Finding #	Area of Focus	Recommendation	Action(s) Taken/ To Be Taken	Check Completion	Start Date	End Date	Responsible	Estimated Completion Date	Status
	ERA and CB Claims	Optum Financial:	(1) Secondary Review of Pended and Denied Claims – All pended /denied				Optum		
1	Substantiation	(A) Evaluate the cause for the claims that were inappropriately	claims are reviewed by claims processing staff for accuracy.	\checkmark	December 1, 2024	December 17, 2024	Financial	December 31, 2025	Completed
		Direction of the contract of t	(2) Sample Review of Approved Claims – Regular sample reviews of				Tillallolal		
		be identified by Optum Financial's claims audits and determine	approved claims are performed to maintain high standards of accuracy and	\checkmark	December 1, 2024	December 17, 2024	Optum	December 31, 2025	Completed
		appropriate corrective action to be taken to improve controls over	consistency in our approvals.		December 1, 2024	December 17, 2024	Financial	December 61, 2020	Completed
		adjudicating claims by responsible parties.	(3) Quarterly Refresher Trainings for All Processors – Optum provide				0-4		
			quarterly refresher training sessions for all claims processors to keep them	$\overline{\checkmark}$	December 1, 2024	December 17, 2024	Optum Financial	December 31, 2025	Completed
			updated on the latest policies, procedures, and best practices.				Financial		
			(4) Assessment of Penalties – ETF will evaluate whether additional penalties						
		(C) 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 documented substantiation requirements. ETF: (A) consider whether any penalties are warranted for the audit	are warranted based on the findings from the claims review, with the goal of		February 1, 2025		ETF	June 30, 2025	In-Progress
			ensuring Optum improves the claims processing accuracy performance					04110 00, 2020	g. 000
			standards.						
			(5) Claims Adjudicator Training — Optum will work with the subcontractor responsible for claims processing to deliver additional training related to claims						
			substantiation. This training will emphasize the importance of consistency in		Echruany 1 2025		Optum	March 31, 2025	In-Progress
			validating claims expenses and ensuring compliance with proper documentation		February 1, 2025		Financial	Watch 31, 2023	III-FTOGTESS
			requirements.				i indiroidi		
			(6) Internal SOP Documents – Optum will work with the subcontractor to						
		of improvement as identified by the prior audit.	update their internal documentation appropriately to be in alignment with current		February 1, 2025		Optum	June 30, 2025	In-Progress
			IRS substantiation requirements and ETF contract requirements.		, ,		Financial		
	Quarterly	Optum Financial:	(1) Supporting Documentation Discrepancies - ETF requested a sampling						
	Performance	(A) Develop and document procedures to compile the Quarterly	of supportive documentation for the 2024 plan year performance standards for		February 1, 2025		ETF	March 31, 2025	In-Progress
	Standards Reporting	Performance Standards Report in compliance with required	review and will address any discrepancies.			<u> </u>			
	Deficiencies		(2) Staff Training – Optum will conduct training sessions with relevant staff on				Optum		
			updated protocols to ensure consistency and accuracy in future reporting.	$\overline{\checkmark}$	February 1, 2025	April 23, 2025	Financial	May 1, 2025	Completed
			(0) 4 (7) 7 (7)						
			(3) Audit Trail Requirements – Optum will establish a standardize format for maintaining and storing supporting documentation, ensuring traceability to		March 1 2025		Optum	June 30, 2025	In-Progress
			reported values on the performance standards.		March 1, 2025		Financial	Julie 30, 2023	m-Frogress
		required by the pre-tax savings account contracts and can be	(4) Documentation – Optum will develop and implement detailed written						
		provided to ETF to allow for timely monitoring and validation of performance standards.	procedures outlining data sources, calculation methodologies, and reconciliation	\overline{V}	April 1, 2025	April 23, 2025	Optum	September 30, 2025	Completed
			steps for each performance metric.			, ,	Financial		
			(5) Penalties for Supporting Documentation – ETF is planning to introduce						
2		ETF:	penalties for insufficient or missing supporting documentation in the upcoming		March 1, 2025		ETF	June 30, 2023	In-Progress
		(A) Require supporting documentation to be submitted by Optum Financial with the Quarterly Performance Standards Reports or as requested by ETF and consider a contract penalty for instances	contracts.						
