

The background features a blurred medical scene with a person lying down. A large green cross is centered over the person. Various medical icons are overlaid in a light green color, including a syringe, a pill, a virus, a stethoscope, and a group of people. A dark grey diagonal shape is on the right side of the page.

HEALTHKEEPERS, INC.

Virginia Department of Medical
Assistance Services

Managed Care Organization (MCO)
Administrative Expenses

With Independent Accountant's Report Thereon

For the Calendar Year Ending December 31, 2022



**MYERS AND
STAUFFER** L.C.
CERTIFIED PUBLIC ACCOUNTANTS



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Independent Accountant's Report

Virginia Department of Medical Assistance Services
Richmond, VA

We have performed the procedures enumerated in Appendix A on the administrative expenses for HealthKeepers, Inc. for the period of January 1, 2022 through December 31, 2022. We applied these procedures to assist you with respect to analyzing administrative expenses for Medicaid rate development. The above referenced Managed Care Organization (MCO)'s management is responsible for the accuracy and completeness of the financial information.

The Virginia Department of Medical Assistance Services (Department) has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of analyzing administrative expenses for Medicaid rate development. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

Our procedures are contained within Appendix A and our findings are contained in Appendices B through D. As agreed, materiality limits were applied as specified within the Agreed-Upon Procedures Program.

We were engaged by the Department to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion on the MCO's administrative expenses. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the MCO and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the Department, as the oversight agency for the Virginia Medicaid program and Mercer as the State's actuary for managed care rate setting, and is not intended to be, and should not be, used by anyone other than these specified parties.

Myers and Stauffer LC
Glen Allen, VA
May 18, 2023



Appendix A: Agreed Upon Procedures

Preliminary Work

- 1) Conduct an entrance call with DMAS and Mercer, DMAS' actuary for MCO rate setting. Gain an understanding of information needed by Mercer for rate setting purposes. Determine if either DMAS or Mercer have initial concerns requiring special attention.
- 2) Send an initial request list to each MCO to include, but not limited to, a survey containing a questionnaire, Board of Directors minutes, organizational charts, working trial balance, adjusting journal entries, audited financial statements, reconciliation of the working trial balance and the quarterly reporting, support for the allocation of administrative expenses and net premium income to the Medicaid line of business and between each Medicaid product, cost allocation worksheet summarizing quarterly reporting information and MCO reported adjustments, schedule of related-party transactions, related-party agreements, narrative surrounding reinsurance reporting, etc.
- 3) Conduct an entrance call with appropriate MCO personnel to include (a) determination of MCO personnel who should be contacted during the course of our procedures for information, explanations, documents, etc., and (b) location and availability of the information requested.
- 4) Briefly document the entity's accounting procedures and internal control per MCO responses on the survey. Emphasis should be placed on the ability of the system(s) to generate reliable cost, revenue, and statistical information.
- 5) Read Board of Directors minutes from the beginning of the report period through the current date. Document matters impacting the scope of these procedures such as discussions related to administrative costs and non-allowable or non-recurring costs as described in Step 16. Obtain copies or excerpts of pertinent sections, and file in work papers. Cross-reference matters discussed in the minutes to the related work papers.
- 6) Obtain the audited financial statements including related footnotes. Document matters impacting the scope of these procedures such as the opinion, notes that may provide information regarding non-allowable or non-recurring costs as described in Step 16, and/or related parties.
- 7) Obtain the names of all related parties from the MCO. Inspect the organizational chart, the annual statement submitted to the Virginia Bureau of Insurance (annual statement), and audited financial statements for related parties not identified by the MCO.
- 8) Obtain the names of all delegated vendors from the MCO. Inspect the organizational chart, the annual statement, and audited financial statements for delegated vendors not identified by the MCO.
- 9) Consider whether any specific information has come to our attention concerning the existence of possible fraud or prohibited acts. Fraud risk factors for this procedure include: discrepancies in accounting records, conflicting or missing evidential matter, threatened financial stability or



profitability, and lack of an effective corporate compliance program. If fraud risk factors are identified, document those risk factors or conditions and our response to them.

