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Correspondence Memorandum

Date: November 13, 2020
To: Audit Committee
From: Michelle Hoehne
 Office of Internal Audit (OIA)
Subject: StayWell Audit

This memo is for Audit Committee review and discussion. No action is required.

StayWell is the third-party administrator for the State’s wellness program. ETF retained Segal Consulting to perform an analysis of StayWell’s wellness incentive processing and payment procedures and a review of performance guarantees for calendar years 2017-2019.

Segal’s review identified areas for improvement, including identification of 10 overpayments and errors in StayWell’s performance guarantee calculations. Two of the overpayments will be credited to ETF; StayWell disputes the others based on eligibility coverage date data they received. Segal noted that a StayWell automated eligibility reconciliation process, implemented in 2020, should relieve the eligibility date issue, if executed correctly. ETF and Staywell will review the performance guarantee calculation errors to ensure appropriate penalties were assessed.


As a result of the issues identified, Segal recommended that Staywell:

- keep an ongoing, detailed record of each performance guarantee and wellness benefit payment for ease of tracking and audit;
- perform monthly reconciliation and audits on performance guarantee data; and
- increase the frequency of StayWell’s internal audits.

Attached is the information provided to the Group Insurance Board for their November 18, 2020 meeting, including a memo from Molly Heisterkamp, ETF Disease Management and Wellness Program Manager, as well as Segal’s report. Molly will be at the Audit Committee meeting to discuss the results of the review and answer any questions.

Attachment: Segal Audit on StayWell Contract; includes

- Memo to GIB
- Segal Consulting’s Final Audit Report

Reviewed and approved by Yikchau Sze, Director, Office of Internal Audit

 Electronically Signed 11/20/20

Board	Mtg Date	Item #
AUD	12.09.20	4A



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Correspondence Memorandum

Date: October 20, 2020
To: Group Insurance Board
From: Molly Heisterkamp, Disease Management & Wellness Program Manager
 Office of Strategic Health Policy
Subject: Segal Audit on StayWell Contract

This memo is for informational purposes only. No Board action is required.

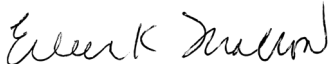
The Wisconsin Department of Employee Trust Funds (ETF) contracted with Segal Consulting to conduct an audit of StayWell's administration of wellness incentive processing and payments and performance metric calculations for January 1, 2017 through December 31, 2019. Segal's final report, which includes StayWell's response, is attached for reference.

Wellness Incentive Processing and Payment

Segal audited the accuracy of incentive payments for a random sample of 150 payments from 2019 and 100 targeted payments from 2017 and 2018. They did not find any errors in the statistical sample of 150 wellness incentive payments.

Segal identified 10 overpayments and one tax processing error in the 100 targeted payments sample. Two of the overpayments were related to duplicate member payments. StayWell identified a system issue where two members were inadvertently issued a second physical gift card. Both StayWell and ETF were aware of this system issue at the time. Other duplicate payments had been credited to ETF in 2019; however, these two individuals were missed. StayWell is issuing a credit for these two payments on the next invoice and will be auditing all payments to ensure there were no additional duplicate payments.

Eight other overpayments were related to eligibility coverage discrepancies. StayWell attests that these members completed incentive activities prior to their eligibility coverage end dates. Discrepancies between the coverage dates, according to Segal and StayWell, may be due to delays in system updates from an employer, ETF, or StayWell. Starting in 2020, StayWell has automated its daily eligibility file loading process. The one tax processing issue was related to FICA tax being withheld from a retiree's incentive payment. Upon further review, it was identified that this was done correctly, and the error was removed.

Reviewed and approved by Eileen K Mallow, Director, Office of Strategic Health Policy  Electronically Signed 11/4/20

Board	Mtg Date	Item #
GIB	11.18.20	7A

Performance Metrics Review

Segal reviewed performance metrics reported by StayWell against the raw data presented by StayWell for the health assessment portal survey, helpline survey, lifestyle management survey, participant onsite screening survey, disease management health coaching survey, telephone response time, first call resolution, and call abandonment rate. There were 22 instances out of approximately 776 with a variance greater than 1% between Segal's calculation of the raw data and StayWell's calculation, as reported to ETF. StayWell has confirmed the errors, stating they were caused by manual calculations and processes. StayWell is completing an internal audit on other reports already submitted in 2020 to ensure accuracy and will explore ways to automate calculations to remove the possibility for manual error going forward. ETF and StayWell will review the 22 variance instances to ensure appropriate penalties were assessed.

A few performance guarantees related to behavior change could not be evaluated because minimum participation criteria/assumptions for the calculations to be applicable were not met.

One performance guarantee, written inquiry response, was not tracked by StayWell from 2017 through 2019. However, they implemented written inquiry response tracking for 2020.

Conclusion

The audit findings presented a few areas for improvement. Two overpayments were identified and will be credited to ETF. StayWell is reviewing all performance metrics to ensure manual errors do not occur going forward. They will also perform their own internal audits more regularly. ETF does not believe any of the findings are an obstacle to continuing to work with StayWell.

Attachment: Segal Consulting's Final Audit Report



State of Wisconsin Department of Employee Trust Funds
**Analysis of StayWell Wellness Benefit
Processing and Payment Procedures
& Performance Guarantee Review –
Final Report**

For the Period of January 1, 2017 through December 31, 2019

October 16, 2020 / Amber M. Turner, MBA, PMP / Connie Yu

StayWell Wellness Benefit and Performance Guarantee Audit

Section I – Executive Summary	1
Scope of Services.....	1
Statistical Results	2
Target Sample Results	2
Performance Guarantee Review	3
Key Findings and Recommendations.....	3
Section II – Statistical Wellness Benefit Payment Sample	8
Stratification Table.....	8
Review Process.....	9
Statistical Error Results	9
Turnaround Time	9
Section III – Target Wellness Benefit Payment Sample	10
Target Error Table	10
Section IV - Performance Guarantee (PG) Review	15
Surveys.....	15
Health Coaching Behavior Change	30
Call Center Performance	32
Performance Guarantees unable to be measured	36
Section VI – StayWell’s Response to Draft Report	37

Section I – Executive Summary

This report analyzes and evaluates StayWell’s administration of the processing and payment procedures as well as the performance guarantee performance of the State of Wisconsin Department of Employee Trust Funds’ (the “State’s”) group wellness benefit program. Amber Turner and Connie Yu of Segal’s Benefit Audit Solutions Practice conducted the remote review of a total of 250 wellness benefit payments.

Scope of Services

StayWell provided an electronic data file of all wellness benefits processed and paid during the 36-month audit period of January 1, 2017 through December 31, 2019. The objective of the review was to ensure wellness benefits were paid in accordance with the State’s contract with StayWell. Segal’s audit included the following in-house and remote review components:

1. An adjudication procedures review questionnaire was provided to StayWell to assess day-to-day processing guidelines and wellness benefit control measures;
2. A random, stratified sample of 150 wellness benefit submissions from January 1 through December 31, 2019 to measure validity in the financial dollar value and incidence (number) accuracy of all benefit payments processed during the audit period;
3. A 100 target wellness benefit submissions selection from January 1, 2017 through December 31, 2019 identified through an electronic analyses designed to explore potential duplicate payments, wellness benefit payments not presented in StayWell’s file and/or sample various benefit applications; and,
4. An assessment of the Performance Guarantee Performance data to measure reported performance guarantees against raw data.

The auditors completed a form for each sampled wellness benefit submission serving as the primary documentation on which this report is based. To maintain participant confidentiality, wellness benefit payments addressed within this report are referred to as “Worksheets”. These worksheets (1–150) are distinguished with an alphabet character (A-B) that identifies the respective payment tier in the statistical analysis. The auditors reviewed each wellness benefit submission from receipt to release for check disbursement to identify any variances in procedures and benefit determination.

Worksheets T1–T100, include a “T” to distinguish the “target” sampling of wellness benefit submissions identified through electronic analyses. These wellness benefit payments were reviewed for the attribute selected for validation (e.g., duplicate payment, benefit provision, etc.). Due to the focused review and selection of these wellness benefit payments, they are excluded from the overall calculation of processing performance.

