



STATE OF WISCONSIN
Department of Employee Trust Funds
A. John Voelker
 SECRETARY

Wisconsin Department
 of Employee Trust Funds
 PO Box 7931
 Madison WI 53707-7931
 1-877-533-5020 (toll free)
 Fax 608-267-4549
 etf.wi.gov

Correspondence Memorandum

Date: November 9, 2022

To: Audit Committee

From: Michelle Hoehne, Advanced Auditor
 Office of Internal Audit (OIA)

Subject: Third-Party Administrator (TPA) Contract Compliance Oversight

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

This memo provides an overview of TPA contract compliance oversight completed during Calendar Year (CY) 2022. ETF contracts with various TPAs to administer certain benefit programs or portions thereof. Contract compliance oversight is one component of the Department of Employee Trust Fund’s (ETF) TPA oversight procedures. In carrying out its responsibilities under the International Standards for the Professional Practice of Internal Auditing¹, OIA has an ongoing consulting engagement for TPA oversight as part of the Fiscal Year 2022 – FY 2023 Internal Audit Plan, which includes assisting program staff with certain components of contract compliance oversight and ETF’s annual System and Organization Controls (SOC) 1 report review (Ref. AUD | 9.22.22 | 4).

Overview of Contract Compliance Oversight

ETF program managers have the day-to-day responsibility of TPA oversight and the ongoing management and operation of benefit programs and contracted services. ETF management also engages independent external auditors to review TPA contract compliance. These engagements provide assurance on a TPA’s adherence to contract terms and conditions, as well as compliance with applicable statutes, rules, and regulations. Contract compliance engagements are completed on a periodic basis – annually, biennially, or triennially depending on the nature of the program and perceived

¹ Standard 2050 – Coordination and Reliance: The chief audit executive should share information, coordinate activities, and consider relying upon the work of other internal and external assurance and consulting service providers to ensure proper coverage and minimize duplication of efforts.

Standard 2110 – Governance: The internal audit activity must assess and make appropriate recommendations to improve the organization’s governance processes for coordinating the activities of, and communicating information among, the board, external and internal auditors, other assurance providers, and management.

Reviewed and approved by Yikchau Sze, Director, Office of Internal Audit
 Electronically Signed 11/15/22

Board	Mtg Date	Item #
AUD	12.08.22	5

risks. Results from contract compliance engagements, as well as other external audits, are provided to the board with program oversight responsibility. The results are also shared with the Audit Committee to fulfill its responsibility outlined in the Audit Committee Charter for reviewing the results of external audits.

CY 2022 Contract Compliance Oversight

Throughout the year, OIA has shared the results of the following contract compliance engagements:

- Income Continuation Insurance (CY 2018-2020) – agreed-upon procedures (AUP) engagement included recommendations regarding training and oversight on claims processing, performing internal reviews on a sample of claims and documents processed, and reconciliation between variances in quarterly and annual claim reports (Ref. AUD | 3.24.22 | 7).
- Wisconsin Deferred Compensation (CY 2021) – AUP engagement with exceptions noted in supporting documentation, account rollovers, domestic relations order distributions, and timeliness of transfers (Ref. AUD | 6.23.22 | 4).

For both these engagements, corrective action has been completed.

Additionally, the following two audits were recently completed:

- Navitus Pharmacy Benefit Program Administration Audit – The audit, completed by PillarRx, included multiple segments of services provided for plan years 2020 and 2021. Attachment I includes both the memo detailing the audit that was provided to the Group Insurance Board (GIB) for its November 2022 meeting, as well as the Executive Summary of the audit². Overall, the audit concluded that the programs are being administered per the plan design documentation. PillarRx included a recommendation for impact analysis for two claims processed and paid without having received the required prior authorization form. ETF discussed this with Navitus and will monitor for any future prior authorization form adherence issues.
- WebMD Wellness Program Administration Audit – The audit, completed by Segal, included an analysis of wellness incentive processing and payments, performance guarantee calculations, and billing activity for CY 2020-2021. Attachment II includes both the memo detailing the audit that was provided to the GIB for its November 2022 meeting, as well as the audit report. The audit identified some areas of improvement for WebMD and ETF to focus on going forward. These included ensuring correct and timely data is available pertaining to classification of incentive recipients as active or retired for tax withholding purposes, improvement to the data WebMD provides for future audits, and review of minor performance guarantee calculation discrepancies.

The following contract compliance engagements are currently in progress:

² The full report referenced as Attachment B in the GIB Memo is considered confidential and has therefore not been included. However, it was provided confidentially to GIB members for their review and oversight purposes.

- Life Insurance Program Administration – A contracted AUP engagement covering CY 2020-2021 is currently being finalized and will be provided at the March 2023 meeting.
- Employee Reimbursement/Health Savings/Commuter Benefit Accounts Administration – An internal audit by OIA is in progress, covering CY 2020-2021, and is scheduled to be presented at the March 2023 meeting.

For the externally contracted engagements listed above, OIA has assisted the program areas with planning and oversight of the engagement, including the following consulting services:

- Assisted in developing the statement of work for each engagement
- Attended engagement kickoff, periodic check-in, and exit meetings, as requested by program staff
- Reviewed draft reports and provided feedback to program managers and external auditors, including items to be corrected or clarified, and assessing adherence to the statement of work
- Reviewed final reports and provided comments for future engagement considerations
- Worked with program managers to track recommendations to ensure appropriate remediation of all findings by management
- Provided periodic updates to the Audit Committee of remaining open issues

Additionally, outside of TPA contract compliance, OIA has assisted the program areas in matters relating to contracting for TPAs, including things such as reviewing audit-related items in drafted TPA Request for Proposals (RFPs) and audit-related language in ETF's Department Terms and Conditions. OIA has also previously been involved in the procurement of external auditors to complete TPA contract compliance engagements and will assist in the future, as needed.

Future Contract Compliance Oversight

Contract Compliance engagements are a critical component of TPA oversight. They provide ETF management with the assurance that programs administered externally are being administered appropriately. As such, ETF management plans to continue to complete these engagements for the foreseeable future.

These engagements have traditionally been outsourced. However, in recent years, ETF's review of draft engagement reports has led to quality control concerns on some engagements. Additionally, for those completed as part of an AUP engagement, the AUP standards³ that need to be followed by the auditor's completing these engagements have been clarified to restrict the ability of the auditors in providing conclusions or recommendations based on the work performed. Therefore, additional work is now required of ETF program management to work with the TPA to assess any

³ AICPA Statement on Standards for Attestation 19 – Agreed-Upon Procedures Engagements indicates that a practitioner should not express an opinion or conclusion in any form, as well as any recommendations.

exceptions noted in the AUP engagements. OIA, therefore, is working with ETF management to assess if insourcing certain contract compliance engagements may be beneficial to ETF's oversight.

Insourcing would lead to a reduction in externally contracted costs, allow for additional flexibility and expansion in the scope of the engagements performed, and provide ETF with increased control over the quality of work performed. The following table indicates future planned contract compliance engagements for ETF's TPAs. Engagements marked with an '*' are the ones that could potentially be insourced and completed using OIA resources.

Program (TPA)	Audit Frequency	Next Planned Engagement
Employee Reimbursement / Health Savings / Commuter Benefit Accounts (Optum Financial)	Biennial	OIA is in the process of completing an audit covering CY 2020-2021*
Pharmacy Benefit (Navitus)	Annual	Engagement covering CY 2021 Employer Group Waiver Plan (EGWP) and CY 2022 Commercial planned to be completed in CY 2023
Uniform Dental Benefit (Delta Dental of Wisconsin)	Biennial	Engagement covering CY 2021-2022 tentatively planned to be completed in CY 2023
Income Continuation Insurance (The Hartford)	Triennial	Engagement covering CY 2021-2023 tentatively planned to be completed in CY 2024*
Wisconsin Deferred Compensation (Empower Retirement)	Biennial (Covers One Year Only)	Engagement covering CY 2023 tentatively planned to be completed in CY 2024*
Wellness and Disease Management (WebMD)	Biennial	Engagement covering CY 2022-2023 tentatively planned to be completed in CY 2024*
Life Insurance (Securian)	Biennial	Engagement covering CY 2022-2023 tentatively planned to be completed in CY 2024*

*OIA future potential insource opportunity

Staff will be available at the Audit Committee meeting to provide an overview of the audits attached and answer any questions pertaining to TPA contract compliance oversight.



STATE OF WISCONSIN
Department of Employee Trust Funds
 A. John Voelker
 SECRETARY

Wisconsin Department
 of Employee Trust Funds
 PO Box 7931
 Madison WI 53707-7931
 1-877-533-5020 (toll free)
 Fax 608-267-4549
 etf.wi.gov

Correspondence Memorandum

Date: October 3, 2022

To: Group Insurance Board

From: Tricia Sieg, Pharmacy Benefit Programs Manager
 Office of Strategic Health Policy

Subject: Audit of Pharmacy Benefit Manager

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

Background

The Department of Employee Trust Funds (ETF) retained PillarRx Consulting, LLC (PillarRx), to conduct a comprehensive annual audit of the administration of all pharmacy benefit programs included as part of the State of Wisconsin Public Employees Group Health Insurance Program (GHIP).

PillarRx is an independent auditing firm that specializes in the pharmaceutical industry. Their audits assess compliance with the Group Insurance Board's (Board's) contract with Navitus Health Solutions, LLC (Navitus), as the pharmacy benefit manager (PBM).

PillarRx performed a comprehensive audit of Navitus's administration of the pharmacy benefits offered to all members. The most recent audit reviewed the following:

- Commercial pharmacy claims January 1, 2021, through December 31, 2021
- Employer Group Waiver Plan (EGWP) pharmacy claims January 1, 2020, through December 31, 2020
- Pharmacy Network January 1, 2020, through December 31, 2020
- Pharmacy Rebates October 1, 2020, through December 31, 2020.

After review, the auditors concluded that the plans are being administered per the plan design documentation. PillarRx considers this a passing audit.

Audit Highlights

PillarRx found that Navitus is overperforming on its contractual discount obligation to the Board for both commercial and EGWP populations.

Reviewed and approved by Eileen Mallow, Director, Office of Strategic Health Policy
 Electronically Signed 10/18/2022

Board	Mtg Date	Item #
GIB	11.16.22	8

Under the terms of the Board’s contract with Navitus, for the 1,355,827 commercial pharmacy claims filed in 2021, the contracted claims ingredient cost should have been \$320,203,694. However, the actual cost was \$294,345,762, which is a savings of \$25,857,932 beyond what is guaranteed in the Board’s contract with Navitus. This information is laid out in the table on page 9 in Attachment B of this memo.

While this and past PillarRx’s audits show an increase in contracted and actual claims ingredient costs, the savings the Board is realizing in contracted costs is also growing. From 2018 through 2020 the savings rate was about 5% each year. In 2021, the savings rate increased to 8%.

Year	Contracted Claims Ingredient Cost (\$)	Actual Claims Ingredient Costs (\$)	Savings Over Contracted Costs (\$)
2021	\$320,203,694	\$294,345,762	\$25,857,932
2020	\$285,008,053	\$269,458,485	\$15,549,567
2019	\$238,100,644	\$225,520,616	\$12,580,028
2018	\$240,881,739	\$229,085,151	\$11,796,588

The reconciliation of the pricing guarantees for the 2020 EGWP benefit found that the 900,517 pharmacy claims filed under the parameters of the contract should have cost \$146,211,604. However, the cost was instead \$137,837,164, resulting in a savings of \$8,374,440 beyond the contract guarantee. This information is laid out in the table on page 10 in Attachment B of this memo.

Dispensing fees are an agreed-upon contracted price between a pharmacy and the PBM for filling a prescription. When Navitus enters into an agreement with a pharmacy, it is not only on behalf of the Board’s members but Navitus’s entire book of business.

This audit shows Navitus paid \$183,503.38 less in commercial dispensing fees than expected while paying \$122,244.58 more in EGWP dispensing fees. Under Navitus’s contract with the Board, there is no penalty for the underperforming EGWP dispensing fee. The lack of penalty is due to the savings the State received, which is more than the combined \$122,244.58 in dispensing fee overcharges.

