



COMMONWEALTH of VIRGINIA

Department of Medical Assistance Services

KAREN KIMSEY
DIRECTOR

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September 7, 2021

Jerry Mammano
AETNA Better Health of Virginia
9881 Mayland Drive
Richmond, VA 23233

Re: Commonwealth Coordinated Care Plus (CCC Plus) Program – Corrective Action Plan (CAP)
– Erroneous Submission of files to production environment – Case ID # 19947

Dear Mr. Mammano,

On May 27, 2021, Aetna Better Health of Virginia (Aetna) submitted four (4) SA Medical files to CRMS Production without approval from DMAS. The files loaded or updated 84,819 transactions into the production environment. The efforts by DMAS to remedy this mistake took over a month and involved DMAS staff from CRMS, Enterprise Data Warehouse Solution (EDWS), Information Management, and Business areas. This led to a critical impact on deliverables for the Medicaid Enterprise System (MES) in August.

In lieu of seeking compliance action and sanctions, DMAS requested Aetna take the necessary precautions and have processes in place to ensure files are submitted to the Trading Partner Testing (TPT) environment and not to the production environment. Aetna provided communication on June 2, 2021, that these controls would be in place and such an incident would not occur again.

On August 27, 2021, Aetna failed to prevent such an incident and submitted two (2) SA Medical files to CRMS production which both files fully rejected. Aetna then corrected the full file rejection issue and re-submitted the two (2) SA Medical files back to CRMS production. SA Medical files were submitted on two separate occasions to CRMS production without approval from DMAS. Aetna indicated the two (2 SA Medical) files submitted on August 27, 2021 were generated prematurely and file validations were not completed prior to submitting to production. This incident will again lead to inaccurate data in the production environment and delays to critical projects for DMAS while the error is addressed. DMAS is meeting internally to assess the full impact and will advise Aetna of any necessary actions to correct the issue.

Due to the failure to implement proper internal controls and avoid the erroneous submission of test files into the production environment, Aetna must document and implement a Corrective Action Plan (CAP) that provides DMAS 1) a full report of policies, procedures, and technical safeguards in place to prevent test files from being loaded to the production environment, 2) a full analysis on which component of these internal controls failed, and 3) what steps will be implemented to establish a preventative internal control process. Please submit this information no later than 5:00 PM September 22, 2021. All issues must be resolved prior to October 8, 2021 and daily load approval by DMAS is required. A weekly update to DMAS will be required for monitoring progress. Failure to comply with the approved CAP will result in additional sanctions.

Aetna will be issued a 5 point violation and \$5,000 financial penalty pursuant to Section 18.0 of the CCC Plus Contract. Assessment of these points are pending. If you have additional information and/or documentation that will affect this determination, please provide this information to Jason A. Rachel, Ph. D., Division Director, within 15 calendar days from the date of this letter (“Comment Period”). Point violations will be finalized upon the expiration of the Comment Period. After this time, no additional communication will be provided by DMAS regarding the point issuance.

If you have any questions regarding these concerns, contract standards or CAP requirements, please contact the CCC Plus Compliance Team at ccpluscompliance@dmas.virginia.gov and Sandra Dagenhart at sandra.dagenhart@dmas.virginia.gov. Please sign, date and return acknowledging receipt to ccpluscompliance@dmas.virginia.gov.

Sincerely,

DocuSigned by:





Brian Campbell
Acting Deputy Director of Complex Care

Exhibit 1 – Aetna – 2021 Point Schedule

<u>MCO</u>	<u>Area(s) of Violation</u>	<u>Previous Balance</u>	<u>Point(s) Expired</u>	<u>Point(s) Incurred</u>	<u>Current Balance</u>	<u>Sanctions pursuant to 18.2.2</u>
AETNA Better Health of Virginia		6	0	5	11	\$5,000

Acknowledge agreement via signature below to address the erroneous submission of files to production environment noted within the attached CAP letter.

Jerry Mammano /Date