Finding #	Area of Focus	Recommendation	Action(s) Taken/	Check Completion	Start Date	End Date	Responsible	Estimated	Status
	ERA and CB Claims	Optum Financial:	To Be Taken (1) Secondary Review of Pended and Denied Claims – All pended /denied				Optum	Completion Date	
1	Substantiation	(A) Evaluate the cause for the claims that were inappropriately approved, denied, or transferred as identified by our audit and to be identified by Optum Financial's claims audits and determine appropriate corrective action to be taken to improve controls over adjudicating claims by responsible parties.	claims are reviewed by claims processing staff for accuracy.	\checkmark	December 1, 2024	December 17, 2024	Financial	December 31, 2025	Completed
			(2) Sample Review of Approved Claims – Regular sample reviews of	V	December 1, 2024	December 17, 2024	Optum Financial	December 31, 2025	0
			approved claims are performed to maintain high standards of accuracy and consistency in our approvals.						Completed
			(3) Quarterly Refresher Trainings for All Processors – Optum provide				Optum		
		(B) Assess the results and timeliness of corrective action that is	quarterly refresher training sessions for all claims processors to keep them updated on the latest policies, procedures, and best practices.	\checkmark	December 1, 2024	December 17, 2024	Financial	December 31, 2025	Completed
			(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.	are warranted based on the findings from the claims review, with the goal of	$\overline{\checkmark}$	February 1, 2025	July 16, 2025	ETF	June 30, 2025	Completed
			ensuring Optum improves the claims processing accuracy performance 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	V	February 1, 2025	May 22, 2025	Optum Financial	March 31, 2025	Completed
		ETF: (A) consider whether any penalties are warranted for the audit performance standard requiring Optum Financial to address areas of improvement as identified by the prior audit.	validating claims expenses and ensuring compliance with proper documentation						
			requirements.						
			update their internal documentation appropriately to be in alignment with current		February 1, 2025		Optum	September 30, 2025	In-Progress
			IRS substantiation requirements and ETF contract requirements.		i-ebiuary 1, 2025		Financial	Ocptomber 60, 2020	III-I Togress
	Quarterly Performance	Performance Standards Report in compliance with required reporting definitions.	(1) Supporting Documentation Discrepancies – ETF requested a sampling of supportive documentation for the 2024 plan year performance standards for		February 1, 2025		ETF	September 30, 2025	In-Progress
	Standards Reporting		review and will address any discrepancies.		, ,				
	Deficiencies		(2) Staff Training – Optum will conduct training sessions with relevant staff on updated protocols to ensure consistency and accuracy in future reporting.	\checkmark	February 1, 2025	April 23, 2025	Optum	May 1, 2025	Completed
		(B) Implement a report review process to ensure the Quarterly Performance Standards Reports are timely and accurate.	, , , , ,	\perp	, ,		Financial		•
			(3) Audit Trail Requirements – Optum will establish a standardize format for maintaining and storing supporting documentation, ensuring traceability to	\overline{V}	March 1, 2025	May 22, 2025	Optum	June 30, 2025	Completed
		(C) Implement a process to ensure records are maintained as required by the pre-tax savings account contracts and can be provided to ETF to allow for timely monitoring and validation of performance standards.	reported values on the performance standards.		-,	, ,	Financial		,
			(4) Documentation – Optum will develop and implement detailed written 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.		7,011 1, 2020	7.0 20, 2020	Financial	Coptombol Co, 2020	Completed
			(5) Penalties for Supporting Documentation – ETF is planning to introduce penalties for insufficient or missing supporting documentation in the upcoming	\checkmark	March 1, 2025	July 16, 2025	ETF	June 30, 2023	Completed
		ETF: (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 when requests for supporting documentation are not timely or accurately provided to ensure additional accountability over contract performance.	contracts.		March 1, 2025	July 16, 2025	EIF	June 30, 2023	Completed
			(6) Data Values Review – Optum will review the values used for Processing	\checkmark	February 1, 2025	May 22, 2025	Optum Financial	March 31, 2025	
2			Accuracy and Financial Accuracy to ensure they align with contractual requirements.						Completed
			(7) Validation Measures – Optum will cross examine all quarterly performance			+		-	
-			standard reports and supporting documentation validation to ensure the	\checkmark	March 1, 2025	May 22, 2025	Optum Financial	June 30, 2025	Completed
			accuracy and reliability of underlying data.				Filianciai		-
		standards.	(8) System Adjustments – Optum will assess their reporting system's ability to separate plan-level data from book-of-business data. Optum will also inform ETF	F CZ	March 1, 2025	May 22, 2025	Optum Financial	June 30, 2025	
			about which performance standards can be reported at the plan level versus						
			ose reported at the book-of-business level. ETF will evaluate Optum's reporting						Completed
			capabilities alongside ETF's business needs to determine the appropriate next steps based on findings.						
		performance standard requiring Optum Financial to address areas of improvement as identified by the prior audit.	(9) Submission Process Review – Optum will implement a minimum of two				 		
			levels of review for the quarterly performance standard reports before submitting	\checkmark	February 1, 2025	April 23, 2025	Optum	March 31, 2025	Completed
			them to ETF.				Financial		
			(10) Version Control Policy – Optum will establish a robust version control		F-1 1 000-	A = =1 00 0005	Optum	M	0
			system to track updates and ensure that only the finalized version of the report is submitted to ETF.	$\overline{\mathbf{V}}$	February 1, 2025	April 23, 2025	Financial	March 31, 2025	Completed
			(11) Document Retention – A centralized repository will be created by Optum to) [7	F.I. 4.000-	4 1100 0007	Optum	14 1 04 0007	
			maintain a clear and organized record of report versions and revisions.		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
3	Administrative Fee Invoicing (A) Optum determine the cause of the system billing errors and implement corresponding corrective action to address the cause 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. 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. (B) ETF seek to recover \$1,934.04 overpaid to Optum Financial for the June 2022 administrative fee invoice.	(1) Recovering Overpayments – OSHP Program Manager will work with Optum to recover the \$1,934.04 overpaid for the June 2022 administrative fee invoice.		December 1, 2024	January 13, 2025	ETF	January 31, 2025	Completed	
		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. 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. (B) ETF seek to recover \$1,934.04 overpaid to Optum Financial	(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.		December 1, 2024	January 13, 2025	Optum Financial	January 31, 2025	Completed
			(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.		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 1% (above or below) will be investigated further to identify the cause of the potential increase or decrease.	\checkmark	December 1, 2024	December 26, 2024	ETF	December 31, 2024	Completed