

Finding #	Area of Focus	Recommendation	Action(s) Taken/ To Be Taken	Check Completion	Start Date	End Date	Responsible	Estimated Completion Date	Status
1	Reporting Concerns – Plan Finalization Report and Unsubstantiated Claims Business Debt Report	<ul style="list-style-type: none"> <li>Optum to develop, document, and implement procedures to adequately compile and review the Plan Finalization Report and Unsubstantiated Claims Business Debt Report, such as conducting reviews based on risk and reconciling to other program reports or data, to ensure these reports are materially correct, provided timely, and information is comprehensible when provided to ETF.</li> </ul>	1) To ensure consistency and quality controls are in place, the responsibility for the production and updating of the Plan Finalization Report and the Unsubstantiated Claims Business Debt Report was taken over by the Relationship Executive to research and resolve errors and discrepancies.	<input checked="" type="checkbox"/>	May 1, 2021	April 30, 2022	Optum Financial	April 30, 2022	Completed
			2) Optum will develop, document, and implement procedures to adequately compile and review the Plan Finalization Report and Unsubstantiated Claims Business Debt Report.	<input type="checkbox"/>	October 1, 2022		Optum Financial	August 31, 2023	In-Progress
			3) A secondary independent audit of the Plan Finalization Report and Unsubstantiated Claim Business Debt Report will be performed prior to distribution.	<input checked="" type="checkbox"/>	October 1, 2022	May 1, 2023	Optum Financial	May 31, 2023	Completed
			4) Develop Pre-Tax Management Plan to lay out Optum’s responsibilities and the respective due dates to ensure timely delivery to include these reports.	<input checked="" type="checkbox"/>	September 1, 2021	November 30, 2022	ETF	November 30, 2022	Completed
2	ERA and CB Claims Substantiation	<ul style="list-style-type: none"> <li>Optum to evaluate and determine the cause for the ineligible claims identified by the audit and ensure appropriate steps are taken;</li> <li>Improve controls, such as performing audits of claims based on risk, to ensure claim substantiation requirements are adhered to; and</li> <li>Document claim substantiation requirements that are clear and consistent throughout program administration manuals, claims forms, and program materials and process claims in accordance with these substantiation requirements.</li> </ul>	1) Substantiation requirements for eligible expenses detailed in the program administrative manual; on claims forms; and in program materials have been reviewed for the 2023 plan year and updated for consistency. As materials are updated for future plan years, ETF and Optum will review to ensure consistency across all materials.	<input checked="" type="checkbox"/>	September 1, 2022	December 31, 2022	Optum Financial	December 31, 2022	Completed
			2) Examples and details of inconsistencies in the documented substantiation requirements when processing claims has been shared with Optum Claims Leadership for internal follow-up and training opportunities.	<input checked="" type="checkbox"/>	January 1, 2023	July 21, 2023	Optum Financial	September 30, 2023	Completed
			3) Responsibility and oversight for the auditing of claims has been moved from under the Optum Claims Team to the Optum Quality Center of Excellence to provide thoroughness and accountability and ensure the independence and integrity of the process. In addition, the Optum Quality Center of Excellence randomly audits 25 State of Wisconsin claims each month.	<input checked="" type="checkbox"/>	January 1, 2022	July 30, 2022	Optum Financial	December 31, 2022	Completed
			4) Optum took additional steps to coach claims adjudicators and implemented a daily claims adjudication monitoring process. Optum increased the monitoring of claims adjudication to as much as a 100% for lesser experienced or newly hired staff.	<input checked="" type="checkbox"/>	September 1, 2021	July 30, 2022	Optum Financial	July 30, 2022	Completed
			5) Optum will perform quarterly audits based on risk, to ensure the claim substantiation requirements are adhered to.	<input checked="" type="checkbox"/>	January 1, 2023	July 21, 2023	Optum Financial	June 30, 2023	Completed
3	Program Discrepancies – Contribution Limits and HSA Eligibility	<ul style="list-style-type: none"> <li>Optum to follow-up with payroll centers timely to resolve program discrepancies to ensure participant elections are met, contribution limits are not exceeded, and HSA eligibility requirements are met; and</li> <li>Seek assistance from ETF when necessary in resolving program discrepancies with the payroll centers.</li> </ul>	1) To ensure identified corrections/updates were made and to confirm the status of any new hires, Optum proposes an additional audit be completed in September of each plan year.	<input type="checkbox"/>	November 1, 2022		Optum Financial	September 30, 2023	In-Progress