Statistical Results

Industry standards are developed through ongoing review and comparison of measures utilized by major carriers and third-party administrators (“TPAs”) nationwide. Standards include acceptable performance levels for administration of fully-insured, self-insured, corporate, public, and multi-employer plan benefits.

During the 12-month period of January 1, 2019 through December 31, 2019, a total of 48,817 wellness benefit payments were made, totaling \$7,251,385.48 (amount does not include FICA deduction). This amount did not include \$4,454.84 missing from the StayWell file for the 2019 calendar year. Sampled payments for 150 stratified wellness benefit payments totaled \$22,270.40 (amount does not include FICA deduction).

The stratified audit sample was selected through analyses performed by actuarial staff to provide statistical validity in both the dollar value and incidence of errors. The statistical sample was expected to identify less than a 3% error rate, which would then provide a 93% confidence level with $\pm 3\%$ precision.

A basic principle of the sampling technique is that the stratified audit findings are representative of all wellness benefit payment; therefore, the respective strata error rate is used to project the total errors for each stratum. The total projected errors are used to calculate the statistical accuracy levels for comparison to performance guarantees and industry standards.

The statistical sample of 150 wellness benefit payments did not present any errors. As illustrated in the chart below, StayWell met each of the industry standards for accuracy based on statistical (random) sampling.

Category	Statistical Achievement	Industry Standards
Financial Accuracy (dollar value)	100.00%	99.00%
Payment Accuracy (free from financial error)	100.00%	97.00%
Procedural Accuracy (free from processing error)	100.00%	95.00%
Overall Processing Accuracy (free from error)	100.00%	95.00%

Turnaround time could not be measured as the information regarding when the benefit information was entered into the system was not provided.

Target Sample Results

StayWell supported an additional sample of 100 wellness benefit payments selected through a series of electronic analyses to identify and confirm the accuracy of specific plan provisions and exclusions.

Segal’s selection focused on single benefit payments and patterns that would present the greatest financial risk to the Plan. Wellness benefit payments were sampled from the following categories:

- Duplicate benefit submission analysis;
- Reimbursement;
- Benefit submissions that were not presented by StayWell but found in the State's benefit submission file;
- Eligibility; and,
- Plan variables not represented in the random selection.

The auditors manually reviewed the electronic results and the participant history for the sampled wellness benefit submissions via remote review in order to validate the processing event or identify the root cause of the error, as applicable. Of the 100 target wellness benefit submissions, 10 issues were identified: 10 overpayments, corresponding to an amount of \$1,500.00, were attributed to eligibility update issues and duplicate payments. Further detail is provided in Section III of this report.

Performance Guarantee Review

Performance guarantee data was collected and measured against the raw data that was provided by StayWell from 2017 to 2019. From the documentation and data provided by StayWell, Segal recalculated the performance results and confirmed 22 performance guarantee calculations were not aligned with the results StayWell presented to the State by 1 or more percentage points. A summary of these findings can be found within the next section (Key Findings and Recommendations).

More detail regarding the performance guarantee review is enclosed in Section IV of this report.

Key Findings and Recommendations

The following bullet points summarize the primary review findings identified by Segal's auditors during the review with recommendations, as indicated. StayWell was presented with a draft report on August 14, 2020 for its review and comment. Their formal response was received on October, 1, 2020 and portions of the response are paraphrased in italics throughout this report; their entire response is included in Section VI.

- **The stratified, random sample of 150 wellness benefit submissions did not uncover any errors.**
- **The target sample review discovered 10 findings: 10 overpayments in the amount of \$1,500.00 due to eligibility update issues and duplicate claims.**

Segal recommends the State confirm with StayWell that StayWell will pursue recovery efforts on wellness benefit submissions found in error on the target samples.

StayWell agreed to three (3) errors and noted two of the samples, which were duplicate submissions, were credited back to the State in June 2019. The other sample (T97) was noted as a processing error as the FICA deduction was not applied to the benefit.

Upon the State reviewing this report it was indicated it is the State's intent to apply FICA based on the status of the member when the benefit payment is dispersed and not when the activity was completed. As such, the procedural error on sample T97 is removed.

The remaining errors were presented as eligibility errors. Although the State submits an eligibility file on a daily basis, StayWell is delayed in uploading and updating the eligibility information.

The State currently provides StayWell with three (3) business days to upload and update the eligibility information.

Segal recommends the State discuss with StayWell the eligibility file update process and StayWell provide an improvement plan to the State.

Staywell disagreed with the eligibility errors and noted in all cases that the activity date was verified and the activity was completed prior to the eligibility end date. StayWell maintains that the dates provided through Segal's eligibility file do not match the participants dropped file they receive from the State.

Segal notes that the eligibility file that was used was provided by the State and was used to determine eligibility.

StayWell notes that prior to 2020, eligibility reconciliation was a manual process. Effective starting January 2020, the process is automated and is completed on a daily basis. The file is retrieved from the secure FTP and loaded into the StayWell system.

Segal agrees that an automated process, when executed correctly, is the appropriate course of action to relieve the eligibility delay issue.

➤ **Performance Guarantee Review**

From the documentation and data provided by StayWell, Segal confirmed the following performance guarantees were not aligned with the results StayWell presented to the State by 1 or more percentage points. Performance guarantee penalties were not in place in 2017 but were tracked and monitored.

StayWell stated that out of approximately 776 quarterly performance guarantee calculations, 21 examples of variances were provided, which is a 2.7% variance rate (note: it is unknown how many calculations were checked by Segal).

Segal notes that each calculation was reviewed in this section by quarters. In addition to the initial review, a peer review of the calculations was made to ensure the accuracy of reporting. Segal maintains the calculations were completed correctly with the information StayWell provided to Segal. Segal has also provided three (3) examples to StayWell, upon request, to show examples of the variations.

Upon further requested examination, StayWell notified Segal and the State there were a small number of errors in their calculations, either due to an excel formula or manual re-typing of the data. StayWell noted they will be making efforts to refine the process going forward.

The State noted they will work with StayWell to review the financial penalties assessed from 2018 and 2019 based on Segal's calculation and make any necessary corrections going forward. Additionally, the State will be requesting StayWell update their process for calculating performance standards prior to calculating performance penalties for 2020.

Details of the performance guarantees variance review are as follows:

- **Health Assessment Portal Survey**

Segal's Report	StayWell's Report
2018, Q1, 90.0%	2018, Q1, 91.0%

- **Helpline Survey**

Segal's Report	StayWell's Report
2019, Q2, 95.0%	2019, Q2, 93.6%
2018, Q2, 93.0%	2018, Q2, 91.5%

- **Lifestyle Management Survey - Online**

Segal's Report	StayWell's Report
2019, Q1, 86.2%	2019, Q1, 84.4%
2019, Q4, 86.0%	2019, Q4, 88.4%
2018, Q1 97.3%	2018, Q1, 89.6%
2018, Q2 89.4%	2018, Q2, 81.7%
2018, Q3 81.1%	2018, Q3, 64.3%
2018, Q4, 81.2%	2018, Q4, 74.6%
2017, Q4, 88.6%	2017, Q4, 86.3%

- **Participant Onsite Screening Survey**

Segal's Report	StayWell's Report
2017, Q1, No Data Provided	2017, Q1, 92.9%
2017, Q2, 93.8%	2017, Q2, 95.8%

- **Disease Management Health Coaching Survey**

Segal's Report	StayWell's Report
2019, Q4, 98.3%	2019, Q4, 93.9%

- **Telephone Response Time**

Segal's Report	StayWell's Report
2019, Q2, 85.5%	2019, Q1, 91.0%

Segal's Report	StayWell's Report
2019, Q3, 67.7%	2019, Q3, 65.6%
2018, Q2, 80.8%	2018, Q2, 85.5%
2018, Q3, 75.3%	2018, Q3, 80.1%
2017, Q3, 86.6%	2017, Q3, 88.6%
2017, Q4, 90.9%	2017, Q4, 88.8%

- **First Call Resolution**

Segal's Report	StayWell's Report
2017, Q1, 96.1%	2017, Q1, 94.3%

- **Call Abandonment Rate**

Segal's Report	StayWell's Report
2019, Q2, 3.6%	2019, Q2, 1.6%
2019, Q3, 7.4%	2019, Q3, 6.2%

➤ **The following performance guarantees could not be measured.**

- Event Scheduling – According to StayWell, “each biometric event, which is in form of a survey, is issued prior to the actual event request and is sent out once a year prior to the year beginning”.
- Written Inquiry Responses – This performance guarantee was not being tracked by StayWell for the period of review. According to the State, StayWell started tracking the written inquiry responses in Quarter 3 of 2020.