Trial Balance Reconciliation

- 10) Reconcile total expenses and total administrative expenses per the adjusted trial balance as of December 31, 2022 to the annual statement for the year ended December 31, 2022 and the quarterly filing required by the Department.
- 11) Obtain the adjusted trial balance as of December 31, 2022. For a sample of 20 accounts, trace the account titles, account numbers, and ending balances for the administrative expenses per the adjusted trial balance to the general ledger for the year ended December 31, 2022.
- 12) Obtain the year-end adjusting journal entries recommended by the independent accountant for the year ended December 31, 2022. Inspect the entries affecting administration expense accounts for propriety. Ensure postings of adjustments to the trial balance, if adjusting journal entries have not been posted to the general ledger at year end.

Administrative Expenses

- 13) Determine how the MCO allocated the administration expenses and net premium income among the various lines of business. Determine how the MCO allocated the administration expenses for the Medicaid line of business to Medallion 4.0, CCC Plus, and any other products included by the MCO in the Medicaid line of business. Determine if any trial balance accounts are allocated between administration and medical expenses.
 - a. Document this understanding through a narrative.
 - b. Document the MCO's support for these allocations.
 - c. Request supporting documentation for the elements of any allocation basis utilized by the MCO and ensure it agrees.
- 14) Document the cost allocation worksheet provided by the MCO in response to the request list. Trace the following elements to the support provided for allocations. Request additional support, as needed, if the self-reported amounts are not full account balances.
 - a. Self-Excluded Expenses
 - b. Healthcare Quality Improvement Expenses (HCQI)
 - c. Fraud Reduction and Recovery Expenses
 - d. Non-recurring expenses such as start-up costs
 - e. Care Coordination
 - f. COVID 19 Related Expenses
 - g. Allowable Member Incentives
- 15) Compare administrative and claims adjustment expenses per the quarterly filing for the year ended December 31, 2022 to the prior year and obtain explanations for any fluctuations greater than 10 percent and \$100,000. Determine and document whether the MCO's explanation is consistent with supporting documentation.



- 16) Scan administration expense accounts allocated to the Medicaid line of business for the below types of expenses. Select 15 to 20 accounts from this scan and from Step 14 and request the general ledger and a description of the account contents. If these documents are inconclusive as to the nature of the expense, request invoices for no more than five entries. Confer with the assigned senior manager/partner to select samples and document the reasoning.
- a. Non-allowable expenses as defined either by the MCO contract with DMAS, 45 CFR § 75.420 to 75.475, or by CMS Publication 15. Examples of non-allowable expenses include: lobbying, contributions/donations, income tax, management fees for non-Virginia operations, and management fees for the sole purpose of securing an exclusive arrangement.
 - b. Non-recurring expenses such as start-up costs and expenses reimbursed separately from the MCO rate such as the health insurer fee.
 - c. HCQI Expenses.
 - d. Fraud Reduction and Recovery Expenses.
 - e. Non-recurring expenses such as start-up costs.
 - f. Care Coordination.
 - g. COVID 19 Related Expenses.
 - h. Allowable Member Incentives.
- 17) Agree the summary work paper of related-party transactions from the MCO from Step 7 to the trial balance. Obtain agreements or other supporting documentation for payments to or costs allocated from affiliates or parent companies and determine if exclusivity payments or special contractual arrangements are included. Ensure the regulations within CMS Publication 15-1, Chapter 10 have been applied.
- 18) Agree the summary work paper of delegated vendor transactions from the MCO from Step 8 to the trial balance. For vendors with sub-capitated arrangements and the Pharmacy Benefit Manager (PBM), obtain agreements and ensure that medical and administrative expenses were appropriately separated on the quarterly filing. For the PBM, collect information regarding where all costs (claims payments, ingredient cost, dispensing fees, rebates, sales tax, spread pricing, administrative payment, and other) are included on the trial balance and collect information regarding spread pricing, if applicable.
- 19) Prepare a narrative that summarizes the MCOs' methodology for reporting reinsurance premiums and reinsurance recoveries. Include both reinsurance amounts per the annual statement, as well as the allocation methodology to the Medicaid line of business. Agree amounts to the trial balance or document the trial balance account these amounts are included in.