Navitus attributes the underperformance of EGWP dispensing fees compared to the contractual guarantees to an issue with a handful of long-term care (LTC) pharmacy groups that have high dispensing fees. When creating the guarantees for dispensing fees in the contract, Navitus’s Provider Services Team assumed all claims from these facilities would be excluded from the performance calculations (claims for LTC pharmacies are typically excluded due to their high dispensing fees). However, these pharmacies are also filling many non-LTC claims for the members. Those claims are being included in the performance calculation and are causing the results to show an underperformance regarding the dispensing fees.

ETF is satisfied with Navitus's explanation of the underperformance of EGWP dispensing fees guarantees as laid out in the contract.

As noted on pages 12 through 25 of Attachment B to this memo, PillarRx conducted audits of numerous aspects of the pharmacy contract and found all passed/were within normal variance levels.

Rebate Audit

PillarRx reviewed pharmaceutical manufacturer rebate contracts and invoices and performed an analysis to compare the contracts to ETF's claims utilization. PillarRx reviewed agreements and amendments between Navitus and eight pharmaceutical manufacturers who produced the pharmaceuticals with the highest drug spend by ETF's membership in Quarter 4 of 2020. Each contract was examined with special attention paid to the following areas:

- Base rebates
- Market share rebate
- Formulary type
- Administrative fees
- Market share calculations
- Other fees.

PillarRx found less than 5% variance. These variances were investigated and found to be from claims where ETF's coverage was not the primary or due to standard manufacturer exclusions. Overall, rebates are paid accurately and in accordance with Navitus's contract with the Board.

2021 Commercial Plan Design Audit

PillarRx examined 100% of ETF's commercial pharmacy claims from January 1, 2021, through December 31, 2021, including claims that were reversed or rejected. These claims were examined to make sure they followed contract and benefit guidelines, such as those listed below:

- Copayment rules
- Day supply limits
- Drug exclusions
- Prior authorization (PA) requirements
- Quantity limits.

PillarRx found miscellaneous, minor inconsistencies and discrepancies that were validated as appropriate by Navitus or were reprocessed correctly.

2020 EGWP Plan Design Audit

In their examination of the 2020 EGWP, PillarRx examined 100% of the Prescription Drug Event (PDE) records. PDE records are not the same as pharmacy claims as they include information regarding post-transaction adjustments between plan and

pharmacy, plan-to-plan adjustments, and plan to Center for Medicaid & Medicare (CMS) adjustments. These claims were examined to make sure they followed contract and benefit guidelines, including those listed below:

- Matched source claim files to the PDE records
- Analyzed claims for accuracy and appropriateness
- Reviewed copayments and coinsurance rates
- Drugs were charged on the correct drug formulary tier
- Low-Income Cost Sharing (LICS) calculations were correct
- Accuracy of coverage gap discount calculations.

PillarRx found miscellaneous, minor inconsistencies and discrepancies that were validated as appropriate by Navitus or were reprocessed correctly.

Invoice Reconciliation Audit

PillarRx analyzed 100% of the claim data for the year and found that Navitus is invoicing ETF accurately.

Operational Review

PillarRx reviewed Navitus' performance standards outlined in its contract with the Board. PillarRx found two performance standards Navitus failed to meet during Quarter 4 of 2020. The audit lays out those standards that Navitus failed to meet on page 23 of attachment B and notes that \$33,000 in penalties Navitus paid for failing to meet the contracted standards.

PillarRx notes that Navitus met all contractual requirements and performance standards required by the Board or paid out the appropriate penalty.

PillarRx Recommendations

In both the 2020 EGWP Design Audit and the 2021 Commercial Plan Design Audit PillarRx found one claim that Navitus processed and paid without having received the required PA form. PillarRx recommends that "the State work directly with Navitus in regards to any additional impact." These recommendations can be found in Attachment B to this memo on pages 18 and 21.

ETF reached out to Navitus regarding PA form protocols and any changes that may have been made in the company's system regarding PA forms since 2021. Navitus stated that in their system, not all PA forms remain attached to a claim and that some member PA forms are entered due to a transition period (for example, when there is a formulary change). Navitus does have a member PA auditing tool that allows for every member PA form to be retrievable and reviewable.

ETF staff will ensure all yearly audits for the pharmacy benefits program check for PA form adherence. If a pattern of claims being approved without required PA forms starts to emerge ETF will work with Navitus on a corrective action plan.

Audit of Pharmacy Benefit Manager

October 3, 2022

Page 5

Staff will be available at the Board meeting to answer questions.

Attachment A: PillarRx Pharmacy Program Oversight Executive Summary

Attachment B: PillarRx Prescription Benefit Management Audit (Confidential)



PillarRx
C o n s u l t i n g

CUSTOMIZED PHARMACY SOLUTIONS

Pharmacy Program Oversight Executive Summary

Created for

State of Wisconsin ETF

Audit Period:

EGWP Plan: January 1, 2020 – December 31, 2020

Commercial Plan: January 1, 2021 – December 31, 2021

September 29, 2022



CUSTOMIZED PHARMACY SOLUTIONS

Table of Contents

<u>I. Auditor's Report</u>	3
<u>II. Auditor's Findings</u>	4
<u>III. Auditor's Conclusions</u>	5



CUSTOMIZED PHARMACY SOLUTIONS

I. Auditor's Report

State of Wisconsin, Department of Employee Trust Funds (ETF), on behalf of the State of Wisconsin Group Insurance Board (Board), is assessing the performance of the Board's Pharmacy Benefit Manager (PBM), Navitus Health Solutions, LLC (Navitus). ETF is completing this audit to maintain ongoing oversight efforts and obtain a thorough understanding of the performance of the contracted PBM.

ETF provides pharmacy benefit program management for nearly 240,000 participating members associated with annual total drug costs in excess of \$400 million.

PillarRx performed a comprehensive audit of Navitus' administration of the pharmacy benefits for ETF.

Client Name	State of Wisconsin ETF
PBM Name	Navitus
EGWP Claims Period	01/01/2020 through 12/31/2020
Commercial Claims Period	01/01/2021 through 12/31/2021
Pharmacy Network Period	01/01/2020 through 12/31/2020
Rebate Periods	10/01/2020 through 12/31/2020

II. Auditor's Findings

Commercial Plan Design and Pricing Audits

- **Copay:** Miscellaneous minor inconsistencies were found in collected copays that represented a minimal overall variance, that were all explained by Navitus and deemed correct.
- **Plan Design:** PillarRx noted 1 discrepancy within prior authorizations and no issues noted in day supply, drug exclusions, quantity limits or gender edits. The 1 discrepancy is listed below:
 - 1 claim was paid without a PA incorrectly. Navitus has confirmed the observation and corrected the Generic Product Identifier (GPI). Product is Testosterone. PillarRx recommends that the State work directly with Navitus regarding the impact analysis.
- **Pricing:** PillarRx concludes that Navitus is over performing based on the commercial contract.

Onsite Review of Pharmacy Network Contracts

PillarRx concludes that all the pharmacies, including the large chains, were compliant with their contracts and were performing as expected.

Rebate Audit

PillarRx concludes that Navitus is processing and paying rebates for ETF in compliance with the contracts with the manufacturers.

Employer Group Waiver Plan (EGWP) Audit

- **PDE Analysis:** PillarRx audited 100% of the Prescription Drug Event (PDE) records processed from January 1, 2020 through December 31, 2020, and originally found 40,153 discrepancies between the source claim and the associated PDE, which is less than 2 percent of all PDE's. Navitus addressed the issues satisfactorily. PillarRx concludes that PDE records have been accurately and appropriately generated.
- **Pricing:** PillarRx concludes that Navitus is over performing on discount rates based on the EGWP contract and is under performing in dispensing fees. The Navitus contract guarantees with the State allow the offsetting of the discount guarantee with the dispensing fee guarantee, therefore the overall EGWP Pricing performance was an over performance.

- **Plan Design:** PillarRx noted 1 discrepancy within prior authorizations and no issues noted in day supply, drug exclusions, quantity limits or gender edits. The 1 discrepancy is listed below:

1 claim was identified as an observation and Navitus has a correction in process. Product is KISQALI. PillarRx recommends that the State work directly with Navitus in regards to the impact analysis.

Copayment Analysis: PillarRx’s copay analysis includes verifying True Out of Pocket (TrOOP) calculation, formulary match, Low Income Cost Sharing (LICS) calculations and GAP discount calculations based on CMS guidance. PillarRx reviewed all responses from Navitus and agrees that copays are adjudicating according to plan design and CMS guidance with exception of 6 claims that had to be reprocessed.

6 claims were identified to require reprocessing to correct the Member Out of Pocket (MOOP). PillarRx recommends that the State work directly with Navitus in regards to the impact analysis.

Invoice Reconciliation Audit

Upon reconciliation for 1/1/2021 – 12/31/2021 invoices, PillarRx found that all invoiced dollars and claim counts matched what was found on the claim records for the given period. PillarRx concludes that Navitus is invoicing the State accurately.

III. Auditor’s Conclusions

PillarRx considers this a passing audit. All variances identified were validated as appropriate by Navitus. After review of Navitus’ responses to our findings, we are comfortable that State of Wisconsin, Department of Employee Trust Funds plans are being administered per the plan design documentation.

PillarRx will continue to review pricing, rebates, EGWP and commercial plan design on behalf of the State of Wisconsin, Department of Employee Trust Funds.

PillarRx considers the State of Wisconsin ETF relationship with Navitus to be well founded. Performance on pricing exceeds benchmarks in the industry and adherence to the benefit structure also compares most favorably to the market.



CUSTOMIZED PHARMACY SOLUTIONS

This document has been prepared in good faith on the basis of information provided to PillarRx Consulting, without any independent verification. If the data, information, and observations received are inaccurate or incomplete, our review, analysis, and conclusions may likewise be inaccurate or incomplete. Our conclusions and recommendations are developed after careful analysis and reflect our best professional judgment.

This document is the proprietary work product of PillarRx Consulting and is provided for your internal use only. No further use or distribution to any third party is authorized without PillarRx Consulting's prior written consent.

PillarRx Consulting representatives may from time to time provide observations regarding certain tax and legal requirements including the requirements of federal and state health care reform legislation. These observations are based on our good-faith interpretation of laws and regulations currently in effect and are not intended to be a substitute for legal or tax advice. Please contact your legal counsel and tax accountant for advice regarding legal and tax requirements.



STATE OF WISCONSIN
Department of Employee Trust Funds
 A. John Voelker
 SECRETARY

Wisconsin Department
 of Employee Trust Funds
 PO Box 7931
 Madison WI 53707-7931
 1-877-533-5020 (toll free)
 Fax 608-267-4549
 etf.wi.gov

Correspondence Memorandum

Date: October 10, 2022

To: Group Insurance Board

From: Molly Dunks, Disease Management & Wellness Program Manager
 Office of Strategic Health Policy

Subject: Well Wisconsin Audit Findings

This memo is for informational purposes. No Board action is requested.

Background

The Wisconsin Department of Employee Trust Funds (ETF) contracted with Segal to conduct an audit of WebMD's administration of wellness incentive processing and payments, performance guarantee calculations, and billing activity for January 1, 2020 through December 31, 2021. Segal's final report, which includes WebMD's response, is attached for reference.

Wellness Incentive Processing and Payments

Segal audited the accuracy of a random sample of 200 incentive payments from January 1, 2020 through December 31, 2021 (100 from each calendar year). Further, Segal audited a targeted sample of 50 payments (25 from each calendar year) to explore potential payment duplication or discrepancy. There were no findings in the random sample and 14 findings (3 resulting from WebMD errors) in the targeted sample. The three WebMD errors resulted in retirees not paying their personal portion of the Federal Insurance Contributions Act. No corrective action is needed because the impact is minimal and amending tax filings would create hardships. ETF is updating internal processes to ensure all members are included for tax reporting. The remaining 11 findings in the targeted sample were due to delays in updating eligibility information provided to WebMD. In each of the cases, the employer reported the termination or retirement after the fact. ETF encourages employers to make changes to enrollment timely and has provided further education to employers identified in this audit.

