p>Risk evaluations are not mandatory. However, they are considered a best practise as they help identify building issues which could result in claims, and make recommendations to reduce the likelihood or the severity of such claims. For example, issues with sprinkler systems, fire alarms, plumbing deficiencies, lighting, etc. Risk evaluations are helpful in risk reduction, but are not mandatory. For example, if a claim arose in a building that had not been inspected lately; the insurance coverage would still be available to the City.</p> <p>Typically, the insurer initiates such inspections to get a better understanding of the risks it is covering. The City can also voluntarily request such inspections to identify and fix deficiencies to reduce the likelihood of claims.</p> <p>Each year the IRM renews its insurance policies. At the time of policy renewal, the coverage is reviewed in detail, keeping in mind the changes that have happened since the last review. The process involves collecting information from the divisions, highlighting any potential exposures for the insurance company to consider before underwriting the new policy. Risk evaluations of City properties can be a</p>		identified on the risk evaluation report.	<p>2. Agreed.</p> <p>Due date-Q1 2023, to allow for receipt and actioning of the Risk Evaluation Reports.</p>	

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	<p>useful addition to the City's risk mitigation strategy.</p> <p><u>Findings:</u></p> <p>According to the Acting Manager, Risk &amp; Insurance, the Risk Inspections have not been done since 2014.</p> <p>Before 2014, the then City-insurer, OMEX (the Ontario Municipal Insurance Exchange), and its broker Marsh Canada Limited had conducted limited risk inspections of certain facilities, which included the following:</p> <p><b>2013:</b> City Hall, Civic Centre, Transit - Clark, South Fletcher's Sportsplex, and Rose Theatre</p> <p><b>2014:</b> Cyril Clark Library and Loafers Lake Recreation Center</p> <p>In 2015, the City moved its insurance program to JLT (a broker) which did not offer these property inspections, so no risk evaluations were completed for a number of years.</p> <p>The IRM staff is not aware of any <u>facility inspections</u> being completed since leaving OMEX, i.e. switching the insurer. More recently, AVIVA has conducted a detailed review of Fleet Auto Operations. The staff is not aware of or able to locate any documentation or recommendations due to these reviews. However, staff recall the insurer was satisfied with all the information, documentation and responses provided by Fleet Operations staff to their questions about the City's Fleet Training &amp; Operations. The</p>				

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	<p>staff is unaware of and has not been able to locate a report or any major recommendations issued by the insurer arising from this review or whether the involved departments implemented these recommendations.</p> <p>In 2021, the City moved its insurance program to MARSH. No risk evaluations of City properties have been completed by MARSH since their new contract came into effect in 2021.</p> <p>Although not mandatory, the City should periodically obtain risk evaluations of City properties, specifically public-use properties, to identify any operational and risk management deficiencies that should be remediated to prevent, control, and contain various risks.</p> <p><u>Potential exposure</u></p> <p>Without periodic risk evaluations, the City may not be aware of deficiencies and may be exposed to certain risks. Any deficiencies that are identified but not remediated timely may also increase the insurance premiums.</p>				
3	<p><u>Annual reports have not been prepared since 2018</u></p> <p>It has been a practice at the IRM to prepare an annual report outlining the key performance information and an overview of activities completed by the department and submit them</p>	P2	<p>1. IRM should consider preparing a comprehensive report for the periods 2019 to 2021. Thereafter, it is recommended that the annual reports be prepared and submitted to the Committee on a regular basis.</p>	<p>1. Agreed. We will resume comprehensive annual reports. The next report will also cover 2019 to 2021.</p> <p>Due Date: End of Q2 2023</p>	Manager, Risk & Insurance.