			(6) Data Values Review - Optum will review the values used for Processing				Optum		
			Accuracy and Financial Accuracy to ensure they align with contractual		February 1, 2025		Financial	March 31, 2025	In-Progress
		when requests for supporting documentation are not timely or	requirements.				Tinanolai		
		accurately provided to ensure additional accountability over	(7) Validation Measures – Optum will cross examine all quarterly performance		March 1, 2025		Optum		
		contract performance.	standard reports and supporting documentation validation to ensure the				Financial	June 30, 2025	In-Progress
			accuracy and reliability of underlying data.				Tillalicial		
		(B) Perform regular reviews or sample verifications of performance	(8) System Adjustments – Optum will assess their reporting system's ability to						i i
		standards.	separate plan-level data from book-of-business data. Optum will also inform ETF						
		(C) Assess which performance standards can and should be	about which performance standards can be reported at the plan level versus	g \square	March 1, 2025		Optum Financial	June 30, 2025	In-Progress
		reported at plan-level or book-of-business and whether Optum Financial can accommodate this.	those reported at the book-of-business level. ETF will evaluate Optum's reporting						
			capabilities alongside ETF's business needs to determine the appropriate next						
			steps based on findings.						
			(9) Submission Process Review - Optum will implement a minimum of two				Optum	1	
		performance standard requiring Optum Financial to address areas	levels of review for the quarterly performance standard reports before submitting them to ETF.	\checkmark	February 1, 2025	April 23, 2025	Financial	March 31, 2025	Completed
		of improvement as identified by the prior audit.	them to ETF.						
			(10) Version Control Policy – Optum will establish a robust version control				Optum		
1			system to track updates and ensure that only the finalized version of the report is	\checkmark	February 1, 2025	April 23, 2025	Financial	March 31, 2025	Completed
			submitted to ETF.						
			(11) Document Retention – A centralized repository will be created by Optum to		Februari 4 0005	April 20, 2005	Optum	March 24, 2005	Completed
			maintain a clear and organized record of report versions and revisions.	Ĭ <u>V</u>	February 1, 2025	April 23, 2025	Financial	March 31, 2025	Completed

Finding #	Area of Focus	Recommendation	Action(s) Taken/ To Be Taken	Check Completion	Start Date	End Date	Responsible	Estimated Completion Date	Status
	Administrative Fee Invoicing	Optum Financial: (A) Optum determine the cause of the system billing errors and implement corresponding corrective action to address the cause	(1) Recovering Overpayments — OSHP Program Manager will work with Optum to recover the \$1,934.04 overpaid for the June 2022 administrative fee invoice.	\checkmark	December 1, 2024	January 13, 2025	ETF	January 31, 2025	Completed
	of the error. We also recommend Optum Financial improve its review of administrative fee invoices to ensure the accuracy of administrative fee invoicing by reconciling system generated invoicing data to the final administrative fee invoice.	(2) Review of 2022-2024 Administrative Fees – Optum to perform an audit review of all 2022-2024 administrative fees for duplicates and ensure that billing was done correctly.	V	December 1, 2024	January 13, 2025	Optum Financial	January 31, 2025	Completed	
3		ETF: (A) Improve its monthly review of administrative fee invoicing received from Optum Financial which could include a review of the percentage change in participants per month and a review for duplicates to ensure the accuracy of administrative fees billed to ETF.	(3) Additional Review of Invoice — Each month when the invoice is provided by Optum, OSHP Program Manager will validate the billing to ensure there are no duplicates in the invoice starting on the December 2024 invoice.	V	December 1, 2024	December 26, 2024	ETF	December 31, 2024	Completed
			(4) Perform Percentage Changes – OSHP Program Manager will calculate the percentage change between the prior and current monthly invoice each month. Any percentage change of 2% (above or below) will be investigated further to identify the cause of the potential increase or decrease.	V	December 1, 2024	December 26, 2024	ETF	December 31, 2024	Completed
		(B) ETF seek to recover \$1,934.04 overpaid to Optum Financial for the June 2022 administrative fee invoice.							