Segal indicated that they could not measure the turnaround time for incentive payments. Some payment dates appeared to occur prior to activity completion in 2020 due to system changes that reset the incentive issue dates. Upon further review WebMD was able to provide the date information. Lastly, due to the implementation of the new WebMD ONE system in 2021, the first file sent to the gift card administrator did not occur until February 22, 2021. Therefore, the payment dates between January 1 to

Eileen K. Mallow

Reviewed and approved by Eileen Mallow, Director, Office of Strategic Health Policy
 Electronically Signed 10/25/2022

Board	Mtg Date	Item #
GIB	11.16.22	11

February 22, 2021, do not match. WebMD agrees with Segal's recommendation to document the last date of wellness activities and the date of payment/denial to calculate turnaround time in the future.

Performance Guarantee Calculations

Segal reviewed performance metrics reported by WebMD against raw data presented by WebMD. There were no substantial deviations identified. However, with the transition from StayWell to WebMD, Segal recommends WebMD review some minor discrepancies within the calculations and that ETF continue to monitor performance guarantee calculations in the future.

Billing Activity

Segal reviewed billing activity from the months of July, October, and November 2020 and May, June, October, and November 2021 to ensure accurate participant counts were utilized for billing purposes. Segal identified four areas of attention:

1. There was a discrepancy of 31 payments totaling \$4,500.76 between ETF's balance forward file and the raw data from the incentive file for 2020. 23 payments were due to payments being carried over from calendar year 2019 activity and 8 payments were manually added due to appeals. Segal notes that the incentive file, for record-keeping purposes, should include all incentives paid within the calendar year. WebMD agrees to provide a file for all incentives issued within the calendar year in future audits.
2. There was an underpayment of \$260 by ETF to WebMD due to an incorrect calculation for two screening event cancellations in 2020. WebMD agreed this was their error and will invoice ETF for the outstanding \$260.
3. Segal identified 2021 flu vaccine charges of \$33 per unit, rather than the \$32 per unit as stated in the contract. However, ETF had agreed to this amount via email since the contract also stated vaccine pricing is subject to change due to fluctuating market pricing.
4. Segal identified that a \$15 charge is billed for initial physician form submissions and again if a second form is submitted for reprocessing due to a participant error in their initial submission. Segal suggests revisiting this contract term. ETF staff believe this is a fair charge since WebMD (or their subcontractor) must complete processing a participant's form regardless of whether it is the participant's first or second time submitting it. WebMD and ETF review the form submission instructions annually to ensure they are thorough and easy to understand.

Conclusion

The audit findings presented some areas for improvement. WebMD was cooperative throughout the audit process. ETF does not believe any of the findings are an obstacle to continuing to work with WebMD.

Staff will be available at the Board meeting to answer questions.

Attachment A: Segal Consulting's Final Audit Report



State of Wisconsin Department of Employee Trust Funds

**Analysis of WebMD Wellness Benefit
Processing and Payment Procedures, Billing
Activity & Performance Guarantee Review**

**For the Period of January 1, 2020 through December 31, 2021
Final Report**

August 15, 2022 / Amber M. Turner, MBA, PMP

WebMD Wellness Benefit Audit

Section I – Executive Summary	1
Scope of Services.....	1
Random Results	1
Target Sample Results	2
Performance Guarantee Review.....	2
Billing Accuracy Review.....	3
Key Findings and Recommendations	3
Wellness Benefit Payment	3
Performance Guarantee Review.....	5
Billing Activity Review	6
Section II – Random Wellness Benefit Payment Sample	8
Review Process.....	8
Random Error Results	9
Turnaround Time	9
Section III – Target Wellness Benefit Payment Sample.....	10
Target Error Table	11
Section IV - Performance Guarantee (PG) Review	13
Surveys	13
Health Coaching Behavior Change.....	25
Call Center Performance	29
Performance Guarantees Unable to be Measured	34
Section V – Billing Activity Review	36
Incentive Card – Calendar Year 2020.....	36
Incentive Card – Calendar Year 2021	36
Invoice Billing Calendar Year 2020	37
July 2020- Invoice Review	37
October 2020- Invoice Review	38
November 2020- Invoice Review	40
Invoice Billing - Calendar Year 2021.....	41
May 2021- Invoice Review	41
June 2021- Invoice Review	42

October 2021- Invoice Review	43
November 2021- Invoice Review	44
Additional Billing Findings	46
Section VI – WebMD’s Response to the Draft Report	47

Section I – Executive Summary

This report analyzes and evaluates WebMD’s (formally known as StayWell) 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 Nadine Boakye-Ansah of Segal’s Benefit Audit Solutions Practice conducted the remote review of 250 wellness benefit payments, performance guarantee recalculation, and billing activity review.

Scope of Services

WebMD provided an electronic data file of all wellness benefits processed and paid during the 24-month audit period of January 1, 2020 through December 31, 2021. The objective of the review was to ensure wellness benefits were paid in accordance with the State’s contract with WebMD. Segal’s audit included the following in-house and remote review components:

- An adjudication procedures review questionnaire was provided to WebMD to assess day-to-day processing guidelines and wellness benefit control measures;
- A random sample of 200 (100 from each calendar year) wellness benefit payments from January 1, 2020 through December 31, 2021 of all benefit payments processed during the audit period;
- A 50 (25 from each calendar year) target wellness benefit payments selection from January 1, 2020 through December 31, 2021 identified through electronic analyses designed to explore potential duplicate payments and file payment discrepancies;
- An assessment of the Performance Guarantee data to measure reported performance guarantees against raw data; and,
- An assessment of billing activity from the months of July, October, and November in calendar year 2020; May, June, October, and November, in calendar year 2021.

The auditors completed a form for each sampled wellness benefit payment 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 (1–100) are further distinguished by the calendar year. The auditors reviewed each wellness benefit payments to identify any variances in procedures and benefit determination.

Worksheets T1–T25, for each calendar year, include a “T” to distinguish the “target” sampling of wellness benefit payment identified through electronic analyses. These wellness benefit payments were reviewed for the attribute selected for validation (e.g., duplicate payment, benefit provision, etc.).

Random 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.

In 2020, a total of 43,448 wellness benefit payments were made totaling \$6,459,891.84 (amount does not include FICA deduction of \$57,308.16).

In 2021, a total of 47,790 wellness benefit payments were made totaling \$7,106,014.36 (amount does not include FICA deduction of \$62,485.64).

The random sample of 200 (100 from each calendar year) wellness benefit payments did not present any errors.

Turnaround time could not be measured as some benefit payments were dispersed prior to the activity being completed within the data for calendar year 2020. For calendar year 2021 data the payment dates did not match the payment date on the benefit review image provided by WebMD.

Further detail is provided in Section II of this report.

Target Sample Results

WebMD supported an additional sample of 50 (25 from each calendar year) targeted 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;
- Gift card payment;
- 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 payments via remote review to validate the processing event or identify the root cause of the error, as applicable.

Of the 50 target wellness benefit payments, 3 errors from WebMD were identified.

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 WebMD from 2020 to 2021. From the documentation and data provided by WebMD, Segal recalculated the performance results and confirmed all performance guarantee calculations were aligned with the results WebMD presented to the State.

Further detail is provided in Section IV of this report.

Billing Accuracy Review

Segal reviewed the logs for participant counts and other activities billed to the State for July, October, and November in calendar year 2020 and May, June, October, and November in calendar year 2021. Verification of the accuracy of the program participant counts and amount invoiced to the Department was compared to the State's pricing contract with WebMD, raw data logs, vendor invoicing, and the State's balance forward statement (for the incentive program).

Of the billing months reviewed, Segal identified one underpayment error.

Further detail is provided in Section V 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. WebMD's written and verbal responses are paraphrased in italics throughout this report. WebMD was presented with a draft report on July 5, 2022 for its review and comment.

Wellness Benefit Payment

Details of the Wellness Benefit Payment review are as follows:

- The random sample of 200 (100 from each calendar year) wellness benefit payments did not uncover any errors.
- The target sample review discovered 14 findings; Only 3 of the findings were due to WebMD:
 - Three (3) transactions paid retiree members as active members due to when the activity was completed and not when the payment was made.

WebMD's director of strategic accounts agreed with this error during the remote review.

Segal noted that WebMD has acknowledged this error and appropriate coaching as well as monitoring should occur from WebMD.

WebMD's Formal Response: *Three (3) transactions paid retiree members as active members due to when the activity was completed and not when the payment was made. WebMD working with the State of WI on next steps from a tax perspective. This was an issue with the set-up and won't happen again in the future.*

- Five (5) samples contained members whose eligibility terminated prior to the last activity being completed.

WebMD noted that the eligibility on its side was still active at the time payment was distributed.

The State confirmed that this issue was due to the State or Employer's eligibility entry date. The State confirmed that WebMD is not at fault for these transaction errors.

- Six (6) samples contained members whose eligibility was active status at the time of payment but through the States eligibility records the member was noted as a retiree

status at the time of payment. As the status was active at the time of payment, the FICA deduction was not applied.

WebMD noted that it relies on the State's eligibility file and the eligibility file was noted as active at the time the payment was issued.

The State confirmed that this issue was due to the State or Employer's eligibility entry date. The State confirmed that WebMD is not at fault for these transaction errors.

- Turnaround time could not be measured as some benefit payments were dispersed prior to the activity being completed within the data for calendar year 2020. For calendar year 2021 data the payment dates did not match.

Segal noted that the data file for transactions provided by WebMD had many last activity dates post payment and the dates of payment were not a true representation of the actual paid date. As witnessed during the review, WebMD was able to provide the true and accurate payment date. Although this information was provided the data file was not a true representation of the actual paid date; therefore, the turnaround time for payment could not be measured in calendar years 2020 and 2021.

WebMD's formal response: WebMD notes that regarding Segal's finding that the 2020 paid dates could not be measured: All dates were supplied to Segal, however select payment dates appeared to occur prior to activity completion dates for two primary reasons: (1) In August, the State of Wisconsin opted to make changes to the incentive program to allow for alternatives to the biometric screening. At this time, we restructured the rewards setup to categorize the activities. When these new overarching categories were awarded as a result of the change, they reflected an August date. (2) In June of 2020, WebMD experienced a challenge data issue that temporarily wiped tracking data from incentives. Once resolved, the activity completion date was updated to reflect the date of issue resolution. The State was notified of this issue on June 1, 2020. In all instances in which Segal inquired about conflicting dates, WebMD was able to validate the dates the activities were completed and incentives paid out.

Regarding the 2021 payment dates: WebMD notes that the first redemption file for the 2021 calendar year was sent to the gift card administrator on February 22, 2021. For this reason, the image payment dates prior to February 22, 2021, do not match.

Segal notes that turnaround time is based on a 100% analysis of the wellness benefit transaction data. The wellness benefit transaction data contained payment dates that were prior to the last activity dates resulting in the turnaround time analysis containing negative turnaround time results, which would indicate an inaccurate analysis. In conclusion, due to the negative amounts presented in the analysis, Segal cannot determine the turnaround time for calendar year 2020.

Segal recommends that going forward that WebMD provide the last date wellness activities were submitted by members and the date of payment/denial in order to be able to accurately calculate a 100% turnaround time during an audit. If the benefit was appealed, this information should be documented and noted within the data file to include the date the claim was appealed and the final determination date.