StayWell stated that they capture all written inquiries by scanning and saving the mailed piece in the system. The StayWell account team responds to inquiries within a few business days. If StayWell is unable to resolve an issue, the issue is brought back to the State and clarification is requested. StayWell always addresses participant inquiries/issues as soon as they are received and will start documenting this via Excel immediately.

- Population Lifestyle Management – The participation assumption was not met, therefore the performance guarantee cannot be measured.
- Telephonic Health Coaching Group - The participation assumption was not met, therefore the performance guarantee cannot be measured.
- Behavioral Health Tobacco Cessation - The participation assumption was not met, therefore the performance guarantee cannot be measured.

The State and StayWell regularly discuss performance guarantees and make adjustments as necessary as witnessed through the performance standards appendix.

➤ **The State is completing a performance guarantee review on a quarterly basis.**

- **Segal recommends StayWell keep an ongoing, detailed record of each performance guarantee and wellness benefit payment for ease of external audit functions. Keeping ongoing detailed records will also assist in the State's tracking of performance guarantees and wellness benefit payments going forward.**
- **Segal recommends StayWell make efforts to reconcile and perform audits on the performance guarantee raw data against the reported amount on a monthly basis. This will help to align the raw data with the performance guarantee for proof of process.**
- **According to the adjudication procedures review, StayWell performs internal audits on an annual basis. Segal recommends these audits occur in a more frequent manner (e.g., monthly/quarterly).**

Section II – Statistical Wellness Benefit Payment Sample

StayWell provided a data file of all wellness benefit payments processed and paid during the 36-month audit period of January 1, 2017 through December 31, 2019. For the statistical sample, wellness benefit payments for January 1 through December 31, 2019 were utilized for sampling purposes. In 2019 a total of 48,817 wellness benefit payments were made totaling \$7,251,385.48 (amount does not include FICA deduction of \$71,164.52). This amount did not include \$4,454.84 missing from the StayWell file for the 2019 calendar year. Sampled benefit payments for 150 stratified benefit payments totaled \$22,270.40 (amount does not include FICA deduction of \$229.60). Relevant wellness benefit payments processing information was verified through StayWell’s responses to Segal’s Adjudication Questionnaire, remote review discussions, auditors’ observations, and the individual wellness benefit payments review.

Stratification Table

The selection of 150 wellness benefit payments were stratified by dollar amount in order to provide large wellness benefit payments representation that is more valid in determining financial accuracy levels. The methodology of our stratified selection process utilizes a formula designed to take full advantage of statistical sampling procedures that allows a quantifiable degree of confidence, whereby results obtained in the audit sample are a true reflection of the way all wellness benefit payments were processed during the audit period.

A basic principle of the sampling technique is the premise that stratified audit findings are representative of all wellness benefit payments; therefore, the respective strata error rate is used to project the total errors for each stratum. The total projected errors are used to calculate the statistical accuracy levels for comparison to industry standards.

Strata	Dollar Range of Strata	Number of Wellness Benefit Payments in		Dollar Amount in	
		Range	Selection	Selection	Strata
A	\$0.01 - \$139.99 Retiree Benefit	6,199	20	\$2,770.40	\$858,685.48
B	\$140.00 - \$150.00 Active Benefit	42,618	130	\$19,500.00	\$6,392,700.00
Total		48,817	150	\$22,270.40	\$7,251,385.48

Review Process

StayWell provided a copy of the sampled wellness benefit payment submissions and screenshots for each selected payment in their wellness benefit payment system for the auditors' reference. Each wellness benefit submission was manually processed from initial receipt to final benefit determination seeking evidence of compliance with established adjudication procedures and plan provisions; each participant's wellness benefit submission history was reviewed to confirm proper application of benefit maximums. In addition to verifying the amount paid, evidence of the following processing tasks was explored.

- Wellness Benefit submissions were paid only on behalf of eligible individuals based on records contained in the benefit payment system.
- Documentation was on file for wellness benefit submissions and verified when necessary.
- Duplicate wellness benefit submissions were properly denied.
- Arithmetic calculations were correct.
- All activities to achieve the wellness benefit payment were completed.
- Member was eligible to receive benefits per comparison to the eligibility file provided by the State.

All questions and potential errors were presented to StayWell's remote review representatives daily; additional supporting documentation was provided through July 7, 2020.

Statistical Error Results

The sample of 150 random sample wellness benefit submissions did not identify any errors.

Turnaround Time

Turnaround time could not be measured as the information regarding when the benefit information was entered into the system was not provided.

StayWell requested information regarding this observation.

Segal notes that the claim file provided by StayWell did not include the receive date of the last activity; therefore, the turnaround time for payment could not be measured.

Section III – Target Wellness Benefit Payment Sample

Segal performed an electronic review of all wellness benefit submissions processed and paid during the audit period (January 1, 2017 through December 31, 2019). Our electronic review was designed to identify potential deficiencies in the benefit delivery system; however, our analysis was not expected to identify data entry errors.

The random nature of statistical sampling does not ensure every benefit provision or plan variation was identified in the selection. Therefore, our electronic analyses included exploration of scenarios that could suggest a systematic error in programming and/or administrative procedures with focus given to patterns suggesting a greater financial impact to the Plan. Our query process was defined by the following categories:

- Duplicate wellness benefit submission analysis;
- Reimbursement;
- Wellness benefit submissions that were not presented by StayWell but found in the State's benefit submission file;
- Eligibility; and,
- Plan variables not represented in the random selection.

The State's contract with StayWell served as our references for the electronic analyses. Electronic reports provided a list of suspected errors that required the auditor's manual review to refine the analysis and identify any patterns of concern; a selection of wellness benefit submissions were chosen to confirm suspected errors and identify appropriate query revisions.

The remote review of target wellness benefit submissions focused on the attribute(s) selected to gain confidence and to understand how a change in query programs could present more accurate results (e.g., minimize the number of false-positives evidenced in such electronic reviews).

Of the 100 wellness benefit submissions targeted through electronic analyses, 89 were supported by benefit documentation, confirmation of Program intent, and/or explanation of established administrative procedures.

Target Error Table

The sample of 100 wellness benefit submissions identified 11 findings: 10 overpayments in the amount of \$1,500.00 due to eligibility update issues and duplicate claims. StayWell should discuss recovery efforts with the State.