Appendix B: Results

Source of Information

Our procedures were performed to determine allowable administrative expenses for the purpose of Medicaid rate development. Our procedures were not performed to determine whether such administrative expenses were properly reported for purposes of the Bureau of Insurance of the Commonwealth of Virginia.

We used the quarterly filing required by the Department (quarterly filing), the Annual Statement submitted to the Insurance Department of the Commonwealth of Virginia (Annual Statement), and audited financial statements for HealthKeepers, Inc. for the year ended December 31, 2022.

HealthKeepers, Inc. is owned 92.51% by Anthem Southeast, Inc. and 7.49% by UNICARE National Services, Inc. HealthKeepers, Inc. receives administrative services from Elevance Health, Inc., Elevance Health Companies, Inc., Anthem Insurance Companies, Inc., and WellPoint Information Technology Services, Inc. (referred to collectively as Elevance Health). HealthKeepers, Inc. has administrative expenses from two other related parties, Carelon Services, Inc. (formerly Diversified Business Group), and IngenioRx, Inc., which are both owned by Elevance Health, Inc. Carelon Services, Inc. provides utilization management and program integrity services. IngenioRx, Inc. provides prescription benefit management for HealthKeepers, Inc. In order to perform the agreed upon procedures outlined in Appendix A, we obtained a trial balance for HealthKeepers, Inc., as well as related party support.

HealthKeepers, Inc. has delegated certain functions to vendors. Access2Care, LLC and Southeastrans, Inc. provide non-emergency medical transport services. Public Partnerships LLC (PPL) is the fiscal employer/agent for consumer directed services. Laboratory Corporation of America (LabCorp) provides laboratory services.

Trial Balance Reconciliation

We obtained HealthKeepers, Inc.'s adjusted trial balance as of December 31, 2022, and agreed the account descriptions, account numbers and ending balances for a sample of 20 accounts to the general ledger for the year ended December 31, 2022. No exceptions were noted.

Total administrative expenses including claims adjustment expenses per the HealthKeepers, Inc.'s adjusted trial balance as of December 31, 2022 of \$787,529,432 was reconciled to the total administrative expenses including claims adjustment expenses on the quarterly filing of \$787,529,432. The administrative expenses including claims adjustment expenses per the HealthKeepers, Inc. adjusted trial balance as of December 31, 2022 of \$787,529,432 was reconciled to the total administrative expenses including claims adjustment expense on the Annual Statement of \$787,529,432.

Administrative Expenses

Total claims adjustment expenses and administrative expenses included in the quarterly filing and Annual Statement consist of direct and indirect expense. Direct expenses are those that are unequivocally related to a product, and therefore, are charged directly to that product. Indirect



expenses are recorded at the Elevance Health level, and allocated to the appropriate entities and products using a variable proxy such as membership or headcounts. The total direct and indirect Medicaid expenses submitted on the quarterly filing for Claims Adjustment and General Administrative expenses are \$111,054,184 and \$145,650,677 respectively. The total direct and indirect Medicaid expenses submitted on the Annual Statement for Claims Adjustment and General Administrative expenses are \$111,054,184 and \$145,650,679 respectively. The \$2 difference in General Administrative expenses is due to rounding.

We compared total HealthKeepers, Inc. administrative and claim adjustment expenses reported on the quarterly filing by line item for the current year and prior year and obtained explanations for any line item with a change greater than \$100,000 and 10%. Total Medicaid and FAMIS general administrative expenses, excluding investment expenses, for 2021 were \$254,583,436 compared to 2022 expenses of \$268,633,514. The increase of \$14,050,078, or 5.52%, is within the specified threshold.