Performance Guarantee Review

Details of the Performance Guarantees Review are as follows:

- The following performance guarantees could not be measured.
 - Written Inquiry Responses – WebMD noted that they did not receive any written inquiries in calendar year 2020.
 - Health Coaching Behavioral Change - In calendar year 2021, the measurement tool changed with the transition to WebMD's ONE portal platform. Reporting for risk change will be available for analysis beginning in calendar year 2023.
 - Customer Service Satisfaction Survey – Due to the WebMD transition, this survey started in April of 2021 (Quarter 2). Quarter 1 does not have any data for assessment.
 - Lifestyle Management Survey – Due to the WebMD transition, this survey started in April of 2021 (Quarter 2). Quarter 1 does not have any data for assessment.
 - Condition Management Health Coaching – Due to the WebMD transition, this survey started in April of 2021 (Quarter 2). Quarter 1 does not have any data for assessment.
 - Behavioral Health Tobacco Cessation - The participation assumption was not met therefore the performance guarantee cannot be measured for calendar year 2020.
 - Screening Site Coordinator Survey – Quarter 3 and 4 of calendar year 2020 did not contain reporting as there was no participation in the survey for quarter 3 and no screening sites in quarter 4, as confirmed by WebMD.
- Health Coaching Behavioral change categories of Physical Activity, Stress Management, and Healthy Eating were missing raw data in calendar year 2020 due to a platform change WebMD implemented.
 - **Physical Activity:** Results from 53 of the 61 participants were measured by Segal.
 - **Stress Management:** Results from 27 of the 30 participants were measured by Segal.
 - **Healthy Eating:** Results from 29 of the 33 participants were measured for vegetables and 23 of the 27 participants were measured for fruit by Segal.

Segal noted that although the raw data is missing for calendar year 2020, the overall results would not impact the performance guarantee amount meeting its goal.

- Segal notes that the following performance guarantee calculations contain a slight discrepancy (0.1% - 1.2%) between Segal's calculation and WebMD's calculation.
 - Lifestyle Management
 - Calendar year 2020, quarters 3 (0.2%) and 4 (0.3%)
 - Calendar year 2021, quarter 2 (0.1%)
 - Participant Onsite Screening Survey
 - Calendar year 2020, quarters 1 (0.1%), 2 (0.2%), & 3 (0.1%)
 - Disease Management Health Coaching Survey
 - Calendar year 2020, quarters 1 (0.1%), 2 (0.5%), & 3 (1%)
 - Condition Management Health Coaching Survey
 - Calendar year 2021, quarter 2 (0.1%)

- Screening Site Coordinator Survey
 - Calendar year 2021, quarters 1 & 2 (no reporting was completed by WebMD)
 - Calendar year 2021, quarters 2 (0.7%) & 3 (1.2%)

Although minimum deviation was indicated, Segal recommends that WebMD review the listed calculation discrepancies within the performance guarantee calculations.

- Segal notes that the performance guarantee raw data and reporting has improved since the last audit (January 1, 2017 through December 31, 2019).

Although this data has improved, with the move to WebMD's ONE system, Segal recommends the State monitor the situation and reaudit to confirm no discrepancies are identified with the ongoing administration of the program.

WebMD's Formal Response: WebMD agreed with Segal's result review of the performance guarantees.

Billing Activity Review

Details of the Billing Activity Review are as follows:

Incentive Payment Calendar Year 2020

Segal reviewed the State's balance forward file against the raw data from the incentive file and found that the State was overbilled by 31 payments totaling \$4,500.76.

WebMD provided explanation for the differential and noted that 23 of the cards were not provided within the incentive file as they were from calendar year 2019. Eight (8) other files were added manually and sent to the State of Wisconsin and the Tango billing provider.

Segal notes that the incentive file, for record purposes should include all incentives paid within the calendar year.

Event Cancellation

Two event cancellations that were displayed on the November 2020 invoice as \$840.00 (\$420.00 per event) were undercharged. The correct amount for these events should have been \$1,100 combined (\$550.00 per event) resulting in an underpayment of -\$260.00.

The participant count for each event was 20 participants. The price per unit (PPU) is \$55.00. $20 \times 55 = 1,100$. This amount at 50% is equal to \$550.00 per event.

WebMD agreed with this error during the remote review.

Flu Shots

After reviewing the billing invoices, Segal identified in calendar year 2021 the flu shots were charged at \$33.00 per unit. The pricing contract between WebMD and the State note that in Calendar year 2021 the flu shots were to be charged at a rate of \$32.00 per unit.

Segal confirmed with the State that it was notified of this change and confirmed the pricing for calendar year 2021 for flu shots is \$33.00. The contract notes that the pricing is subject to change if terms and conditions change. The State will sign off on the updated pricing change.

Physician Forms

Segal identified in the three months of reviewing billing in calendar year 2020, 793 (\$11,985) physician forms were denied. Segal discussed with WebMD the process of a form being denied.

WebMD noted that if incomplete information (participant signature, blood pressure, height, weight, etc.) is received the physician form is denied. If denial occurs, the form can be resubmitted.

Segal notes that when the physician form is denied and then resubmitted again the State incurs an additional charge for the form to be reprocessed. This charge is equal to the original charge.

Segal recommends that the State review the charge of physician forms as it relates to the denial and resubmission with WebMD.

WebMD's Formal Response: WebMD agreed with Segal's result review of the 2020 and 2021 invoice review.

Section II – Random Wellness Benefit Payment Sample

WebMD provided a data file of all wellness benefit payments processed and paid during the 24-month audit period of January 1, 2020 through December 31, 2021. For the random selection, wellness benefit payments for January 1, 2020 through December 31, 2021 were utilized for sampling purposes.

In 2020, a total of 43,448 wellness benefit payments were made totaling \$6,459,891.84 (amount does not include FICA deduction of \$57,308.16).

In 2021, a total of 47,790 wellness benefit payments were made totaling \$7,106,014.36 (amount does not include FICA deduction of \$62,485.64).

Relevant wellness benefit payments processing information was verified through WebMD's responses to Segal's Adjudication Questionnaire, remote review discussions, auditors' observations, and the individual wellness benefit payments review.

Review Process

WebMD provided a copy of the sampled wellness benefit payments and screenshots for each selected payment in their wellness benefit payment system for the auditors' reference. Each wellness benefit activity 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 activity 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 payments were made only on behalf of eligible individuals based on records contained in the benefit payment system.
- Documentation was on file for wellness benefit activities and verified when necessary.
- Duplicate wellness benefit payments 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 WebMD's remote review representatives daily; additional supporting documentation was provided through May 18, 2022 for the review.

Random Error Results

The sample of 200 (100 from each calendar year) random sample wellness benefit payments did not identify any errors

Turnaround Time

Turnaround time could not be measured as some benefit payments dispersed payment prior to the activity being completed within the data for calendar year 2020. For calendar year 2021 data the payment dates did not match.

Segal notes that the data file for transactions provided by WebMD had many last activity dates post payment and the dates of payment were not a true representation of the actual paid date. As witnessed during the review, WebMD was able to provide the true and accurate payment date. Although this information was provided the data file was not a true representation of the actual paid date. therefore, the turnaround time for payment could not be measured in calendar years 2020 and 2021.

WebMD's formal response: WebMD notes that regarding Segal's finding that the 2020 paid dates could not be measured. All dates were supplied to Segal, however select payment dates appeared to occur prior to activity completion dates for two primary reasons: (1) In August, the State of Wisconsin opted to make changes to the incentive program to allow for alternatives to the biometric screening. At this time, we restructured the rewards setup to categorize the activities. When these new overarching categories were awarded as a result of the change, they reflected an August date. (2) In June of 2020, WebMD experienced a challenge data issue that temporarily wiped tracking data from incentives. Once resolved, the activity completion date was updated to reflect the date of issue resolution. The State was notified of this issue on June 1, 2020. In all instances in which Segal inquired about conflicting dates, WebMD was able to validate the dates the activities were completed and incentives paid out.

Regarding the 2021 payment dates: WebMD notes that the first redemption file for the 2021 calendar year was sent to the gift card administrator on February 22, 2021. For this reason, the image payment dates prior to February 22, 2021, do not match.

Segal notes that turnaround time is based on a 100% analysis of the wellness benefit transaction data. The wellness benefit transaction data contained payment dates that were prior to the last activity dates resulting in the turnaround time analysis containing negative turnaround time results, which would indicate an inaccurate analysis. In conclusion, due to the negative amounts presented in the analysis, Segal cannot determine the turnaround time for calendar year 2020.

Segal recommends that going forward that WebMD provide the last date wellness activities were submitted by members and the date of payment/denial in order to be able to accurately calculate a 100% turnaround time during an audit. If the benefit was appealed, this information should be documented and noted within the data file to include the date the claim was appealed and the final determination date.

Section III – Target Wellness Benefit Payment Sample

Segal performed an electronic review of all wellness activities completed and payments made during the 24-month audit period (January 1, 2020 through December 31, 2021). Segal's electronic review was designed to identify potential deficiencies in the benefit payment delivery system; however, the analysis was not expected to identify data entry errors.

Segal's electronic analyses included exploration of scenarios that could suggest a systematic error in programing and/or administrative procedures with focus given to patterns suggesting a greater financial impact to the Plan. The query process was defined by the following categories:

- Duplicate wellness benefit payment analysis;
- Gift card payment;
- Eligibility; and,
- Plan variables not represented in the random selection.

The State's contract with WebMD and eligibility documentation served as the references for the electronic analyses. Electronic reports provided a list of suspected errors that required the auditors' manual review to refine the analysis and identify any patterns of concern; a selection of wellness benefit payments was chosen to confirm suspected errors and identify appropriate query revisions.

The remote review of target wellness benefit payments 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 50 (25 from each calendar year) wellness benefit payments in the target sample through electronic analyses, 47 were supported by benefit documentation, confirmation of Program intent, and/or explanation of established administrative procedures.

Target Error Table

The sample of 50 (25 from each calendar year) wellness benefit payments identified 3 errors from WebMD.

Target Sample Errors			
Worksheet	Error Type	Details	Explanation
FICA Deduction			
2020-T16	FICA Deduction	State's Retiree Date: June 1, 2020 Paid Date: September 24, 2020	Three (3) transactions paid retiree members as active members due to when the activity was completed and not when the payment was made. <i>WebMD's director of strategic accounts agreed with this error during the remote review.</i> Segal noted that WebMD has acknowledged this error and appropriate coaching as well as monitoring should occur from WebMD. WebMD's Formal Response: Three (3) transactions paid retiree members as active members due to when the activity was completed and not when the payment was made. WebMD working with the State of WI on next steps from a tax perspective. This was an issue with the set-up and won't happen again in the future.
2020-T17	FICA Deduction	State's Retiree Date: August 1, 2020 Paid Date: September 3, 2020	
2020-T20	FICA Deduction	State's Retiree Date: June 1, 2020 Paid Date: October 14, 2020	
Late Termination			
2020-T12	Late Termination	State's Termination Date: July 31, 2020 Last Activity Date: August 26, 2020 Paid Date: August 27, 2020	Five (5) samples contained members whose eligibility terminated prior to the last activity being completed. <i>WebMD noted that the eligibility on its side was still</i>
2020-T13	Late Termination	State's Termination Date: September 30, 2020	

Target Sample Errors			
Worksheet	Error Type	Details	Explanation
		Last Activity Date: October 9, 2020 Paid Date: October 13, 2020	<i>active at the time payment was distributed.</i>
2020-T15	Late Termination	State's Termination Date: July 31, 2020 Last Activity Date: August 26, 2020 Paid Date: August 27, 2020	The State confirmed that this issue was due to the State or Employer's eligibility entry date. The State confirmed that WebMD is not at fault for these transaction errors.
2021-T8	Late Termination	State's Termination Date: December 31, 2020 Last Activity Date: February 2, 2021 Paid Date: February 5, 2021	
2021-T9	Late Termination	State's Termination Date: December 31, 2020 Last Activity Date: April 6, 2021 Paid Date: April 6, 2021	
Late Eligibility/FICA Deduction			
2020-T19	Late Eligibility/ FICA Deduction	State's Retiree Date: June 1, 2020 Paid Date: June 9, 2020	Six (6) samples contained members whose eligibility was active status at the time of payment but through the State's eligibility records the member was noted as a retiree status at the time of payment.
2020-T24	Late Eligibility/ FICA Deduction	State's Retiree Date: March 1, 2019 Paid Date: March 12, 2020	
2020-T25	Late Eligibility/ FICA Deduction	State's Retiree Date: March 1, 2019 Paid Date: June 5, 2020	<i>WebMD noted that it relies on the State's eligibility file and the eligibility file was noted as active at the time the payment was issued.</i>
2021-T4	Late Eligibility/ FICA Deduction	State's Retiree Date: June 1, 2021 Paid Date: June 8, 2021	The State confirmed that this issue was due to the State or Employer's eligibility entry date. The State confirmed that WebMD is not at fault for these transaction errors.
2021-T6	Late Eligibility/ FICA Deduction	State's Retiree Date: June 1, 2021 Paid Date: September 9, 2021	
2021-T7	Late Eligibility/ FICA Deduction	State's Retiree Date: October 1, 2021 Paid Date: October 7, 2021	
Total	3 Errors		

Section IV - Performance Guarantee (PG) Review

Segal reviewed performance guarantees against the supporting raw data that was presented by WebMD. The following sections include the performance guarantee calculation outcomes.