Target Sample Errors		
Worksheet	Overpayment	Explanation
T2	\$150.00	Duplicate payments for wellness benefit submissions were made.
T3	\$150.00	<p>StayWell's system did not make a redemption selection, therefore the member was inadvertently issued a physical gift card.</p> <p>Segal noted StayWell should discuss this scenario with the State and come up with a workaround to double check payments.</p> <p><i>StayWell stated that these two claims were brought to the State's attention on May 29, 2019 and credits were provided on the June 2019 invoice.</i></p> <p>Confirmation from the State was received that the credits did not apply. Upon request, StayWell researched the credits and found they were not applied.</p> <p><i>StayWell noted they will apply the credits as soon as possible.</i></p>
<p>Due to delayed eligibility updates, card payments were issued for members who were not eligible for the wellness benefit card payment.</p> <p><i>StayWell noted, although the State issues the updated eligibility file on a daily basis, there is a delay in processing the eligibility status updates on StayWell's side. The State allows three (3) business days for an eligibility update.</i></p> <p>Segal recommends the State discuss with StayWell the eligibility file update process and StayWell provide an improvement plan to the State. The following errors were assessed for the next section of this table.</p> <p><i>StayWell disagreed with the following errors and noted that in all cases, the activity date was verified and the activity was completed prior to the eligibility end date. StayWell maintains that the dates provided through Segal's eligibility file do not match the participants dropped file that they receive from the State.</i></p> <p>Segal notes that the eligibility file that was used was provided by the State and was used to determine eligibility.</p> <p><i>StayWell notes that prior to 2020, the eligibility reconciliation was a manual process. Effective starting January 2020, the process is automated and is completed on a daily basis. The file is retrieved from the secure FTP and loaded into the StayWell system.</i></p> <p>Segal agrees that an automated process, when executed correctly, is the appropriate course of action to relieve the eligibility delay issue.</p>		

Target Sample Errors		
Worksheet	Overpayment	Explanation
T8	Eligibility Dates: 1/1/2015 – 2/28/18	Eligibility Issue.
	Last Activity Completed: 4/9/2018	
	\$150.00	
T12	Eligibility Dates: 1/1/2016 – 6/30/2018	Eligibility Issue.
	Last Activity Completed: 7/6/2018	
	\$150.00	
T14	Eligibility Dates: 2/1/2016 – 7/31/2018	Eligibility Issue.
	Last Activity Completed: 12/20/2018	
	\$150.00	
T16	Eligibility Dates: 1/1/2016 – 1/31/2018	Eligibility Issue.
	Last Activity Completed: 3/2/2018	
	\$150.00	
T24	Eligibility Dates: 2/1/2016 – 9/30/2018	Eligibility Issue.

Target Sample Errors		
Worksheet	Overpayment	Explanation
	Last Activity Completed: 10/9/2018 \$150.00	
T26	Eligibility Dates: 2/1/2017 – 4/30/2018 Last Activity Completed: 6/14/2018 \$150.00	Eligibility Issue.
T69	Eligibility Dates: 08/1/2001 – 9/30/2017 Last Activity Completed: 10/12/2017 \$150.00	Eligibility Issue.
T98	Eligibility Dates: 1/1/2016 – 6/30/2019 Last Activity Completed: 8/9/2019 \$150.00	Eligibility Issue.
T97	Eligibility Retiree Status Change: 7/1/2019 Last Activity Completed: 6/28/2019 State Intent Confirmed	<p>The member called inquiring about the wellness benefit payment status. The member indicated she was a retiree and consequently, the payment was made at a retiree level. As these activities were completed prior to the status change (from active status to retiree status), the member should have not been subject to a FICA deduction (\$11.48).</p> <p><i>StayWell agreed with this processing error per their October 1, 2020 response.</i></p> <p><i>Upon the State reviewing this report it was indicated it is the State's intent to apply FICA based on status of the member</i></p>

Target Sample Errors		
Worksheet	Overpayment	Explanation
		<i>when the benefit payment is dispersed and not when the activity was completed. As such, this error is removed.</i>
Total	10 overpayments	\$1,500.00

Section IV - Performance Guarantee (PG) Review

Segal reviewed performance guarantees against the supporting raw data that was presented by StayWell. Three (3) of the performance guarantees (population-level lifestyle management behavior change, telephonic health coaching group lifestyle management behavior change, and health coaching behavioral change: tobacco cessation) could not be evaluated as the State did not meet the criteria assumptions for these performance guarantees.

One (1) performance guarantee (written inquiry response) was not being tracked. Segal notified the State and confirmed with the State that StayWell will track this performance guarantee going forward.

StayWell stated that they capture all written inquiries by scanning and saving the mailed piece in the system. The StayWell account team responds to inquiries within a few business days. If StayWell is unable to resolve an issue, the issue is brought back to the State and clarification is requested. StayWell always addresses participant inquiries/issues as soon as they are received and will start documenting this via Excel immediately.

StayWell stated that out of approximately 776 quarterly performance guarantee calculations, 21 examples of variance were provided, which is a 2.7% variance rate (note: it is unknown how many calculations were checked by Segal).

Segal notes that each calculation was reviewed in this section by quarters. In addition to the initial review, a peer review of the calculations was made to ensure the accuracy of the reporting. Segal maintains the calculations were completed correctly with the information StayWell provided to Segal. Segal has also provided examples to StayWell upon request to show examples of the variations.

Upon further requested examination, StayWell notified Segal and the State there were a small number of errors in their calculations, either due to an excel formula or manual re-typing of the data. StayWell noted they will be making efforts to refine the process going forward.

The State noted they will work with StayWell to review the financial penalties assessed from 2018 and 2019 based on Segal's calculation and make any necessary corrections going forward. Additionally, the State will be requesting StayWell update their process for calculating performance standards prior to calculating performance penalties for 2020.

The following sections include the performance guarantee calculation outcomes.

Surveys

Per the contract language: The contractor shall achieve a ninety five percent (95%) satisfaction rate on all surveys prior to March 12, 2018, and ninety percent (90%) satisfaction rate after March 12, 2018. \$2,500 per quarter is at risk. Performance penalties were not assessed in the calendar year of 2017.

Conducting Surveys

StayWell is conducting the surveys below on an ongoing basis.

Health Assessment Portal

Survey presented on eight (8) questions regarding service provided through the health assessment portal. The assessment is based on the following questions:

1. Your experience completing the health assessment.
2. Your experience navigating StayWell Portal.
3. The length of time it took you to complete the health assessment.
4. The usefulness of your health assessment results.
5. Logging in to the StayWell Portal.
6. Navigating the StayWell Portal.
7. Completing the health assessment.
8. Understanding your health assessment results.

The results for each calendar year are displayed in the charts below:

2019 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2019	93.5%	94.0%	94.1%	93.3%
Pass/Fail	Pass	Pass	Pass	Pass
StayWell Report	93.7%	93.9%	94.1%	93.3%
Overall CY 2019	93.7%			

2019 - Percentage by Question

Question	1	2	3	4	5	6	7	8
Quarter 1	94.1%	89.7%	95.6%	92.2%	93.0%	89.7%	96.2%	97.4%
Quarter 2	94.1%	91.1%	95.6%	92.6%	93.8%	91.3%	96.1%	97.2%
Quarter3	94.5%	91.8%	95.4%	93.3%	94.0%	90.4%	96.5%	97.1%
Quarter 4	94.4%	89.7%	94.6%	94.0%	92.9%	89.3%	94.6%	96.6%

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2018	90.0%	91.8%	88.4%	90.4%

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Pass/Fail	Pass	Pass	Fail	Pass
StayWell Report	91.0%	91.7%	88.4%	90.4%
Overall CY 2018	90.2%			

2018 - Percentage by Question

Question	1	2	3	4	5	6	7	8
Quarter 1	88.7%	86.5%	92.9%	85.7%	92.1%	87.2%	92.3%	94.6%
Quarter 2	92.7%	88.9%	94.7%	93.3%	91.1%	86.6%	92.0%	95.1%
Quarter3	89.4%	82.9%	89.0%	91.1%	88.0%	81.7%	89.2%	95.6%
Quarter 4	92.6%	85.8%	91.4%	94.1%	89.8%	81.2%	92.1%	95.9%

2017 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2017	92.7%	94.3%	91.6%	89.5%
No PG in place	N/A	N/A	N/A	N/A
StayWell Report	92.6%	93.7%	91.5%	89.5%
Overall CY 2017	92.0%			

2017 - Percentage by Question

Question	1	2	3	4	5	6	7	8
Quarter 1	91.0%	90.0%	94.7%	91.3%	92.6%	89.6%	94.5%	97.5%
Quarter 2	95.1%	91.2%	97.1%	93.8%	93.7%	90.9%	96.1%	96.9%
Quarter3	92.2%	88.3%	95.5%	90.8%	89.2%	88.5%	93.8%	94.6%
Quarter 4	90.4%	85.9%	92.6%	91.6%	86.2%	84.9%	89.8%	94.8%

Helpline Survey

The survey presented five (5) questions regarding services provided to users of the helpline. The assessment is based on the following questions:

1. Overall experience with your HelpLine representative.
2. Ease of accessing the HelpLine.
3. Courtesy of the HelpLine representative.
4. HelpLine representative's ability to answer your question.
5. Amount of time it took to get your question answered/issue resolved.