We inspected the accounts and expense categories included in HealthKeepers, Inc.'s trial balance. This included HealthKeepers, Inc. specific and Elevance Health allocated expenses. We judgmentally selected expense categories and accounts for further inspection from the direct expense. Based on this inspection, we determined that \$3,175,629 in marketing expense should be excluded from the Underwriting Exhibit at Appendix C. Additionally, HealthKeepers, Inc. identified \$1,035,278 in start-up costs related to Medicaid Enterprise System (MES) implementation and Provider Services Solutions (PRSS) implementation and \$1,127,898 in start-up costs related to Cardinal Care implementation. These expenses have been excluded from the Underwriting Exhibit at Appendix C and will be amortized over a five year period beginning with MES and PRSS implementation. These expenses have been excluded from the Underwriting Exhibit at Appendix C and amortization for a portion of start-up costs identified in previous years has been included through a separate adjustment. However, this expense will be excluded for rate setting.

The Master Administrative Services Agreement effective January 2014 incorporates Elevance Health and HealthKeepers, Inc. as companies providing and companies receiving services. The compensation terms provide for a pass through of costs. A separate agreement with Carelon Services, Inc. was not provided and instead a Memorandum of Understanding effective September 2016 with AIM Specialty Health was referenced. The related expenses are representative of allocated costs. The Pharmacy Benefit Management Services agreement by and between IngenioRx Inc. and CaremarkPCS Health, L.L.C. (CVS Caremark) effective October 2017 incorporates HealthKeepers, Inc. effective October 1, 2019 and allows for a per claim administrative fee. An addendum to this agreement also became effective June 1, 2020. A schedule documenting payments made to Elevance Health, Carelon Services, Inc. and IngenioRx, Inc. was provided to agree to amounts included with HealthKeepers Inc.'s administrative expenses. Payments made to Elevance Health, Carelon Services, Inc., and IngenioRx, Inc. were \$115,104,091, \$62,014,691, and \$13,154,867 respectively.

Schedules documenting allocated costs from Elevance Health, Carelon Services, Inc., and Ingenio Rx, Inc. were provided to agree to amounts included with HealthKeepers, Inc. administrative expenses. Support for allocated costs was received on a sample basis and were found to be allowable.



Access2Care, LLC, Southeastrans, Inc., PPL, and LabCorp expenses are appropriately split between administrative and medical on the trial balance. These vendors provide non-emergency transportation services, administration of the dental benefit, fiscal employer/agent for consumer directed services, and laboratory services.

Healthcare Quality Improvement Expenses (HCQI)

HCQI expenses are accumulated with administrative expenses at the Elevance Health level, and allocated to HealthKeepers, Inc. using a variable proxy. HCQI expenses fall into the following five categories: improve health outcomes, activities to prevent hospital readmissions, improve patient safety and reduce medical errors, wellness and health promotion activities, and health information technology quality improvement. Total HCQI expense allocated to Medicaid in 2022 is \$84,995,130. This amount included \$62,211,894 related to care coordination.

Reinsurance

HealthKeepers, Inc. pays reinsurance premiums to Anthem Health Plans of Virginia, Inc. and EyeMed Insurance Company. Reinsurance recoveries are based on expenses for inpatient hospital services subject to defined limitations. Reinsurance premiums of \$20,678,284 were agreed to the trial balance and they have been included in Total Revenues on the quarterly filing. Reinsurance recoveries of \$18,402,158 were agreed to the trial balance and have been offset against Medical Service Expenditures on the quarterly filing. Both reinsurance premiums and recoveries agree to the Annual Statement.

Total Revenues

Total revenues were agreed to the trial balance. Amounts reported as change in unearned premium reserves and aggregate write-ins were inspected to determine appropriateness for rate setting purposes. The change in unearned premium reserves included reserves related to prior and future periods which were removed for the purposes of this report. There were no aggregate write-ins noted on the quarterly filing.