WebMD's Formal Response: *WebMD agreed with Segal's result review of the performance guarantees.*

Surveys

Performance Guarantee: WebMD shall achieve a ninety percent (90%) satisfaction rate or better (defined as "top two-box" satisfaction/approval using an approved standard 5-point survey tool) on all surveys required by the Contract, including client satisfaction, site administrator, call center service, onsite health screenings, health assessment and web portal, lifestyle management coaching, disease management coaching, and Well Wisconsin Radio sessions.

Conducting Surveys

The State assessed WebMD the following penalties for quarter one in calendar year 2021 for not administering surveys:

- Customer Service Satisfaction
- Condition Management Health Coaching
- Lifestyle Management Health Coaching

Helpline Survey

The Helpline Survey presented five (5) statements regarding services provided to users of the Helpline in calendar year 2020. The Customer Service Satisfaction Survey replaced the Helpline Survey in calendar year 2021. The assessment is based on the following statements:

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 calendar year 2020 are displayed in the tables below:

Calendar Year 2020 – Overall Results

2020 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	73.1%	59.1%	94.2%	90.9%
Pass/Fail	Fail	Fail	Pass	Pass
WebMD's Report	73.1%	59.1%	94.2%	90.9%
Penalty ¹	Noted	Noted	N/A	N/A
Overall CY 2020	91.3%			

¹ A penalty is noted as assessed by the State.

Calendar Year 2020 - Percentage by Question

Question	Q1	Q2	Q3	Q4	Q5
Quarter 1	66.7%	100.0%	100.0%	60.0%	25.0%
Quarter 2	50.0%	87.5%	77.8%	44.4%	40.0%
Quarter 3	93.3%	95.7%	97.5%	92.2%	92.6%
Quarter 4	90.2%	92.3%	95.5%	89.6%	87.3%

Customer Service Satisfaction Survey

The Customer Service Satisfaction Survey presented on five (5) statements regarding service provided through the customer service call center. The Customer Service Satisfaction Survey replaced the Helpline Survey in calendar year 2021. The assessment is based on the following statements:

1. My customer service representative was polite and professional.
2. My customer service representative was able to answer my questions.
3. I am satisfied with the amount of time it took to get my questions answered.
4. Accessing the customer service department was easy and convenient.
5. I would recommend a co-worker to contact WebMD Customer Service for assistance.

As this survey started in April of 2021 (Quarter 2), the results for calendar year 2021 are displayed in the tables below:

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	N/A	94.8%	92.2%	89.7%
Pass/Fail	N/A	Pass	Pass	Pass
WebMD's Report	N/A	94.8%	92.2%	89.7%
Penalty ¹	Noted	N/A	N/A	N/A
Overall CY 2020	92.7%			

¹ A penalty is noted as assessed by the State.

Calendar Year 2021 - Percentage by Question

Question	1	2	3	4	5
Quarter 1	N/A	N/A	N/A	N/A	N/A
Quarter 2	97.3%	96.3%	95.2%	88.4%	95.9%
Quarter 3	93.1%	92.9%	92.9%	88.6%	93.3%
Quarter 4	91.5%	88.9%	88.9%	88.4%	90.7%

Segal notes that the penalty was assessed by the State for WebMD not performing the Customer Service Satisfaction Survey in Quarter 1. Quarter 4 was rounded up to 90%, as such, WebMD passed the performance guarantee in quarter 4.

Health Assessment and Portal

The Health Assessment and Portal Survey presented on eight (8) statements regarding service provided through the health assessment portal. The User Satisfaction Survey replaced the Health Assessment and Portal Survey in calendar year 2021. The calendar year 2020 assessment is based on the following statements:

1. Your experience completing the health assessment.
2. Your experience navigating WebMD 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 WebMD Portal.
6. Navigating the WebMD Portal.
7. Completing the health assessment.

8. Understanding your health assessment results.

The results for calendar year 2020 are displayed in the tables below:

Calendar Year 2020 – Overall Results

2020 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal’s Report	86.8%	87.9%	87.1%	85.3%
Pass/Fail	Fail	Fail	Fail	Fail
WebMD’s Report	86.8%	87.9%	87.1%	85.3%
Penalty ¹	Noted	Noted	Noted	Noted
Overall CY 2020	87.6%			

¹ A penalty is noted as assessed by the State.

Calendar Year 2020 - Percentage by Question

Question	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Quarter 1	92.2%	73.9%	90.8%	91.3%	88.3%	68.6%	93.6%	95.5%
Quarter 2	92.8%	76.7%	92.0%	92.4%	85.9%	72.6%	93.3%	97.2%
Quarter 3	92.6%	74.7%	90.2%	92.4%	87.2%	68.9%	93.1%	96.5%
Quarter 4	88.7%	74.8%	87.7%	91.1%	85.6%	70.2%	89.4%	94.4%

User Satisfaction Survey

The User Satisfaction Survey presented on ten (10) statements regarding service provided through the health assessment portal. The User Satisfaction Survey replaced the Health Assessment and Portal Survey in calendar year 2021. The calendar year 2021 assessment is based on the following statements:

1. The information was useful.
2. It was easy to move around the site.
3. It was easy to find information.
4. I found ways to better manage my health.
5. The information was easy to understand.
6. The information was comprehensive.
7. I trust the information.

- 8. I have better understanding of my health.
- 9. I am satisfied with my experience using these health tools.
- 10. I will continue to use the site to manage my health.

The results for calendar year 2021 are displayed in the tables below:

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal’s Report	95.1%	91.3%	94.2%	92.9%
Pass/Fail	Pass	Pass	Pass	Pass
WebMD’s Report	95.1%	91.3%	94.2%	92.9%
Overall CY 2021	93.4%			

Calendar Year 2021 - Percentage by Question

Question	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Quarter 1	96.8%	97.8%	97.8%	90.2%	100.0%	96.9%	98.4%	88.8%	91.2%	91.9%
Quarter 2	92.7%	95.3%	94.3%	82.8%	95.8%	95.2%	92.2%	86.0%	92.2%	84.9%
Quarter 3	94.7%	97.1%	96.5%	89.9%	97.9%	97.1%	95.4%	89.3%	94.5%	88.5%
Quarter 4	94.5%	96.4%	96.3%	85.4%	97.5%	97.0%	94.5%	86.3%	94.4%	85.0%

Lifestyle Management Survey – Calendar year 2020

The Lifestyle Management Survey presented six (6) questions regarding services provided through the Lifestyle Management.

Due to the change in survey platforms from Survey Monkey to Health Cloud only six (6) of the eight (8) original questions that remained the same throughout calendar year 2020 were measured. The assessment is based on the following questions:

- 1. How likely is it that you would recommend WebMD 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)?

The results for 2020 are displayed in the tables below:

Calendar Year 2020 – Overall Results

2020 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	95.8%	94.9%	96.4%	96.6%
Pass/Fail	Pass	Pass	Pass	Pass
WebMD's Report	95.8%	94.9%	96.6%	96.9%
Overall CY 2020	95.9%			

Calendar Year 2020 – Percentage by Question

Question	Q1	Q2	Q3	Q4	Q5	Q6
Quarter 1	8.7	96.9%	96.2%	97.4%	97.9%	99.5%
Quarter 2	8.4	97.4%	96.1%	96.5%	96.4%	99.2%
Quarter 3	8.7	97.4%	99.3%	98.6%	97.8%	98.4%
Quarter 4	8.8	98.1%	98.2%	98.4%	97.8%	99.3%

Lifestyle Management Survey – Calendar year 2021

The Lifestyle Management Survey presented five (5) statements regarding services provided through the Lifestyle Management program.

The assessment is based on the following statements:

1. Your health coach was knowledgeable.
2. You learned something.
3. The coaching session motivated you to make healthy changes in your life
4. Your coaching session was a positive experience.
5. I would recommend the program to a friend or colleague.

This survey did not contain data until April 2021 (Quarter 2), the results for calendar year 2021 are displayed in the tables below:

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	N/A	95.5%	93.0%	95.2%
Pass/Fail	N/A	Pass	Pass	Pass
WebMD's Report	N/A	95.6%	93.0%	95.2%
Penalty ¹	Noted	N/A	N/A	N/A
Overall CY 2021	94.5%			

¹ A penalty is noted as assessed by the State.

Calendar Year 2021 - Percentage by Question

Question	Q1	Q2	Q3	Q4	Q5
Quarter 1	N/A	N/A	N/A	N/A	N/A
Quarter 2	96.7%	93.1%	96.0%	97.7%	93.4%
Quarter 3	94.2%	91.3%	93.6%	95.0%	90.6%
Quarter 4	96.5%	94.2%	95.5%	96.5%	93.1%

Participant Onsite Screening Survey

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

1. Experience scheduling your screening appointment.
2. Explanation and consultation you received about your screening values.
3. Knowledge of the screening staff.
4. Overall wellness screening experience.
5. Professionalism of the screening staff.
6. In the future would you recommend this type of wellness screening to others?
7. Was the total amount of time allowed for your screening appointment too much, about right, or not enough?
8. How satisfied or dissatisfied are you with the screening appointment starting on time?

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

Calendar Year 2020 – Overall Results

2020 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	99.2%	99.6%	99.3%	N/A
Pass/Fail	Pass	Pass	Pass	N/A
WebMD's Report	99.3%	99.8%	99.2%	N/A
Overall CY 2020	99.3%			

Calendar Year 2020 - Percentage by Question

Question	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Quarter 1	97.1%	99.9%	99.9%	99.8%	99.9%	99.8%	99.7%	92.8%
Quarter 2	100.0%	100.0%	100.0%	100.0%	100.0%	99.1%	99.1%	95.2%
Quarter 3	97.1%	99.8%	99.9%	100.0%	100.0%	99.9%	99.8%	94.3%
Quarter 4	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	99.7%	99.7%	99.9%	N/A
Pass/Fail	Pass	Pass	Pass	N/A
WebMD's Report	99.7%	99.7%	99.9%	N/A
Overall CY 2021	99.8%			

Calendar Year 2021 - Percentage by Question

Question	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8
Quarter 1	98.7%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	94.3%
Quarter 2	99.1%	100.0%	100.0%	100.0%	100.0%	100.0%	99.8%	96.5%
Quarter 3	99.5%	99.9%	100.0%	100.0%	100.0%	100.0%	100.0%	97.3%
Quarter 4	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Disease Management Health Coaching Survey

The Disease Management Health Coaching Survey presented fifteen (15) questions regarding services provided through the Disease Management Health Coaching program. The Condition Management Health Coaching Survey replaced the Disease Management Health Coaching

Survey in calendar year 2021. The assessment for calendar year 2020 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 WebMD 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?