			2) The ‘Projected Contributions’ report for each Payroll Center was moved to a quarterly cadence to give Payroll Centers ample time to make necessary election, contribution and/or enrollment adjustments earlier and throughout the plan year.	<input checked="" type="checkbox"/>	November 1, 2021	March 31, 2022	Optum Financial	March 31, 2022	Completed
			3) Optum will rerun ‘Projected Contributions’ reports to confirm all discrepancies have been resolved by the Payroll Centers each quarter in 2023 plan year.	<input type="checkbox"/>	March 1, 2023	December 31, 2023	Optum Financial	December 31, 2023	In-Progress
4	Quarterly Performance Standards Reporting	<ul style="list-style-type: none"> <li>Optum to develop and document written procedures to compile the Quarterly Performance Standards Report in compliance with required reporting definitions;</li> <li>Implement a report review process to ensure the Quarterly Performance Standards Report is accurate; and</li> <li>Implement a process to ensure records are maintained as required by the pre-tax savings account contracts.</li> <li>ETF request supporting documentation for Quarterly Performance Standards Reports and perform sample verifications to ensure additional accountability over contract performance; and</li> <li>Determine whether any performance standards should be reported retroactively, applying required reporting definitions for the Quarterly Performance Standards Reports for prior periods, and assess whether any penalties are warranted.</li> </ul>	1) The measurement of claims performance standards has been moved to the Optum Quality Center of Excellence and the measurement of the non-claims related performance standards has been moved to the Operational Excellence Team to formalize the process and standardize reporting and data retention.	<input checked="" type="checkbox"/>	February 1, 2023	July 31, 2022	Optum Financial & ETF	June 30, 2023	Completed
			2) Optum will engage internal teams to ensure the proper reporting methodology and definitions are being used to measure and report the performance standards and will coordinate with ETF to detail requirements and expectations to ensure the Quarterly Performance Standards Report is accurate.	<input type="checkbox"/>	February 1, 2023		Optum Financial & ETF	June 30, 2023	In-Progress
			3) ETF and Optum will review the performance standards in the contracts to determine if appropriate measures are being used and to add clarity to the measures and penalty calculations. Also, ETF will evaluate penalties associated with the performance standards and deliverables to determine if an increase in a penalty(ies) may be appropriate. Optum will continue to adhere to the performance standards agreed upon in the contracts. ETF will work with Optum as they implement a process to ensure records are maintained as required under the contracts.	<input type="checkbox"/>	February 1, 2023		Optum Financial & ETF	June 30, 2023	In-Progress
5	Performance Standards Penalties	<ul style="list-style-type: none"> <li>ETF evaluate Optum Financial’s failure to meet performance standards in accordance with the associated penalties stated in the pre-tax savings account contracts.</li> </ul>	1) ETF and Optum will review the performance standards in the contracts to determine if appropriate measures are being used and to add clarity to the measures and penalty calculations. Also, ETF will evaluate penalties associated with the performance standards and deliverables to determine if an increase in a penalty(ies) may be appropriate. Optum will continue to adhere to the performance standards agreed upon in the contracts. ETF will review all performance reports and assess penalties as required.	<input type="checkbox"/>	February 1, 2023		ETF	June 30, 2023	In-Progress
6	Optum Secure File Transfer Protocol Access	<ul style="list-style-type: none"> <li>Optum to facilitating timely monitoring of SFTP user accounts;</li> <li>Implementing a process to remove all files timely on its SFTP; and</li> <li>Requiring SFTP account passwords to be changed on a regular basis and when users terminate or change job duties.</li> </ul>	1) SFTP user account confirmation request has been added to the monthly ‘Employer Dashboard Check-In’ email to each Payroll Center.	<input checked="" type="checkbox"/>	September 1, 2022	November 30, 2022	Optum Financial	November 30, 2022	Completed
			2) When an account is identified by a Payroll Center as no longer needed, the account will be immediately disabled and the SFTP password for the Payroll Center will be changed.	<input checked="" type="checkbox"/>	September 1, 2022	November 30, 2022	Optum Financial	November 30, 2022	Completed
			3) The SFTP account password for each Payroll Center will be changed at least annually or when Optum is notified that a user has terminated, changed job duties or their SFTP access is no longer needed.	<input checked="" type="checkbox"/>	September 1, 2022	February 28, 2023	Optum Financial	January 31, 2023	Completed
			4) File error reports will be removed from the SFTP every 2 weeks.	<input checked="" type="checkbox"/>	September 1, 2022	December 6, 2022	Optum Financial	November 30, 2022	Completed