The results for each calendar year are displayed in the charts below:

2019 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2019	90.4%	95.0%	94.7%	93.7%
Pass/Fail	Pass	Pass	Pass	Pass
StayWell Report	90.3%	93.6%	94.5%	93.5%
Overall CY 2019	93.5%			

2019 - Percentage by Question

Question	1	2	3	4	5
Quarter 1	88.9%	93.7%	95.2%	86.2%	88.1%
Quarter 2	95.3%	95.9%	97.8%	92.6%	93.7%
Quarter 3	94.9%	94.9%	97.6%	93.5%	92.4%
Quarter 4	92.8%	95.3%	97.3%	91.3%	91.7%

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2018	88.6%	93.0%	94.1%	91.4%
Pass/Fail	Fail	Pass	Pass	Pass
StayWell Report	88.6%	91.5%	93.7%	91.4%
Overall CY 2018	91.8%			

2018 - Percentage by Question

Question	1	2	3	4	5
Quarter 1	86.5%	91.1%	93.1%	85.8%	86.5%
Quarter 2	92.4%	95.2%	97.1%	90.4%	90.1%
Quarter 3	93.5%	95.6%	97.5%	91.6%	92.0%
Quarter 4	90.1%	93.9%	96.4%	89.3%	87.5%

2017 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2017	92.9%	92.1%	95.5%	92.2%
No PG in place	N/A	N/A	N/A	N/A

2017 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
StayWell Report	92.9%	92.2%	95.5%	92.2%
Overall CY 2017	93.2%			

2017 - Percentage by Question

Question	1	2	3	4	5
Quarter 1	92.3%	95.0%	97.9%	90.3%	89.0%
Quarter 2	90.9%	93.6%	96.3%	90.5%	89.5%
Quarter 3	94.7%	95.9%	98.1%	94.6%	94.1%
Quarter 4	90.7%	94.0%	95.6%	90.0%	90.9%

Lifestyle Management Survey- Paper

The survey presented 15 questions regarding services provided through the Lifestyle Management. The assessment is based on the following questions:

1. Overall quality of the Health Coaching program.
2. Length of coaching calls.
3. Number of coaching calls.
4. Overall satisfaction with your Health Coach.
5. How working with your Health Coach helps you manage your health.
6. Ease of understanding the recommendations made by your Health Coach.
7. How well the StayWell program addresses your specific health-related needs.
8. Ease of connecting with your Health Coach.
9. The quality of the educational materials you received.
10. Your overall health.
11. Your ability to manage your health.
12. Your ability to identify and evaluate resources to assist you with your health.
13. Your ability to effectively deal with obstacles to improve your health.
14. Your ability to achieve a health-related goal.
15. Would you participate in a similar program.

StayWell met the performance guarantees for this survey. The results for each calendar year are displayed in the charts below:

2019 Overall Performance Per Quarter*				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2019	91.7%	N/A	N/A	N/A
Pass/Fail	Pass	N/A	N/A	N/A
StayWell Report	91.7%	N/A	N/A	N/A
Overall CY 2019	91.7%			

* Note there were only 2 participants in the first quarter of 2019 for the calendar year.

2018 Overall Performance Per Quarter*				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2018	N/A	N/A	N/A	96.4%
Pass/Fail	N/A	N/A	N/A	Pass
StayWell Report	N/A	N/A	N/A	96.4%
Overall CY 2018	96.4%			

* Note there were only 3 participants in the fourth quarter of 2018 for the calendar year.

2017 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2017	100.0%	98.3%	97.0%	100.0%
No PG in place	N/A	N/A	N/A	N/A
StayWell Report	100.0%	98.3%	97.0%	100.0%
Overall CY 2017	98.8%			

2017 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4
Question 1	100.0%	99.0%	100.0%	100.0%
Question 2	100.0%	99.1%	90.5%	100.0%
Question 3	100.0%	100.0%	95.0%	100.0%
Question 4	100.0%	98.1%	95.5%	100.0%
Question 5	100.0%	97.9%	95.0%	N/A
Question 6	100.0%	98.2%	100.0%	100.0%
Question 7	100.0%	97.0%	95.2%	100.0%
Question 8	100.0%	99.0%	95.2%	100.0%
Question 9	100.0%	97.6%	100.0%	N/A
Question 10	100.0%	98.6%	100.0%	100.0%
Question 11	100.0%	100.0%	100.0%	100.0%
Question 12	100.0%	100.0%	100.0%	N/A

Quarter	Q1	Q2	Q3	Q4
Question 13	100.0%	100.0%	100.0%	N/A
Question 14	100.0%	98.9%	100.0%	100.0%
Question 15	100.0%	90.6%	88.9%	100.0%

Lifestyle Management Survey - Online

The survey presented eight (8) questions regarding services provided through the Lifestyle Management. The assessment is based on the following questions:

1. How likely is it that you would recommend StayWell health coaching to a friend or colleague?
2. How satisfied or dissatisfied are you with your overall health coaching experience?
3. How satisfied or dissatisfied are you with the convenience of coaching calls?
4. How satisfied or dissatisfied are you with your health coach?
5. Would you recommend your health coach to a colleague?
6. How do you feel about the length of health coaching call(s)?
7. Do you intend to continue participating in the health coaching program?
8. If you are no longer working with your health coach, would you participate in a similar program again?

The results for each calendar year are displayed in the charts below:

2019 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2019	86.2%	92.3%	95.1%	86.0%
Pass/Fail	Fail	Pass	Pass	Fail
StayWell Report	84.4%	81.1%	83.7%	88.4%
Overall CY 2019	89.9%			

2019 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Quarter 1	8	100.0%	100.0%	100.0%	88.8%	66.6%	87.5%	66.6%
Quarter 2	9.3	100.0%	95.0%	100.0%	95.0%	70.0%	93.3%	92.3%
Quarter3	8.1	98.2%	98.3%	98.2%	94.5%	96.9%	93.8%	100.0%
Quarter 4	9.3	88.8%	87.5%	88.8%	88.8%	66.6%	88.8%	85.7%

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2018	97.3%	89.4%	81.1%	81.2%
Pass/Fail	Pass	Fail	Fail	Fail
StayWell Report	89.6%	81.7%	64.3%	74.6%
Overall CY 2018	87.2%			

2018 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Quarter 1	9.5	100.0%	100.0%	100.0%	83.3%	100.0%	100.0%	100.0%
Quarter 2	8.6	90.4%	95.4%	95.0%	78.2%	89.4%	85.7%	95.0%
Quarter3	8.5	93.7%	94.4%	88.8%	57.8%	73.3%	66.6%	88.2%
Quarter 4	8.4	88.8%	88.8%	87.5%	66.6%	75.0%	71.4%	87.5%

2017 Overall Performance Per Quarter				
Performance Guarantee CY	Q1*	Q2	Q3	Q4
2017	N/A	88.3%	82.2%	88.6%
No PG in place	N/A	N/A	N/A	N/A
StayWell Report	N/A	88.3%	83.1%	86.3%
Overall CY 2017	86.4%			

*No data was presented in Quarter 1

2017 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Quarter 1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Quarter 2	9	100.0%	66.6%	100.0%	100.0%	50.0%	100.0%	100.0%
Quarter3	7.8	80.0%	88.8%	88.8%	80.0%	66.6%	75.0%	100.0%
Quarter 4	9.3	91.6%	100.0%	100.0%	91.6%	58.3%	88.8%	85.7%

Participant Onsite Screening Survey

The survey data presented eight (8) questions regarding services provided through the Participant Screening program. The assessment is based on the following questions:

1. Overall on-site screening experience.
2. Professionalism of the screening staff.

3. Knowledge of the screening staff.
4. Explanation and consultation you received on your screening values.
5. Experience scheduling your screening appointment.
6. Screening appointment starting on time.
7. Was the total amount of time allowed for your screening appointment too much, about right, or not enough?
8. In the future would you recommend this type of health screening to others?