The results for calendar year 2020 are displayed in the tables below:

Calendar Year 2020 – Overall Results

2020 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	99.0%	97.1%	90.9%	100.0%
Pass/Fail	Pass	Pass	Pass	Pass
WebMD's Report	99.1%	97.6%	91.9%	100.0%
Overall CY 2020	98.1%			

Calendar Year 2020 - Percentage by Question

Quarter	Q1	Q2	Q3	Q4
Question 1	99.0%	98.2%	100.0%	100.0%
Question 2	99.0%	98.1%	75.0%	100.0%
Question 3	100.0%	96.2%	75.0%	100.0%
Question 4	100.0%	98.1%	100.0%	100.0%
Question 5	100.0%	98.1%	100.0%	100.0%
Question 6	100.0%	100.0%	100.0%	100.0%
Question 7	97.9%	98.2%	100.0%	100.0%
Question 8	98.9%	96.4%	50.0%	100.0%
Question 9	100.0%	91.7%	100.0%	100.0%
Question 10	94.6%	100.0%	100.0%	100.0%
Question 11	98.8%	100.0%	100.0%	100.0%
Question 12	100.0%	100.0%	100.0%	100.0%
Question 13	98.7%	100.0%	100.0%	100.0%
Question 14	98.8%	100.0%	75.0%	100.0%
Question 15	98.8%	100.0%	100.0%	100.0%

Condition Management Health Coaching Survey

The Condition Management Health Coaching Survey presented five (5) statements regarding services provided through the Condition Management Health Coaching. The Condition Management Health Coaching Survey replaced the Disease Management Health Coaching survey in calendar year 2021. The calendar year 2021 assessment is based on the following statements:

1. Your health coach was knowledgeable.
2. You learned something.
3. The coaching session motivated you to make healthy changes in your life
4. Your coaching session was a positive experience.
5. I would recommend the program to a friend or colleague.

This survey did not contain data until April 2021 (Quarter 2), the results for calendar year 2021 are displayed in the tables below:

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Quarter	Q1	Q2	Q3	Q4
Segal's Report	N/A	96.9%	95.9%	93.6%
Pass/Fail	N/A	Pass	Pass	Pass
WebMD's Report	N/A	97.0%	95.9%	93.6%
Penalty ¹	Noted	N/A	N/A	N/A
Overall CY 2021	95.7%			

¹ A penalty is noted as assessed by the State.

Calendar Year 2021 - Percentage by Question

Question	Q1	Q2	Q3	Q4	Q5
Quarter 1	N/A	N/A	N/A	N/A	N/A
Quarter 2	97.6%	95.3%	96.7%	98.2%	96.5%
Quarter 3	96.5%	94.8%	96.7%	96.8%	94.5%
Quarter 4	94.5%	92.1%	93.8%	94.8%	92.4%

Screening Site Coordinator Survey

The Screening Site Survey presented sixteen (16) statements regarding services provided through the screening site. The assessment is based on the following statements:

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.

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

Calendar Year 2020 – Overall Results

2020 Overall Performance Per Quarter				
Quarter	Q1	Q2*	Q3	Q4
Segal’s Report	100.0%	100.0%	N/A	N/A
Pass/Fail	Pass	Pass	Pass	Pass
WebMD’s Report	N/A	N/A	N/A	N/A
Overall CY 2020	100.0%			

*Only 1 Participant in Q2

Calendar Year 2020 - Percentage by Question

Question	Q1	Q2	Q3	Q4
Question 1	100.0%	100.0%	N/A	N/A
Question 2	100.0%	100.0%	N/A	N/A
Question 3	100.0%	100.0%	N/A	N/A
Question 4	100.0%	100.0%	N/A	N/A
Question 5	100.0%	100.0%	N/A	N/A
Question 6	100.0%	100.0%	N/A	N/A
Question 7	100.0%	100.0%	N/A	N/A
Question 8	100.0%	100.0%	N/A	N/A
Question 9	100.0%	100.0%	N/A	N/A
Question 10	100.0%	100.0%	N/A	N/A
Question 11	100.0%	100.0%	N/A	N/A
Question 12	100.0%	100.0%	N/A	N/A
Question 13	100.0%	100.0%	N/A	N/A
Question 14	100.0%	100.0%	N/A	N/A
Question 15	100.0%	100.0%	N/A	N/A
Question 16	100.0%	100.0%	N/A	N/A

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	100%	99.3%	98.6%	100%
Pass/Fail	Pass	Pass	Pass	Pass
WebMD's Report	100%	100%	100%	100%
Overall CY 2021	99.5%			

Calendar Year 2021 - Percentage by Question

Question	Q1	Q2	Q3	Q4
Question 1	100.00%	100.00%	100.00%	100.00%
Question 2	100.00%	100.00%	100.00%	100.00%
Question 3	100.00%	100.00%	100.00%	100.00%
Question 4	100.00%	100.00%	100.00%	100.00%
Question 5	100.00%	100.00%	100.00%	100.00%
Question 6	100.00%	100.00%	100.00%	100.00%
Question 7	100.00%	100.00%	100.00%	100.00%
Question 8	100.00%	100.00%	100.00%	100.00%
Question 9	100.00%	100.00%	100.00%	100.00%
Question 10	100.00%	100.00%	100.00%	100.00%
Question 11	100.00%	100.00%	80.00%	100.00%
Question 12	100.00%	100.00%	100.00%	100.00%
Question 13	100.00%	88.9%	100.00%	100.00%
Question 14	100.00%	100.00%	100.00%	100.00%
Question 15	100.00%	100.00%	100.00%	100.00%
Question 16	100.00%	100.00%	100.00%	100.00%

Health Coaching Behavior Change

In calendar year 2021, the portal for these surveys were moved to WebMD's ONE portal. Reporting for these surveys are not available from calendar year 2021 through calendar year 2023. The reporting for calendar year 2020 is as follows.

Health Coaching Behavior Change: Physical Activity

Performance Guarantee: At least 40% of physical activity coaching Participants will improve their frequency of 30+ minutes of moderate exercise.

The results from 2020 do not project the data from the overall calculation as WebMD implemented a system platform change. Results from 53 of the 61 participants were measured by Segal.

Segal notes that although the raw data is missing, the overall results would not impact the performance guarantee amount meeting its goal.

The results for the performance guarantee review are as follows.

Calendar Year 2020 – Overall Results

2020 Overall Performance	
Segal's Report	71.1%
Pass/Fail	Pass
WebMD's Report	63.9%

Calendar Year 2020 – Amount by Category

Category	Amount
Total Participants	53 Participants
Showed Increase	38 Participants
Showed Decline	15 Participants

Category	Amount
1 Day Increase	16 Participants
2 Day Increase	12 Participants
3 Day Increase	6 Participants
4 Day Increase	2 Participants
5 or More Days Increased	2 Participants
1 Day Decrease	10 Participants
2 Day Decrease	1 Participant
3 Day Decrease	2 Participants
4 Day Decrease	2 Participants
5 or More Days Decreased	0 Participants

Health Coaching Behavior Change: Stress Management

Performance Guarantee: At least 50% of stress management coaching Participants will improve their perceived ability to cope with stress.

The results from 2020 do not project the data from the overall calculation as WebMD implemented a system platform change. Results from 27 of the 30 participants were measured by Segal.

Segal notes that although the raw data is missing, the overall results would not impact the performance guarantee amount meeting its goal.

The results for the performance guarantee review are as follows.

Calendar Year 2020 – Overall Results

2020 Overall Performance	
Segal’s Report	81.5%
Pass/Fail	Pass
WebMD’s Report	81.0%

Calendar Year 2020 – Amount by Category

Category	Amount
Total Participants	27 Participants
Increased in Stress Management	22 Participants
Decreased in Stress Management	5 Participants

Category	Amount
Increased to Extremely Effective	6 Participants
Increased to Quite Effective	14 Participants
Increased to Somewhat Effective	2 Participants
Decreased to Only Slightly Effective	1 Participant
Decreased to Quite Effective	1 Participant
Decreased to Somewhat Effective	3 Participants

Health Coaching Behavior Change: Healthy Eating

Performance Guarantee: At least 40% of nutrition coaching Participants will improve their fruit intake or 40% will improve their vegetable intake.

The results from 2020 do not project the data from the overall calculation as WebMD implemented a system platform change. Results from 29 of the 33 participants were measured for vegetables and 23 of the 27 participants were measured for fruit by Segal.

Segal notes that although the raw data is missing, the overall results would not impact the performance guarantee amount meeting its goal.

The results for the performance guarantee review are as follows.

Calendar Year 2020 – Overall Results

2020 Overall Performance		
Category	Fruits	Vegetables
Segal's Report	82.6%	79.3%
Pass/Fail	Pass	
WebMD's Report	85.2%	78.8%

Calendar Year 2020 – Amount by Category

Category	Fruits	Vegetables
Increased Servings	19 Participants	23 Participants
Decreased Servings	4 Participants	6 Participants

Category	Amount for Fruit	Amount for Vegetables
Servings Intake Did Not Change	0 Participants	0 Participants
Increased 1 Serving	13 Participants	11 Participants
Increased 2 Servings	6 Participants	7 Participants
Increased 3 Servings	0 Participants	4 Participants
Increased 4 Servings	0 Participants	1 Participant
Increased 5 or more Servings	0 Participants	0 Participants
Decreased 1 Serving	1 Participant	5 Participants
Decreased 2 Servings	3 Participants	0 Participants
Decreased 3 Servings	0 Participants	1 Participant
Decreased 4 Servings	0 Participants	0 Participants
Decreased 5 or more Servings	0 Participants	0 Participants

Health Coaching Behavior Change: Weight Management

Performance Guarantee: At least 50% of weight management coaching Participants will reduce their weight.

The results for the performance guarantee review are as follows.

Calendar Year 2020 – Overall Results

2020 Overall Performance	
Segal's Report	71.9%
Pass/Fail	Pass
WebMD's Report	71.9%

Calendar Year 2020 – Amount by Category

Category	Amount
Lost Weight	297 Participants
Gained Weight	116 Participants

Category	Amount
Weight did not change	0 Participants
Gained less than 1 pound	4 Participants
Gained 1-5 pounds	89 Participants
Gained 6-10 pounds	17 Participants
Gained 11-20 pounds	5 Participants
Gained 21-30 pounds	1 Participant
Gained 31+ pounds	0 Participants
Lost less than 1 pound	3 Participants
Lost 1-5 pounds	171 Participants
Lost 6-10 pounds	64 Participants
Lost 11-20 pounds	40 Participants
Lost 21-30 pounds	12 Participants
Lost 31+ pounds	7 Participants

Call Center Performance

The following tables contain the measurements for call center performance.

Telephone Response Time

Performance Guarantee: At least eighty-five percent (85%) of all calls to customer service will be answered within thirty (30) seconds; 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 WebMD customer service representative.

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

Calendar Year 2020 – Overall Results

2020 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	93.7%	79.9%	29.5%	33.0%
Pass/Fail	Pass	Fail	Fail	Fail
WebMD's Report	93.7%	79.9%	29.5%	33.0%
Penalty ¹	N/A	Noted	Noted	Noted
Overall CY 2020	42.91%			

¹ A penalty is noted as assessed by the State.

Calendar Year 2020 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total Calls	2435	1880	9619	6544
Calls Answered within PG	2281	1503	2842	2161

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	94.3%	93.2%	96.7%	96.2%
Pass/Fail	Pass	Pass	Pass	Pass
WebMD's Report	94.3%	93.2%	96.7%	96.2%
Overall CY 2021	95.07%			

Calendar Year 2021 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total Calls	3388	1482	2512	1327
Calls Answered within PG	3194	1381	2428	1277

First Call Resolution

Performance Guarantee: Ninety-five percent (95%) of calls to customer service will be handled to resolution on initial contact; 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:

Calendar Year 2020 – Overall Results

2020 Overall Performance Per Quarter				
Quarters	Q1	Q2	Q3	Q4
Segal's Report	93.6%	90.0%	96.4%	93.1%
Pass/Fail	Fail	Fail	Pass	Fail
WebMD's Report	93.6%	90.0%	96.4%	93.1%
Penalty ¹	Noted	Noted	N/A	Noted
Overall CY 2020	94.7%			

¹ A penalty is noted as assessed by the State.

