



## Memorandum

**To:** Swati Sharma  
Acting Chief Financial Officer

**From:** Stephen Lord   
Assistant Inspector General, Audits

**Date:** February 12, 2019

**Subject:** Engagement Memo—Controls Over Medical Payments to Healthcare Facilities (Project code 005-2019)

We are initiating an audit of Amtrak's controls over its medical claim payments for agreement employees. Our objective is to assess the effectiveness of the company's controls to mitigate the risk of fraud in claims for medical services provided by healthcare facilities, such as ambulatory surgery centers, independent laboratories, and durable medical equipment suppliers. This is a follow-on to our prior audit which focused on individual health care providers. We may expand our scope or modify our objective during the audit.

During the audit, we plan to analyze documents and data related to medical claim payments, interview company officials and third-party claim administrators, and review relevant information related to the management of fraud risk in processing of medical claim payments. We also will work to minimize the impact of the audit by coordinating document requests, interviews, and observations with staff in advance.

Our work will be performed in accordance with generally accepted government auditing standards. Our interactions with the company will be consistent with P/I2.1.3, which sets forth the relationship between our office and the company. In particular, section 7.0 of the policy discusses coordination between company officials and our office of audits. To view this policy, see <http://wiki.corp.nrpc/display/APIM20/2.0+Inspector+General>

We request that your office arrange an entrance conference for us with the appropriate company officials at the earliest possible date. We will keep you advised of the status of our work and any material changes in our objective, should they occur.

Alejandra Rodriguez will be the audit manager for this engagement and reports to Vijay Chheda, Senior Director – Audits. If you have any questions, please contact me at (202) 906-4600 ([stephen.lord@amtrakoig.gov](mailto:stephen.lord@amtrakoig.gov)), Jason Venner, Deputy Assistant Inspector General – Audits at (202) 906-4405 ([jason.venner@amtrakoig.gov](mailto:jason.venner@amtrakoig.gov)), or Vijay Chheda at (202) 906-4661 ([vijay.chheda@amtrakoig.gov](mailto:vijay.chheda@amtrakoig.gov)).

cc: Stephen Gardner, Sr. Executive Vice President, Commercial Marketing & Strategy  
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