

Finding #	Area of Focus	Recommendation	Action(s) Taken/ To Be Taken	Check Completion	Start Date	End Date	Responsible	Estimated Completion Date	Status
1	ERA and CB Claims Substantiation	Optum Financial: (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. (B) Assess the results and timeliness of corrective action that is implemented to determine its effectiveness. (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 performance standard requiring Optum Financial to address areas of improvement as identified by the prior audit.	(1) Secondary Review of Pended and Denied Claims – All pended /denied claims are reviewed by claims processing staff for accuracy.	✓	December 1, 2024	December 17, 2024	Optum Financial	December 31, 2025	Completed
			(2) Sample Review of Approved Claims – Regular sample reviews of approved claims are performed to maintain high standards of accuracy and consistency in our approvals.	✓	December 1, 2024	December 17, 2024	Optum Financial	December 31, 2025	Completed
			(3) Quarterly Refresher Trainings for All Processors – Optum provide quarterly refresher training sessions for all claims processors to keep them updated on the latest policies, procedures, and best practices.	✓	December 1, 2024	December 17, 2024	Optum Financial	December 31, 2025	Completed
			(4) Assessment of Penalties – ETF will evaluate whether additional penalties are warranted based on the findings from the claims review, with the goal of ensuring Optum improves the claims processing accuracy performance standards.	✓	February 1, 2025	July 16, 2025	ETF	June 30, 2025	Completed
			(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 validating claims expenses and ensuring compliance with proper documentation requirements.	✓	February 1, 2025	May 22, 2025	Optum Financial	March 31, 2025	Completed
			(6) Internal SOP Documents – Optum will work with the subcontractor to update their internal documentation appropriately to be in alignment with current IRS substantiation requirements and ETF contract requirements.	✓	February 1, 2025	October 6, 2025	Optum Financial	September 30, 2025	Completed
2	Quarterly Performance Standards Reporting Deficiencies	Optum Financial: (A) Develop and document procedures to compile the Quarterly Performance Standards Report in compliance with required reporting definitions. (B) Implement a report review process to ensure the Quarterly Performance Standards Reports are timely and accurate. (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. 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. (B) Perform regular reviews or sample verifications of performance standards. (C) Assess which performance standards can and should be reported at plan-level or book-of-business and whether Optum Financial can accommodate this. (D) 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.	(1) Supporting Documentation Discrepancies – ETF requested a sampling of supportive documentation for the 2024 plan year performance standards for review and will address any discrepancies.	✓	February 1, 2025	October 6, 2025	ETF	September 30, 2025	Completed
			(2) Staff Training – Optum will conduct training sessions with relevant staff on updated protocols to ensure consistency and accuracy in future reporting.	✓	February 1, 2025	April 23, 2025	Optum Financial	May 1, 2025	Completed
			(3) Audit Trail Requirements – Optum will establish a standardize format for maintaining and storing supporting documentation, ensuring traceability to reported values on the performance standards.	✓	March 1, 2025	May 22, 2025	Optum Financial	June 30, 2025	Completed
			(4) Documentation – Optum will develop and implement detailed written procedures outlining data sources, calculation methodologies, and reconciliation steps for each performance metric.	✓	April 1, 2025	April 23, 2025	Optum Financial	September 30, 2025	Completed
			(5) Penalties for Supporting Documentation – ETF is planning to introduce penalties for insufficient or missing supporting documentation in the upcoming contracts.	✓	March 1, 2025	July 16, 2025	ETF	June 30, 2023	Completed
			(6) Data Values Review – Optum will review the values used for Processing Accuracy and Financial Accuracy to ensure they align with contractual requirements.	✓	February 1, 2025	May 22, 2025	Optum Financial	March 31, 2025	Completed
			(7) Validation Measures – Optum will cross examine all quarterly performance standard reports and supporting documentation validation to ensure the accuracy and reliability of underlying data.	✓	March 1, 2025	May 22, 2025	Optum Financial	June 30, 2025	Completed
			(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 about which performance standards can be reported at the plan level versus 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.	✓	March 1, 2025	May 22, 2025	Optum Financial	June 30, 2025	Completed
			(9) Submission Process Review – Optum will implement a minimum of two levels of review for the quarterly performance standard reports before submitting them to ETF.	✓	February 1, 2025	April 23, 2025	Optum Financial	March 31, 2025	Completed
			(10) Version Control Policy – Optum will establish a robust version control system to track updates and ensure that only the finalized version of the report is submitted to ETF.	✓	February 1, 2025	April 23, 2025	Optum Financial	March 31, 2025	Completed
			(11) Document Retention – A centralized repository will be created by Optum to maintain a clear and organized record of report versions and revisions.	✓	February 1, 2025	April 23, 2025	Optum Financial	March 31, 2025	Completed
3	Administrative Fee Invoicing	Optum Financial: (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
			(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.	✓	December 1, 2024	December 26, 2024	ETF	December 31, 2024	Completed