The results for each calendar year are displayed in the charts below:

2019 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2019	99.7%	99.7%	99.7%	99.6%
Pass/Fail	Pass	Pass	Pass	Pass
StayWell Report	99.5%	99.6%	99.6%	99.5%
Overall CY 2019	99.7%			

2019 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Quarter 1	100.0%	100.0%	100.0%	99.9%	98.7%	N/A	99.6%	99.8%
Quarter 2	99.9%	99.9%	100.0%	99.9%	98.5%	N/A	99.7%	99.8%
Quarter3	100.0%	99.9%	99.9%	99.9%	98.8%	N/A	99.7%	99.8%
Quarter 4	99.9%	99.9%	100.0%	99.7%	97.9%	N/A	99.9%	99.8%

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2018	98.8%	99.3%	99.5%	99.0%
Pass/Fail	Pass	Pass	Pass	Pass
StayWell Report	99.4%	99.4%	99.6%	99.2%
Overall CY 2018	99.1%			

2018 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Quarter 1	98.3%	99.9%	99.9%	99.9%	100.0%	93.0%	99.3%	100.0%
Quarter 2	98.1%	99.9%	100.0%	100.0%	100.0%	96.7%	99.6%	100.0%
Quarter3	98.2%	99.8%	100.0%	100.0%	100.0%	98.7%	99.8%	99.9%

Quarter 4	97.7%	99.9%	99.9%	99.9%	99.8%	95.3%	99.5%	99.7%
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2017 Overall Performance Per Quarter*				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2017	N/A	93.8%	97.6%	97.4%
No PG in place	N/A	N/A	N/A	N/A
StayWell Report	92.9%	95.8%	97.6%	97.5%
Overall CY 2017	96.2%			

*No data submitted for Q1 in 2017 and limited data submitted for Q2.

2017 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Quarter 1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Quarter 2	94.7%	94.7%	100.0%	100.0%	94.4%	88.2%	84.2%	100.0%
Quarter3	98.4%	98.4%	98.8%	97.7%	93.7%	96.6%	99.3%	97.9%
Quarter 4	97.8%	95.7%	97.8%	97.8%	97.8%	96.7%	97.9%	98.9%

Disease Management Health Coaching Survey

The survey presented 15 questions regarding services provided through the Disease Management Health Coaching. The assessment is based on the following questions:

1. Overall quality of the Health Coaching program.
2. Length of coaching calls.
3. Number of coaching calls.
4. Overall satisfaction with your Health Coach.
5. How working with your Health Coach helps you manage your health.
6. Ease of understanding the recommendations made by your Health Coach.
7. How well the StayWell program addresses your specific health-related needs.
8. Ease of connecting with your Health Coach.
9. The quality of the educational materials you received. If you did not receive any materials, please select the "Not Applicable" response.
10. Your overall health.

11. Your ability to manage your health.
12. Your ability to identify and evaluate resources to assist you with your health.
13. Your ability to effectively deal with obstacles to improve your health.
14. Your ability to achieve a health-related goal.
15. In the future would you participate in a similar program?

StayWell met the performance guarantees for this survey. The results for each calendar year are displayed in the charts below:

2019 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2019	99.2%	98.5%	97.7%	98.3%
Pass/Fail	Pass	Pass	Pass	Pass
StayWell Report	98.9%	97.8%	98.6%	93.9%
Overall CY 2019	98.4%			

2019 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4
Question 1	98.7%	99.0%	96.7%	100.0%
Question 2	98.7%	95.5%	100.0%	83.3%
Question 3	100.0%	98.4%	96.0%	100.0%
Question 4	100.0%	99.5%	100.0%	100.0%
Question 5	100.0%	98.5%	96.6%	100.0%
Question 6	100.0%	99.5%	96.7%	100.0%
Question 7	100.0%	97.9%	96.6%	100.0%
Question 8	97.4%	99.0%	92.3%	100.0%
Question 9	100.0%	100.0%	100.0%	100.0%
Question 10	100.0%	96.4%	94.1%	100.0%
Question 11	100.0%	100.0%	100.0%	100.0%
Question 12	100.0%	100.0%	100.0%	100.0%
Question 13	98.4%	100.0%	100.0%	100.0%
Question 14	95.5%	100.0%	100.0%	100.0%
Question 15	100.0%	93.9%	96.0%	100.0%

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2018	99.2%	98.5%	96.7%	98.4%

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Pass/Fail	Pass	Pass	Pass	Pass
StayWell Report	99.2%	98.5%	97.2%	98.4%
Overall CY 2018	98.2%			

2018 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4
Question 1	100.0%	98.6%	96.3%	100.0%
Question 2	100.0%	97.9%	96.2%	100.0%
Question 3	100.0%	98.6%	97.5%	100.0%
Question 4	100.0%	99.3%	97.4%	100.0%
Question 5	100.0%	98.5%	93.4%	91.7%
Question 6	100.0%	99.3%	100.0%	100.0%
Question 7	100.0%	97.8%	94.6%	92.9%
Question 8	87.5%	94.9%	96.1%	100.0%
Question 9	100.0%	100.0%	95.5%	100.0%
Question 10	100.0%	97.4%	96.3%	100.0%
Question 11	100.0%	99.0%	98.4%	100.0%
Question 12	100.0%	100.0%	98.2%	100.0%
Question 13	100.0%	99.0%	96.5%	100.0%
Question 14	100.0%	99.1%	100.0%	100.0%
Question 15	100.0%	97.6%	94.3%	91.7%

2017 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2017	N/A	96.8%	99.0%	97.3%
No PG in place	N/A	N/A	N/A	N/A
StayWell Report	N/A	96.8%	99.0%	97.3%
Overall CY 2017	97.7%			

*No data submitted for Q1 in 2017

2017 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4
Question 1	N/A	95.0%	100.0%	97.2%
Question 2	N/A	100.0%	100.0%	97.2%
Question 3	N/A	95.0%	100.0%	97.2%
Question 4	N/A	100.0%	100.0%	94.9%

Question 5	N/A	100.0%	100.0%	97.1%
Question 6	N/A	95.0%	100.0%	97.4%
Question 7	N/A	94.4%	100.0%	97.2%
Question 8	N/A	100.0%	92.9%	97.1%
Question 9	N/A	100.0%	100.0%	100.0%
Question 10	N/A	100.0%	100.0%	100.0%
Question 11	N/A	100.0%	100.0%	100.0%
Question 12	N/A	92.9%	100.0%	100.0%
Question 13	N/A	91.7%	100.0%	100.0%
Question 14	N/A	93.8%	100.0%	96.7%
Question 15	N/A	94.4%	91.7%	87.1%

Screening Site Coordinator Survey

The survey presented 17 questions regarding services provided through the Screening site survey. The assessment is based on the following questions:

1. Overall performance.
2. Responsiveness - Understands and responds to your needs.
3. Professionalism - Demonstrates tact and respect in working with you.
4. Timeliness - Work is delivered according to documented project deadlines.
5. Problem Identification - Able to identify and assess problems.
6. Problem-Solving - Quickly identifies potential solutions to problems.
7. Communication - Effectively communicates with you.
8. Flexibility - Demonstrates willingness to accommodate your organization's needs.
10. Overall on-site health screening event.
11. Professionalism of the screening staff.
12. Knowledge of the screening staff.
13. Quality of service provided at the screening stations.
14. Flow of the event.
15. Amount of supplies provided.
16. On-site health screening event starting on time.
17. In the future would you recommend StayWell's screening services to other organizations like yours?

StayWell met the performance guarantees for this survey. The results for each calendar year are displayed in the charts below:

2019 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2019	96.2%	99.0%	99.6%	93.0%
Pass/Fail	Pass	Pass	Pass	Pass
*StayWell Report	N/A	N/A	N/A	N/A
Overall CY 2019	97.0%			

*Information presented from StayWell was not broken down per quarter.