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	<p>to the Committee of Council. The annual report provides information on insurance claims experienced during the year. The information includes an outline of claims received, denied or closed, open claims and files handled by IRM to recover damage costs to City property caused by third parties (i.e. subrogation), and risk management initiatives undertaken by IRM.</p> <p>However, the last annual report was submitted to the Committee of Council in 2018. No further annual reports have been submitted to the Committee since then.</p> <p>The reporting of performance and activities annually is a practice that supports good governance.</p> <p><u>Potential exposure</u></p> <p>Without annual reports being prepared, Council may be made aware of any major claims or exposures to the City in addition to the progress made with respect to major initiatives.</p>				
4	<p><u>Key Performance Indicators (KPIs not available for prior years)</u></p> <p>Performance measurement is an ongoing process of collecting data and key indicators that measure progress towards achieving objectives in the business planning process. It</p>	P2	<p>1. Review the KPIs to ensure that all aspects of KPIs are clearly defined (e.g. description, frequency of reporting, data requirement, ownership, and targets) and are directly tied to specific business objectives.</p>	<p>1. Insurance &amp; Risk Management (IRM) began working with Organizational Performance (OP) on performance measurement approximately 1 year</p>	Manager, Risk & Insurance

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	<p>is an unbiased tool using quantitative information to tell a fact-based story.</p> <p>The unit has only recently started tracking the performance information from the beginning of 2022. At this point, no data on the unit's performance is available. The first set of KPI reports will be available at the end of 2022.</p> <p>Following are some of the KPIs:</p> <table><tr><th>Performance Measures</th></tr><tr><td>Number of Claims open/closed</td></tr><tr><td>Number of Subrogation claims open/closed</td></tr><tr><td>Number of Certificate of Insurance (COI) reviews</td></tr><tr><td>Number of contract/agreement reviews</td></tr><tr><td>Number of site inspections</td></tr><tr><td>Claims Settlement expenditures</td></tr><tr><td>Legal fees expenditures</td></tr><tr><td>Subrogation recovery (dollar value)</td></tr><tr><td>Cost of Risk per \$1000 in Revenue</td></tr><tr><td>Percent of claims settlements avoided</td></tr><tr><td>Percent of claims meeting required response times</td></tr></table> <p><u>Potential Exposure</u></p> <p>Inadequate KPI reporting may result in sub-optimal assessment of the Insurance &amp; Risk</p>	Performance Measures	Number of Claims open/closed	Number of Subrogation claims open/closed	Number of Certificate of Insurance (COI) reviews	Number of contract/agreement reviews	Number of site inspections	Claims Settlement expenditures	Legal fees expenditures	Subrogation recovery (dollar value)	Cost of Risk per \$1000 in Revenue	Percent of claims settlements avoided	Percent of claims meeting required response times		<p>2. Where possible, the KPIs should also include benchmarking with other municipal corporations.</p> <p>3. KPIs on insurance training provided by the unit to City staff should be included in the annual KPI report.</p> <p>4. An analysis of KPIs should be included in the annual report.</p>	<p>ago, and as a result has developed the KPI's listed on the "Performance Measures" chart. We have been collecting the data monthly since January 1st, 2022. OP has asked us to report annual figures. We will also conduct a review of KPI's to ensure we track those that add value and eliminate any that create unnecessary work, while providing little or no real value.</p> <p>2. We agree that benchmarking with other municipalities is preferable, but in working with OP, we discovered that most such data is unavailable; however we will benchmark where possible.</p> <p>3. Agreed-we will document and record any insurance and risk training we provide to City staff.</p> <p>4. Agreed. This will be included in our annual reports.</p>	
Performance Measures																	
Number of Claims open/closed																	
Number of Subrogation claims open/closed																	
Number of Certificate of Insurance (COI) reviews																	
Number of contract/agreement reviews																	
Number of site inspections																	
Claims Settlement expenditures																	
Legal fees expenditures																	
Subrogation recovery (dollar value)																	
Cost of Risk per \$1000 in Revenue																	
Percent of claims settlements avoided																	
Percent of claims meeting required response times																	