Calendar Year 2020 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total calls counted in PG*	3283	2619	15755	6544
Number of follow up calls	211	263	575	449
Non-follow up calls within PG	3072	2356	15180	6095

*WebMD noted that the total calls for 2020 data deviates in the first call resolution as the old process that was agreed upon with the State since inception of the relationship opted to utilize calls logged within the HCT system for the first call resolution calculation. Since the move from StayWell to WebMD, total calls are now logged together in one category rather than a breakout from HCT calls.

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	97.3%	98.5%	97.4%	95.1%
Pass/Fail	Pass	Pass	Pass	Pass
WebMD's Report	97.3%	98.5%	97.4%	95.1%
Overall CY 2021	97.2%			

Calendar Year 2021 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total calls counted in PG	3388	1482	2512	1327
Number of follow up calls	91	22	65	65
Non-follow up calls within PG	3297	1460	2447	1262

Call Abandonment Rate

Performance Guarantee: Less than five percent (<5%) of calls abandoned, measured by the percentage of calls that are not answered by WebMD 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:

Calendar Year 2020 – Overall Results

2020 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	0.7%	0.7%	4.0%	5.8%
Pass/Fail	Pass	Pass	Pass	Fail
WebMD's Report	0.7%	0.7%	4.0%	5.8%
Penalty ¹	N/A	N/A	N/A	Noted
Overall CY 2020	3.9%			

¹ A penalty is noted as assessed by the State.

Calendar Year 2020 – Amounts in Count

Category	Q1	Q2	Q3	Q4
Total calls counted in PG	2435	1880	9619	6544
Not answered within PG	16	14	388	378

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	0.1%	0.3%	0.1%	0.4%
Pass/Fail	Pass	Pass	Pass	Pass
WebMD's Report	0.1%	0.3%	0.1%	0.4%
Overall CY 2021	0.2%			

Calendar Year 2021 – Amounts in Count

Category	Q1	Q2	Q3	Q4
Total calls counted in PG	3388	1482	2512	1327
Not answered within PG	4	5	3	5

Electronic Inquiry Response Rate

Performance Guarantee: Ninety-eight percent (98%) of customer service issues submitted by email, website and web-portal are responded to within two (2) Business Days.

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

Calendar Year 2020 – Overall Results

2020 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	99.8%	100.0%	99.4%	98.6%
Pass/Fail	Pass	Pass	Pass	Pass
WebMD's Report	99.8%	100.0%	99.4%	98.6%
Overall CY 2020	99.5%			

Calendar Year 2020 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total Email Inquiries	924	731	1120	424
Total Email Inquiries Not within Performance	2	0	7	6
Total Email Inquiries within Performance	922	731	1113	418

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	100.0%	100.0%	98.7%	99.8%
Pass/Fail	Pass	Pass	Pass	Pass
WebMD's Report	100.0%	100.0%	98.7%	99.8%
Overall CY 2021	99.4%%			

Calendar Year 2021 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total Email Inquiries	9102	11333	21427	4590
Total Email Inquiries Not within Performance	0	0	276	8
Total Email Inquiries within Performance	9102	11333	21151	4582

Written Inquiry Response Rate

Performance Guarantee: Ninety-eight percent (98%) of all written inquiries sent via USPS are responded to within ten (10) Business Days of receipt.

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

Calendar Year 2020 – Overall Results

No results were measured for 2020. Per WebMD, no written inquiries were received in calendar year 2020.

Calendar Year 2021 – Overall Results

2021 Overall Performance Per Quarter				
Performance Guarantee CY	Q1	Q2	Q3	Q4
Segal's Report	100.0%	100.0%	N/A	N/A
Pass/Fail	Pass	Pass	N/A	N/A
WebMD Report	100.0%	100.0%	N/A	N/A
Overall CY 2021	100.0%			

Calendar Year 2021 – Amounts in count

Category	Q1	Q2	Q3	Q4
Total Written Inquiries	1	1	0	0
Total Written Inquiries Not within Performance	0	0	0	0
Total Written Inquiries within Performance	1	1	0	0

Performance Guarantees Unable to be Measured

The following performance guarantees could not be measured.

- Written Inquiry Responses – WebMD noted that no written inquiries were received in calendar year 2020.
- Health Coaching Behavioral Change - In calendar year 2021, the portal for these surveys moved to WebMD's ONE portal. Reporting for these surveys are not available from calendar year 2021 through calendar year 2023 per contract.
- Customer Service Satisfaction Survey – Due to a survey portal change, this survey started in April of 2021 (Quarter 2). Quarter 1 does not have any data for assessment.

- Condition Management Survey – Due to a survey portal change, this survey started in April of 2021 (Quarter 2). Quarter 1 does not have any data for assessment.
- Lifestyle Management Survey - Due to a survey portal change, this survey started in April of 2021 (Quarter 2). Quarter 1 does not have any data for assessment.
- Behavioral Health Tobacco Cessation - The participation assumption was not met therefore the performance guarantee cannot be measured in calendar year 2020.

Section V – Billing Activity Review

Segal reviewed the State's and WebMD's pricing contract, WebMD's participant count data, the State's billing invoices, and the raw data provided by WebMD to reconcile and validate that the State was correctly billed for services provided by WebMD.

WebMD's Formal Response: *WebMD agreed with Segal's result review of the 2020 and 2021 invoice review.*

Incentive Card – Calendar Year 2020

Segal reviewed the State's balance forward file against the raw data from the incentive file and found that the State was overbilled by 31 cards totaling \$4,500.76.

WebMD provided explanation for the differential and noted that 23 of the cards were not provided within the incentive file as they were from calendar year 2019. Eight (8) other files were added manually and sent to the State of Wisconsin and the Tango billing provider.

Segal notes that the incentive file, for record purposes should include all incentives paid within the calendar year.

WebMD's formal response: *WebMD agreed with Segal's result review of the 2020 incentive card review. The eight files that were added manually and sent to the State of WI were due to the appeals process.*

Incentive Card – Calendar Year 2021

Segal reviewed the State's funding balance file against the raw data from the incentive file and identified no discrepancies within the files.

WebMD's formal response: *WebMD agreed with Segal's result review of the 2021 incentive card review.*

Invoice Billing Calendar Year 2020

Segal reviewed the logs for participant counts and other activities billed to the State for the months of July, October, and November in calendar year 2020. Verification of the accuracy of the program participant counts and amount invoiced to the Department was compared to the State's pricing contract with WebMD, raw data logs, and vendor invoicing.

Segal identified one issue within the invoice billing for calendar year 2020 related to an event cancellation fee. Details of the review are noted within the following tables.

WebMD's Formal Response: WebMD agreed with Segal's result review of the 2020 and 2021 invoice review.

July 2020- Invoice Review

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Telephone/Coaching	\$46.00	746	\$34,316.00	728677	WebMD	Excel- Activity Session 1 - All Calls	Pass
Disease Management Program	\$1.87	109321	\$204,430.27	728677	WebMD	Excel- 7-2020- State of Wisconsin Eligibles	Pass
Disease Management Coaching	\$78.00	399	\$31,122.00	728677	WebMD	Excel- Activity Session 1 - All Calls DM	Pass
Screening	\$55.00	219	\$12,045.00	728677	Quest Diagnostics	Excel PDF Document- Quest June 2020 screening activity	Pass
Screening True Up	\$55.00	36	\$1,980.00	728677	Quest Diagnostics	Excel PDF Document- Quest June 2020 screening activity	Pass
Physician Forms	\$15.00	2724	\$40,860.00	728677	US Wellness, INC	SWPCPW10620	Pass

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Screening-Cancellation	\$2,475.00	1	\$2,475.00	728677	Quest Diagnostics	INV0010340	Pass
Flu Shots True Up	\$31.00	40	\$1,240.00	728677	Total Wellness	N/A	Pass- This charge is for 2019 flu shots and were appropriately charged at \$31.00 per unit.
Wellness Platform	\$2.96	109321	\$323,590.16	728677	WebMD	Excel- 7-2020- State of Wisconsin Eligibles	Pass
Ignite	\$575.00	204	\$117,300.00	728677	WebMD	Excel- FitBit Promo Code List 7-23-2020- Ignite Participants	Pass

October 2020- Invoice Review

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Wellness Platform	\$2.96	109920	\$325,363.20	729225	WebMD	Excel- 10-2020- State of Wisconsin Eligible	Pass
Telephone/Coaching	\$46.00	1861	\$85,606.00	729225	WebMD	Excel- Activity Session 1 - All Calls	Pass
Disease Management Program	\$1.87	109920	\$205,550.40	729225	WebMD	Excel- 10-2020- State of Wisconsin Eligible	Pass
Disease Management Coaching	\$78.00	392	\$30,576.00	729225	WebMD	Excel- Activity Session 1 - All Calls DM	Pass
Screening	\$55.00	1064	\$58,520.00	729225	Quest Diagnostics	Excel PDF Document- Quest September 2020 screening activity	Pass

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Screening True up	\$55.00	181	\$9,955.00	729225	Quest Diagnostics	Excel PDF Document- Quest September 2020 screening activity	Pass
Physician Forms	\$15.00	3171	\$47,565.00	729225	US Wellness, INC	SWPCPWI0920	Pass
Home Test Kit Fulfillment	\$20.00	3992	\$79,840.00	729225	Quest Diagnostics	INV0087497/INV0088197	Pass
Home Test Kit Results	\$35.00	1123	\$39,305.00	729225	Quest Diagnostics	INV0088197	Pass
Gift Card - audit Credit	-\$150.00	1	-\$150.00	729225	WebMD Billing Invoice	729225	Pass
Gift Card - audit Credit	-\$150.00	1	-\$150.00	729225	WebMD Billing Invoice	729225	Pass

November 2020- Invoice Review

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Wellness Platform	\$2.96	110089	\$325,863.44	729363	WebMD	Excel- 11-2020- State of Wisconsin Eligibles	Pass
Telephone/Coaching	\$46.00	1468	\$67,528.00	729363	WebMD	Excel- Activity Session 1 - All Calls	Pass
Disease Management Program	\$1.87	110089	\$205,866.43	729363	WebMD	Excel- 11-2020- State of Wisconsin Eligibles	Pass
Disease Management Coaching	\$78.00	339	\$26,442.00	729363	WebMD	Excel- Activity Session 1 - All Calls DM	Pass
Group Weight Management Fitbit	\$92.00	1	\$92.00	729363	Fitbit, Inc.	3000619483	Pass
Physician Forms	\$15.00	4108	\$61,620.00	729363	US Wellness, INC	SWPCPW1020	Pass
Screening-Cancellation	\$840.00	1	\$840.00	729363	Quest Diagnostics	Excel PDF Document- Quest September 2020 screening activity	Segal notes that the amount billed for the cancellation should be \$1,100. During the remote review, WebMD agreed to this incorrect billing.
Flu Shot Coordination	\$250.00	105	\$26,250.00	729363	Total Wellness	N/A	Pass
Flu Shot True Up	\$31.00	87	\$2,697.00	729363	Total Wellness	20457	This charge is for 2019 flu shots and were appropriately charged at \$31.00 per unit.

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Flu Shots Additional Time	\$125.00	33.5	\$4,187.50	729363	Total Wellness	20457	Pass
Flu Shots Cancellation	\$186.00	1	\$186.00	729363	Total Wellness	20457	Pass
Home Test Kit Fulfillment	\$20.00	665	\$13,300.00	729363	Quest Diagnostics	INV0089025	Pass
Home Test Kit Results	\$35.00	2108	\$73,780.00	729363	Quest Diagnostics	INV0089025	Pass

Invoice Billing - Calendar Year 2021

Segal reviewed the logs for participant counts and other activities billed to the State for the months of May, June, October, and November in calendar year 2021. Verification of the accuracy of the program participant counts and amount invoiced to the Department was compared to the State's pricing contract with WebMD, raw data logs, and vendor invoicing.

Segal did not identify any issues within the invoice billing for calendar year 2021. Details of the review are noted within the following tables.

WebMD's Formal Response: WebMD agreed with Segal's result review of the 2020 and 2021 invoice review.