HEALTHKEEPERS, INC.
APPENDIX C: UNDERWRITING EXHIBIT

Underwriting Exhibit for the Year Ending December 31, 2022						
	Medallion 4.0 Non-Expansion	Medallion 4.0 Expansion	CCC Plus Non-Expansion	CCC Plus Expansion	Total Medicaid	FAMIS
Administrative Expense						
Claims Adjustment Expenses	\$ 28,789,950	\$ 21,620,451	\$ 47,807,865	\$ 12,835,918	\$ 111,054,184	\$ 5,146,444
General Administrative Expenses	\$ 60,152,317	\$ 26,018,181	\$ 47,785,721	\$ 11,694,458	\$ 145,650,677	\$ 6,782,209
Total Administrative Expenses	\$ 88,942,267	\$ 47,638,632	\$ 95,593,586	\$ 24,530,376	\$ 256,704,861	\$ 11,928,653
Less: Self-Reported Excludable Expenses *	\$ (2,670,209)	\$ (1,370,245)	\$ (2,570,011)	\$ (664,432)	\$ (7,274,897)	\$ (235,033)
Adjusted Administrative Expenses	\$ 86,272,058	\$ 46,268,387	\$ 93,023,575	\$ 23,865,944	\$ 249,429,964	\$ 11,693,620
Adjustment 1: Remove 2022 start-up costs.	\$ (1,052,232)	\$ (478,040)	\$ (468,851)	\$ (125,982)	\$ (2,125,105)	\$ (38,071)
Adjustment 2: Remove marketing/advertising expense.	\$ (1,662,259)	\$ (764,864)	\$ (441,358)	\$ (110,978)	\$ (2,979,459)	\$ (196,170)
Adjustment 3: Include amortization related to Medallion 4.0, Medicaid Expansion, and MES.	\$ 559,355	\$ 261,714	\$ 47,804	\$ 92,478	\$ 961,351	\$ -
Adjustment 4: Remove fraud reduction and recovery expenses in excess of fraud recoveries.	\$ (156,808)	\$ (72,139)	\$ (34,038)	\$ (8,996)	\$ (271,981)	\$ (16,247)
Total Adjusted Administrative Expenses	\$ 83,960,114	\$ 45,215,058	\$ 92,127,132	\$ 23,712,466	\$ 245,014,770	\$ 11,443,132
Total Revenues	\$ 989,014,062	\$ 743,902,428	\$ 1,652,437,085	\$ 443,005,958	\$ 3,828,359,533	\$ 83,796,077
Adjustment 5: Remove member incentives from Net Premium Income.	\$ -	\$ 443,325	\$ -	\$ -	\$ 443,325	\$ -
Adjustment 6: Remove unearned premium reserves not relating to the current period	\$ 21,807,184	\$ (55,071,820)	\$ 35,166,491	\$ 9,545,541	\$ 11,447,396	\$ 2,903,269
Total Adjusted Revenues	\$ 1,010,821,246	\$ 689,273,933	\$ 1,687,603,576	\$ 452,551,499	\$ 3,840,250,254	\$ 86,699,346
Percentage of Adjusted Administration Expenses to Total Adjusted Revenues	8.31%	6.56%	5.46%	5.24%	6.38%	13.20%
Separately Identified Expenses included in Adjusted Administrative Expenses						
Healthcare Quality Improvement Expenses (HCQI)	\$ 14,948,906	\$ 7,725,510	\$ 46,390,424	\$ 11,983,975	\$ 81,048,815	\$ 3,946,315
Fraud Reduction and Recovery Expenses	\$ 274,947	\$ 126,489	\$ 331,203	\$ 87,537	\$ 820,176	\$ 28,488
Start Up / Other Non Recurring Expenses	\$ 378,910	\$ 190,145	\$ 338,726	\$ 89,426	\$ 997,207	\$ 38,071
Care Coordination expenses as defined within the MCO contract	\$ 5,296,144	\$ 2,737,017	\$ 41,945,020	\$ 10,835,600	\$ 60,813,781	\$ 1,398,113
COVID 19 Related Expenses: Non Recurring	\$ 555	\$ 247	\$ 122	\$ 30	\$ 954	\$ 59