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	Management Department against goals and objectives.			As end of year figures will be required, we suggest a due date of end of Q1, 2023.	
5	<p><u>Trust fund expenditure details submitted by the external adjuster as part of the trust fund reconciliation are not periodically verified by staff for accuracy and supporting evidence</u></p> <p>COB uses an external insurance adjusting firm, Crawford &amp; Company, to handle accident benefit claims. Since this area of litigation and insurance is heavily regulated, a significant amount of paperwork and accident benefit claims processing work is involved. COB funds the trust accounts with Crawford &amp; Company, which are used for paying accident benefits. When the funds are running low, the external adjuster submits the trust fund reconciliation along with a detailed transaction report of expenses paid to claimants for each claim and also an invoice requesting for additional funds for replenishing the trust fund. Currently, the staff do not perform a detailed review of transactions on the expense report to verify accuracy and supporting evidence.</p> <p><u>Potential exposure</u></p> <p>Lack of review of transaction on the expense report may lead to errors, omissions, and inappropriate or unauthorized use of funds by the external adjuster to be undetected.</p>	P2	<p>1. It is recommended that IRM establish a Standard Operating Procedure (SOP) for reviewing trust fund expense reimbursements for accuracy against the supporting evidence, and ensure that staff comply with the SOP.</p>	<p>1. Agreed. IRM will develop an SOP regarding the review and audit of trust fund expenditures by our Independent Adjusters (IA), and will ensure compliance with the SOP.</p> <p>Expected Completion: Q1 2023</p>	Manager, Risk & Insurance.

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6	<p><u>There is no formal quality assurance review process to ensure the accuracy and completeness of claims files</u></p> <p>Based on the discussions with staff, an informal quarterly review is conducted to:</p> <ol style="list-style-type: none"> <li>1. Ensure that all claims are receiving attention</li> <li>2. Check for accurate financials (payments and reserves)</li> <li>3. Discuss amongst adjusters and Risk Manager any claims which require action</li> </ol> <p>Following are some of the issues we noted:</p> <p>We noted that in the RiskMaster system, which holds data on claims, there were 21 claims with event cause description as 'No details provided.' According to staff, IRM has no control over what claimants or their lawyers put in their claim notices to the IRM. As a result, the IRM often receives vague or limited information. In such cases, "No details provided" is selected as a "Cause Code." Assigning a "Cause Code" is mandatory to set up the claim. However, the "Cause Code" is not updated in the RiskMaster once more information is available.</p> <p>We reviewed a listing of 1,625 claims with a value of \$14.8 million (including the reserve amounts for open claims). We noted four open claims in 2021 with no reserve amounts. There</p>	P2	<ol style="list-style-type: none"> <li>1. It is recommended that a monthly or quarterly quality assurance review of insurance claims files (both electronic and paper files) be conducted on a sample basis.</li> <li>2. RiskMaster file status should be updated for all significant events. A case synopsis should also be prepared and periodically updated in RiskMaster.</li> </ol>	<ol style="list-style-type: none"> <li>1. IRM practice is to conduct quarterly staff claims reviews. IRM will ensure future reviews address the specific findings of IA in this Report, including reviewing our claims with an eye to quality control; ensuring information is up to date, claims are moving towards conclusion and claims payments are appropriate.</li> </ol> <p>Due Date: Q1 2023</p> <ol style="list-style-type: none"> <li>2. File status is currently required to be updated as developments occur. Claims synopsis is typically updated if and when a file enters litigation. For large losses, we will ensure an updated synopsis is entered every 6 months.</li> </ol> <p>Due Date: Q1, 2023</p>	Manager, Risk & Insurance.

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	<p>were 21 claims with an event cause description of "No details provided."</p> <p>We noted that the system allows default values to be overridden and claims are not numbered sequentially and can be manually overridden. While we did not note any duplicate claims, the system does not prevent the entry of duplicate claims.</p> <p>Overall, the exceptions noted were not significant. However, a formal quality assurance process will provide an added assurance on the accuracy and completeness of claims files.</p> <p><u>Potential exposure</u></p> <p>A lack of a formal quality assurance review exercise may result in undetected errors and omissions.</p>				

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