May 2021- Invoice Review

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Screening	\$55.00	168	\$9,240.00	S3-152902	Quest Diagnostics	INV0094402	Pass
Screening -No shows	\$55.00	20	\$1,100.00	S3-152902	Quest Diagnostics	INV0094402	Pass
Screening Cancellation Fees	\$550.00	1	\$550.00	S3-152902	Quest Diagnostics	INV0094402	Pass

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Physician Forms	\$15.00	648	\$9,720.00	S3-152902	Total Wellness	21905	Pass
Home Test Kit Fulfillment	\$20.00	898	\$17,960.00	S3-152902	Quest Diagnostics	94402	Pass
Home Test Kit Results	\$35.00	637	\$22,295.00	S3-152902	Quest Diagnostics	94402	Pass
Wellness Platform	\$2.96	111056	\$328,725.76	S3-152903	WebMD	Excel SOWI Eligible April	Pass
Disease Management Program	\$1.87	111056	\$207,674.72	S3-152903	WebMD	Excel SOWI Eligible April	Pass
Telephone/Coaching	\$46.00	2384	\$109,664.00	S3-152911	WebMD	Excel- Reaches	Pass
Disease Management Coaching	\$78.00	501	\$39,078.00	S3-152911	WebMD	Excel- Reaches	Pass

June 2021- Invoice Review

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Screening	\$55.00	260	\$14,300.00	S3-153020	Quest Diagnostics	INV0095120	Pass
Screening -No shows	\$55.00	78	\$4,290.00	S3-153020	Quest Diagnostics	INV0095120	Pass
Screening- Unmet Minimum	\$55.00	12	\$660.00	S3-153020	Quest Diagnostics	INV0095120	Pass
Screening- Lake County Fire & Rescue	\$250.00	1	\$250.00	S3-153020	Quest Diagnostics	INV0096654	Pass
Physician Forms	\$15.00	580	\$8,700.00	S3-153020	Total Wellness	22026	Pass
Home Test Kit Fulfillment	\$20.00	772	\$15,440.00	S3-153020	Quest Diagnostics	95120	Pass

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Home Test Kit Results	\$35.00	391	\$13,685.00	S3-153020	Quest Diagnostics	95120	Pass
Telephone/Coaching	\$46.00	2073	\$95,358.00	S3-153019	WebMD	Excel- Reaches	Pass
Disease Management Coaching	\$78.00	484	\$37,752.00	S3-153019	WebMD	Excel - Reaches	Pass
Wellness Platform	\$2.96	110884	\$328,216.64	S3-153022	WebMD	Excel SOWI Eligible May	Pass
Disease Management Program	\$1.87	110884	\$207,353.08	S3-153022	WebMD	Excel SOWI Eligible May	Pass

October 2021- Invoice Review

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Screening	\$55.00	203	\$11,165.00	S3-153496	Quest Diagnostics	INV0098214	Pass
Screening -No shows	\$55.00	50	\$2,750.00	S3-153496	Quest Diagnostics	INV0098214	Pass
Screening- Unmet Minimum	\$55.00	2	\$110.00	S3-153496	Quest Diagnostics	INV0098214	Pass
Physician Forms	\$15.00	542	\$8,130.00	S3-153496	Total Wellness	22600	Pass
Home Test Kit Fulfillment	\$20.00	803	\$16,060.00	S3-153496	Quest Diagnostics	98214	Pass
Home Test Kit Results	\$35.00	203	\$7,105.00	S3-153496	Quest Diagnostics	98214	Pass
Wellness Platform	\$2.96	109551	\$324,270.96	S3-153495	WebMD	Excel SOWI Eligible September	Pass
Disease Management Program	\$1.87	109551	\$204,860.37	S3-153495	WebMD	Excel SOWI Eligible September	Pass

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Telephone/Coaching	\$46.00	2629	\$120,934.00	S3-153493	WebMD	Excel- Reaches	Pass
Disease Management Coaching	\$78.00	680	\$53,040.00	S3-153493	WebMD	Excel- Reaches	Pass
Positively Me	\$335.00	134	\$44,890.00	S3-153493	WebMD	Excel- Weight Management- Positivity Me Engagement	Pass

November 2021- Invoice Review

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Screening	\$55.00	236	\$12,980.00	S3-153600	Quest Diagnostics	INV0100855	Pass
Screening -No shows	\$55.00	69	\$3,795.00	S3-153600	Quest Diagnostics	INV0100855	Pass
Screening- Unmet Minimum	\$55.00	12	\$660.00	S3-153600	Quest Diagnostics	INV0100855	Pass
Physician Forms	\$15.00	1390	\$20,850.00	S3-153600	Total Wellness	22994	Pass
Home Test Kit Fulfillment	\$20.00	1018	\$20,360.00	S3-153600	Quest Diagnostics	100855	Pass
Home Test Kit Results	\$35.00	571	\$19,985.00	S3-153600	Quest Diagnostics	100855	Pass
Flu Shot (unmet minimum)	\$33.00	368	\$12,144.00	S3-153600	Total Wellness	23080	Pass- Flu shots for calendar year 2021 were charged at \$33.00 per unit. Per the pricing contract Flu shots were to be charged at \$32.00 per unit. Upon

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
							inquiry, the State confirmed this price change, and a change form is in progress.
Flu Shot(Uninsured)	\$33.00	11	\$363.00	S3-153600	Total Wellness	23080	Pass- Flu shots for calendar year 2021 were charged at \$33.00 per unit. Per the pricing contract Flu shots were to be charged at \$32.00 per unit. Upon inquiry, the State confirmed this price change, and a change form is in progress
Flu Shots Additional Time	\$125.00	26	\$3,250.00	S3-153600	Total Wellness	23080	Pass
Flu shot Cancellation - Green Bay	\$330.00	1	\$330.00	S3-153600	Total Wellness	23080	Pass
Flu shot Cancellation - Mequon	\$165.00	1	\$165.00	S3-153600	Total Wellness	23080	Pass
Flu shot Cancellation -Madison	\$247.50	1	\$247.50	S3-153600	Total Wellness	23080	Pass
Screening Cancellation- Boscobel	\$550.00	1	\$550.00	S3-153600	Quest Diagnostics	INV0100855	Pass
Wellness Platform	\$2.96	110248	\$326,334.08	S3-153608	WebMD	Excel SOWI Eligible October	Pass
Disease Management Program	\$1.87	110248	\$206,163.76	S3-153608	WebMD	Excel SOWI Eligible October	Pass
Telephone/Coaching	\$46.00	2340	\$107,640.00	S3-153563	WebMD	Excel- Reaches	Pass
Disease Management Coaching	\$78.00	651	\$50,778.00	S3-153563	WebMD	excel- reaches	Pass

Category	PPU	Count	Total	Invoice#	Company	Vendor Document	Pass/Fail/Additional Comment
Positively Me	\$335.00	68	\$22,780.00	S3-153563	WebMD	Excel- Weight Management- Positivity Me Engagement	Pass

Additional Billing Findings

Segal identified in the three months of reviewing billing in calendar year 2020, 793 (\$11,985) physician forms were denied. Segal discussed with WebMD the process of a form being denied.

WebMD noted that if incomplete information (participant signature, blood pressure, height, weight, etc.) is received the physician form is denied. If denial occurs, the form can be resubmitted.

Segal notes that when the physician form is denied and then resubmitted again the State incurs an additional charge for the form to be reprocessed. This charge is equal to the original charge.

Segal recommends that the State review the charge of physician forms as it relates to the denial and resubmission with WebMD.

Section VI – WebMD’s Response to the Draft Report



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

July 28, 2022

Molly Dunks
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. Dunks,

This letter represents 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. WebMD provided an electronic data file of all wellness benefits processed and paid during the audit period of January 1, 2020 through December 31, 2020 and January 1, 2021 through December 31, 2021. 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 WebMD to assess day-to-day processing guidelines and wellness benefit control measures;
 - b. A random sample of 200 (100 from each calendar year) wellness benefit payments from January 1, 2020 through December 31, 2021 of all benefit payments processed during the audit period;
 - c. 50 (25 from each calendar year) target wellness benefit payments selection from January 1, 2020 through December 31, 2021 identified through electronic analyses designed to explore potential duplicate payments and file payment discrepancies;
 - d. An assessment of the Performance Guarantee data to measure reported performance guarantees against raw data; and
 - e. An assessment of billing activity from the months of July, October, and November in calendar year 2020; In calendar year 2021 May, June, October, and November.

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 random sample of 200 wellness benefit payments did not uncover any errors.
2. The target sample review discovered 14 findings; Only 3 of the findings were due to WebMD:
 - a. Three (3) transactions paid retiree members as active members due to when the activity was completed and not when the payment was made. WebMD's director of strategic accounts agreed with this error during the remote review. Segal notes that WebMD has acknowledged this error and appropriate coaching as well as monitoring should occur from WebMD.
 - b. Five (5) samples contained members whose eligibility terminated prior to the last activity being completed. WebMD noted that the eligibility on its side was still active at the time payment was distributed. The State confirmed that this issue was due to the State or Employer's eligibility entry date. The State confirmed that WebMD is not at fault for these transaction errors.
 - c. Six (6) samples contained members whose eligibility was active status at the time of payment but through the States eligibility records the member was noted as a retiree status at the time of payment. As the status was active at the time of payment, the FICA deduction was not applied. WebMD noted that it relies on the State's eligibility file and the eligibility file was noted as active at the time the payment was issued. The State confirmed that this issue was due to the State or Employer's eligibility entry date. The State confirmed that WebMD is not at fault for these transaction errors.
 - d. Turnaround time could not be measured as some benefit payments dispersed payment prior to the activity being completed within the data for calendar year 2020. For calendar year 2021 data the payment dates did not match.

- i. Segal notes that the data file for transactions provided by WebMD had many last activity dates post payment and the dates of payment were not a true representation of the actual paid date. As witnessed during the review, WebMD was able to provide the true and accurate payment date. Although this information was provided the data file was not a true representation of the actual paid date. Therefore, the turnaround time for payment could not be measured in calendar years 2020 and 2021.

WebMD Response:

1. Three (3) transactions paid retiree members as active members due to when the activity was completed and not when the payment was made. WebMD working with the State of WI on next steps from a tax perspective. This was an issue with the set-up and won't happen again in the future.
2. Regarding Segal's finding that the 2020 paid dates could not be measured: All dates were supplied to Segal, however select payment dates appeared to occur prior to activity completion dates for two primary reasons: (1) In August, the State of Wisconsin opted to make changes to the incentive program to allow for alternatives to the biometric screening. At this time, we restructured the rewards setup to categorize the activities. When these new overarching categories were awarded as a result of the change, they reflected an August date. (2) In June of 2020, WebMD experienced a challenge data issue that temporarily wiped tracking data from incentives. Once resolved, the activity completion date was updated to reflect the date of issue resolution. The State was notified of this issue on June 1, 2020. In all instances in which Segal inquired about conflicting dates, WebMD was able to validate the dates the activities were completed and incentives paid out.
3. Regarding the 2021 payment dates: the **first redemption file** for the 2021 calendar year was sent to the gift card administrator on February 22, 2021. That is why the image payment dates prior to February 22, 2021, do not match.

Performance Guarantee Review

WebMD Response

1. WebMD agrees with Segal's result review of the performance guarantees.

Incentive Card Review



WebMD Response

1. WebMD agrees with Segal's result review of the 2020 incentive card review. The eight files that were added manually and sent to the State of WI were due to the appeals process.
2. WebMD agrees with Segal's result review of the 2021 incentive card review.

Invoice Billing Review

WebMD Response

1. WebMD agrees with Segal's result review of the 2020 and 2021 invoice review.

Summary

WebMD will continue to partner with the State of Wisconsin to ensure payment to participants is based on the eligibility file as that is the source of truth from a data perspective. In addition, we will continue to track and measure contractual performance guarantees based on what has been agreed to by the State of WI. Servicing the State of Wisconsin population is of utmost importance to WebMD.

Sincerely,

Emily Rathjen

Emily Rathjen

Director, Strategic Accounts - WebMD Health Services