2019 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4
Question 1	92.9%	100.0%	100.0%	92.9%
Question 2	92.9%	98.2%	100.0%	92.9%
Question 3	92.9%	98.4%	100.0%	92.3%
Question 4	92.9%	100.0%	98.1%	92.9%
Question 5	92.9%	100.0%	100.0%	92.3%
Question 6	92.9%	100.0%	98.0%	92.3%
Question 7	92.9%	96.4%	100.0%	92.9%
Question 8	92.9%	97.1%	97.1%	92.3%
Question 9	92.9%	98.2%	100.0%	92.9%
Question 10	100.0%	100.0%	100.0%	92.9%
Question 11	100.0%	96.5%	100.0%	90.9%
Question 12	100.0%	100.0%	100.0%	92.3%
Question 13	100.0%	98.6%	100.0%	92.9%
Question 14	100.0%	100.0%	100.0%	92.9%
Question 15	100.0%	100.0%	100.0%	92.9%
Question 16	100.0%	100.0%	100.0%	92.9%
Question 17	100.0%	100.0%	100.0%	100.0%

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2018	98.6%	96.6%	98.7%	100.0%
Pass/Fail	Pass	Pass	Pass	Pass
*StayWell Report	N/A	N/A	N/A	N/A
Overall CY 2018	98.5%			

*Information presented from StayWell was not broken down per quarter.

2017 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4
Question 1	97.0%	95.9%	100.0%	100.0%
Question 2	97.0%	98.5%	100.0%	100.0%
Question 3	100.0%	97.1%	100.0%	100.0%
Question 4	94.1%	97.2%	100.0%	100.0%
Question 5	96.8%	96.9%	96.8%	100.0%
Question 6	100.0%	96.9%	96.8%	100.0%
Question 7	96.9%	94.3%	96.3%	100.0%
Question 8	100.0%	95.5%	95.5%	100.0%
Question 9	96.9%	98.4%	100.0%	100.0%
Question 10	100.0%	97.1%	100.0%	100.0%
Question 11	100.0%	94.1%	96.6%	100.0%
Question 12	100.0%	97.0%	100.0%	100.0%
Question 13	100.0%	98.5%	96.6%	100.0%
Question 14	97.2%	95.6%	100.0%	100.0%
Question 15	100.0%	97.1%	100.0%	100.0%
Question 16	100.0%	95.8%	100.0%	100.0%
Question 17	100.0%	97.0%	100.0%	100.0%

2017 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2017	N/A	99.7%	99.1%	97.5%
No PG in place	N/A	N/A	N/A	N/A
*StayWell Report	N/A	N/A	N/A	N/A
Overall CY 2017	98.8%			

* No data submitted for Q1 in 2017

*Information presented from StayWell was not broken down per quarter.

2017 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4
Question 1	N/A	100.0%	100.0%	100.0%
Question 2	N/A	100.0%	100.0%	100.0%
Question 3	N/A	100.0%	100.0%	100.0%
Question 4	N/A	100.0%	100.0%	78.8%
Question 5	N/A	100.0%	96.8%	78.8%
Question 6	N/A	100.0%	100.0%	100.0%
Question 7	N/A	100.0%	96.8%	100.0%
Question 8	N/A	100.0%	100.0%	100.0%
Question 9	N/A	100.0%	100.0%	100.0%
Question 10	N/A	100.0%	97.3%	100.0%

Question 11	N/A	94.6%	97.3%	100.0%
Question 12	N/A	100.0%	100.0%	100.0%
Question 13	N/A	100.0%	97.1%	100.0%
Question 14	N/A	100.0%	100.0%	100.0%
Question 15	N/A	100.0%	100.0%	100.0%
Question 16	N/A	100.0%	100.0%	100.0%
Question 17	N/A	100.0%	100.0%	100.0%

Health Coaching Behavior Change

Health Coaching Behavior Change: Physical Activity (2019)

Under health coaching behavioral change physical activity the performance guarantee is measured on if at least 40% of physical activity coaching participants will increase their frequency of moderate exercise by 30 minutes or more. StayWell met the performance guarantees for this category. The results for the performance guarantee review follows.

2019 Overall Performance	
Overall CY 2019	44.6%
Pass/Fail	Pass
StayWell Report	44.6%

2019 – Amount by Category

Category	Amount
Total participants	157
Showed increase	70
No increase	87

Health Coaching Behavior Change: Stress Management (2019)

Under the health coaching behavioral change stress management, the performance guarantee is measured on if at least 50% of stress management coaching participants will improve their perceived ability to cope with stress. StayWell met the performance guarantees for this category. The results for the performance guarantee review follows.

2019 Overall Performance	
Overall CY 2019	67.9%
Pass/Fail	Pass
StayWell Report	67.5%

2019 – Amount by Category

Category	Amount
Total participants	243
Showed improvement	165
No improvement showed	78

Health Coaching Behavior Change: Healthy Eating (2019)

Under the health coaching behavior change healthy eating, the performance guarantee is measured on if at least 40% of nutritional coaching participants will improve their fruit or vegetable intake by 40%. StayWell met the performance guarantees for this category. The results for the performance guarantee review follows.

2019 Overall Performance		
	Fruits	Vegetables
Overall CY 2019	38.2%	48.2%
Pass/Fail	Pass	
StayWell Report	38.7%	48.4%

2019 – Amount by Category

Category	Fruits	Vegetables
Improved	97	121
Did not Improve	157	130

Health Coaching Behavior Change: Weight Management (2019)

Under the health coaching behavior change weight management, the performance guarantee is measured on if at least 50% of weight management coaching participants will reduce their weight. StayWell met the performance guarantees for this category. The results for the performance guarantee review follows.

2019 Overall Performance	
Overall CY 2019	70.5%
Pass/Fail	Pass
StayWell Report	70.5%

2019 – Amount by Category

Category	Amount
Gained weight - not due to pregnancy	60
Gained weight - weight gain was goal	1
Weight did not change	122
Lost 1-5 pounds	252
Lost 6-10 pounds	109
Lost 11-20 pounds	52

Lost 21-30 pounds	17
Lost 31+ pounds	7
Refused to answer	26

Call Center Performance

The following chart contains the measurements for the call center performance.

Telephone Response Time

Call response time is measured by the amount of time between the time a call is received into a customer service queue and the time the phone is answered by a customer service representative.

The results for each calendar year are displayed in the charts below:

2019 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2019	96.7%	85.8%	67.7%	69.8%
Pass/Fail	Pass	Pass	Fail	Fail
StayWell Report	97.4%	87.6%	65.6%	69.8%
Overall CY 2019	77.2%			

2019 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total Calls	2952	3509	6020	4076
Calls Answered within PG	2829	3010	4075	2845

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2018	92.9%	80.8%	75.3%	64.3%
Pass/Fail	Pass	Fail	Fail	Fail
StayWell Report	92.9%	85.5%	80.1%	64.3%
Overall CY 2018	74.5%			

2018 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total Calls	3124	4416	7363	8999
Calls Answered within PG	2902	3567	5547	5788

2017 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2017	93.7%	95.8%	86.6%	90.9%
No PG in place	N/A	N/A	N/A	N/A
StayWell Report	94.3%	96.8	88.6%	88.8%
Overall CY 2017	90.9%			

2017 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total Calls	3546	3456	6027	8582
Calls Answered within PG	3323	3312	5222	7797

First Call Resolution

The first call resolution is measured by the number of calls that are completed without need for referral or follow-up action divided by the total number of calls received.

The results for each calendar year are displayed in the charts below:

2019 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2019	94.0%	95.3%	96.6%	95.7%
Pass/Fail	Fail	Pass	Pass	Pass
StayWell Report	94.0%	95.3%	96.6%	95.7%
Overall CY 2019	95.4%			

2019 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total calls counted in PG	4997	5519	8788	5784
Number of follow up calls	300	261	296	248
Non-hollow up calls within PG	4697	5258	8492	5536

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2018	95.8%	96.4%	95.4%	95.1%
Pass/Fail	Pass	Pass	Pass	Pass

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
StayWell Report	95.8%	96.4%	95.4%	95.1%
Overall CY 2018	95.7%			

2018 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total calls counted in PG	4978	6276	10325	9773
Number of follow up calls	211	226	471	476
Non-follow up calls within PG	4767	6050	9854	9297

2017 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2017	96.1%	96.6%	98.0%	97.0%
No PG in place	N/A	N/A	N/A	N/A
StayWell Report	94.3%	96.6%	98.0%	97.0%
Overall CY 2017	96.9%			

2017 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total calls counted in PG	3523	5442	8591	12234
Number of follow up calls	136	184	175	370
Non-follow up calls within PG	3387	5258	8416	11864

Call Abandonment Rate

The call abandonment rate is measured by the percentage of calls that are not answered by administrator after thirty (30) seconds (caller hangs up before answer) divided by the number of calls received.

The results for each calendar year are displayed in the charts below:

2019 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2019	1.0%	3.6%	7.4%	9.2%
Pass/Fail	Pass	Pass	Fail	Fail
StayWell Report	0.2%	1.6%	6.2%	9.0%

2019 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Overall CY 2019	5.9%			

2019 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total calls counted in PG	2929	3482	6090	3970
Not answered within PG	28	125	451	367

2018 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2018	0.9%	2.8%	5.9%	4.9%
Pass/Fail	Pass	Pass	Fail	Pass
StayWell Report	0.7%	2.8%	5.4%	5.0%
Overall CY 2018	4.3%			

2018 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total calls counted in PG	3124	4454	7638	9162
Not answered within PG	28	125	451	449

2017 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
2017	0.7%	1.0%	2.3%	1.0%
No PG in place	N/A	N/A	N/A	N/A
StayWell Report	0.7%	1.0%	2.3%	1.0%
Overall CY 2017	1.3%			

2017 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total calls counted in PG	3523	3423	5894	8495
Not answered within PG	23	33	133	87

Performance Guarantees unable to be measured

The following performance guarantees could not be measured.

- Event Scheduling – According to StayWell, *“each biometric event, which is in the form of a survey, is issued prior to the actual event request and is sent out once a year prior to the year beginning”*.
- Written Inquiry Responses – This performance guarantee was not being tracked by StayWell. According to the State, starting in Quarter 3 of 2020 this guarantee is being tracked.
- Population Lifestyle Management – The participation assumption was not met therefore the performance guarantee cannot be measured.
- Telephonic Health Coaching Group - The participation assumption was not met therefore the performance guarantee cannot be measured.
- Behavioral Health Tobacco Cessation - The participation assumption was not met therefore the performance guarantee cannot be measured.

Section VI – StayWell’s Response to Draft Report



WebMD Health Services
2701 NW Vaughn Street, Suite 700
Portland, Oregon 97210
webmdhealthservices.com

October 1, 2020

Molly Heisterkamp
Disease Management & Wellness Program Manager
Strategic Health Policy
Wisconsin Department of Employee Trust Funds
Madison, WI

RE: State of Wisconsin Employee Trust Funds audit performed by Segal Consulting.

Dear Ms. Heisterkamp,

This letter represents StayWell and WebMD’s response to the audit performed by Segal consulting on the wellness program offered by the State of Wisconsin. We very much appreciate the opportunity to engage in and respond to Segal’s audit results.

The Department of Employee Trust Funds (ETF) enlisted Segal to conduct an audit of the Well Wisconsin Program. The audit included the following areas:

1. StayWell provided an electronic data file of all wellness benefits processed and paid during the 36-month audit period of January 1, 2017 through December 31, 2019. The objective of the review was to ensure wellness benefits were paid in accordance with the State’s Plan provisions. Segal’s audit included the following in-house and remote review components:
 - a. An adjudication procedures review questionnaire was provided to StayWell to assess day-to-day processing guidelines and wellness benefit control measures;
 - b. A random, stratified sample of 150 wellness benefit submissions from January 1 through December 31, 2019 to measure validity in the financial dollar value and incidence (number) accuracy of all benefit payments processed during the audit period; A 100 target wellness benefit submissions selection from January 1, 2017 through December 31, 2019 identified through an electronic analyses designed to explore potential duplicate payments, wellness benefit payments not presented in StayWell’s file and/or sample various benefit applications (e.g., deductibles, employee cost-shares, limitations, and exclusions); and,
2. Segal also conducted a performance guarantee review to assess StayWell’s calculations against raw data.

The following bullet points summarize the primary review findings identified by Segal's auditors during the review with recommendations, as indicated.

Wellness Benefit Review

Segal Findings

1. The stratified, random sample of 150 wellness benefit submissions did not uncover any errors and StayWell exceeded industry standards for accuracy.
2. The target sample review discovered 11 findings: 10 overpayments in the amount of \$1,500.00 due to eligibility update issues and duplicate claims and one (1) procedural issue due to FICA deductions.

StayWell Response:

1. Target Wellness Benefit Payment Sample: This should reflect 2 overpayments (T2 & T3) and 1 procedural issue due to FICA deductions (T97). We brought the overpayments (T2 and T3) to ETF's attention on 5/29/2019 and stated our intent to provide a credit on the June 2019 invoice. This credit was in fact issued.
2. Regarding the 8 other overpayments that Segal outlined in the document, in many cases the final eligible date Segal identified does not match when the participants dropped from eligibility files provided by the State of WI. Additionally, these participants were not automatically issued the incentive because they had an eligibility status change prior to the activity participation data getting loaded to the StayWell system (there is a delay in crediting activities for select incentive options, such as screenings). In all cases we verified that activity dates were completed prior to the change in eligible status date, making the participants incentive eligible. The activity dates for these participants reflect the date StayWell manually awarded the activity after verifying that the activity date occurred prior to the separation date, there is one instance in which we contacted the State to approve the appeal and issue the incentive.
3. Prior to 2020 the processing of eligibility files required manual intervention but was completed within the 3 business days required. Effective January 2020, StayWell implemented automatic processing of the eligibility files, further ensuring that if a file is received from WI on the agreed upon cadence (daily on business days), the file will automatically be retrieved from the secure FTP and loaded into the StayWell system.
4. We would like clarification around the following statement: "Turnaround time could not be measured as the information regarding when the benefit information was entered into the system was not provided".

Performance Guarantee Review

Segal Findings

1. Segal provided 21 examples where the variance between their calculation and StayWell's calculation was greater than 1.0 percentage point.

StayWell Response

1. Out of approximately 776 quarterly performance guarantee calculations, 21 examples of variance were provided which is a 2.7% variance rate (note: it is unknown how many calculations were checked by Segal).
2. Of all the variances, 3 made a difference between meeting and not meeting a quarterly PG. Of those, 2 were in StayWell's favor (i.e., StayWell met the PG and wouldn't have needed to pay out) and 1 was in ETF's favor (i.e., StayWell did not meet the PG and should have paid out). From a net perspective, ETF is owed no additional payouts.
3. StayWell is not in agreement with Segal's comment that "performance guarantees were not in place in 2017". All performance guarantees were in place in 2017, and 2017 raw data and calculations were provided to Segal for review. The reason there was not data for onsite screenings in Q1 2017 is because no onsite screenings took place in Q1 2017.
4. Written Inquiry Response performance guarantee: StayWell captures all written inquiries by scanning and saving the mailed piece in the system. The StayWell account team responds to inquiries within a few business days. If StayWell is unable to resolve an issue, the issue is brought back to ETF and clarification is requested. StayWell always addresses participant inquiries/issues as soon as they are received and will start documenting this via Excel immediately.

Summary

StayWell will continue to partner with the State of Wisconsin to track and measure contractual performance guarantees. In addition, we will continue to recommend changes and enhancements to the guarantees to ensure what we are tracking is meaningful. Servicing the State of Wisconsin population is of utmost importance to StayWell.

Sincerely,

Emily Rathjen

Emily Rathjen

Senior Account Executive, StayWell and WebMD Health Services