HEALTHKEEPERS, INC.
APPENDIX C: UNDERWRITING EXHIBIT

Underwriting Exhibit for the Year Ending December 31, 2022						
	Medallion 4.0 Non-Expansion	Medallion 4.0 Expansion	CCC Plus Non-Expansion	CCC Plus Expansion	Total Medicaid	FAMIS
COVID 19 Related Expenses: Long Term program changes as a result of the pandemic	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Allowable Member Incentives	\$ 443,325	\$ -	\$ -	\$ -	\$ 443,325	\$ -

* Medicaid expenses excluded by the MCO include Lobbying Expenses (\$304,714), Contributions (\$24,208), and State and Federal Income Taxes (\$6,100,095), Contractual Fines & Penalties (45,000) and Claims Interest (1,035,913)



Appendix D: Schedule of Adjustments and Comments

During our procedures we noted certain matters involving costs, that in our determination did not meet the definitions of allowable administrative expenses and other operational matters that are presented for your consideration.

Adjustment #1 –Remove 2022 start-up costs.

HealthKeepers, Inc. identified \$1,035,278 in start-up expenses related to Medicaid Enterprise Systems (MES) and Provider Services Solution (PRSS) and \$1,127,898 in start-up expenses related to Cardinal Care implementation. These expenses are being amortized over five years based on implementation date of the program. The 2022 expenses were removed in total. See Adjustment #3 for the related adjustment to add back the amortization costs for programs that have begun prior to the end of the period. (CMS Pub. 15-1: §2132 – Start-Up Costs)

Proposed Adjustment					
Medallion 4.0 Non-Expansion	Medallion 4.0 Expansion	CCC Plus Non-Expansion	CCC Plus Expansion	Total Medicaid	FAMIS
\$(1,052,232)	\$(478,040)	\$(468,851)	\$(125,982)	\$(2,125,105)	\$(38,071)

Adjustment #2 –Remove marketing/advertising expense.

During inspection of the Quarterly Filing reports, we found expenses coded to the marketing category. We determined this cost to be non-allowable and an adjustment was made to remove this expense. (45 CFR § 75.421)

Proposed Adjustment					
Medallion 4.0 Non-Expansion	Medallion 4.0 Expansion	CCC Plus Non-Expansion	CCC Plus Expansion	Total Medicaid	FAMIS
\$(1,662,259)	\$(764,864)	\$(441,358)	\$(110,978)	\$(2,979,459)	\$(196,170)

Adjustment #3 – Include Medallion 4.0 and Expansion amortization.

HealthKeepers, Inc. has identified start-up costs related to various programs in the current year and in previous years. These expenses were removed each year to be amortized over a period of five years beginning with the start date of each program. Expenses included in this adjustment are \$1,560,000



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related to Medallion 4.0 implementation, \$1,175,000 related to Medicaid Expansion, and \$2,762,341 related to MES Implementation. (CMS Pub. 15-1: §2132 – Start-Up Costs)

Proposed Adjustment					
Medallion 4.0 Non-Expansion	Medallion 4.0 Expansion	CCC Plus Non-Expansion	CCC Plus Expansion	Total Medicaid	FAMIS
\$559,355	\$261,714	\$47,804	\$92,478	\$961,351	\$0

Adjustment #4 – Remove fraud reduction and recovery expenses in excess of fraud recoveries.

HealthKeepers, Inc. identified expenses related to fraud reduction and recovery totaling \$1,136,892. HealthKeepers, Inc. identified fraud recoveries totaling \$848,664. As fraud reduction and recovery expenses are limited to the amount of claims payments recovered through the related efforts, the excess expenses of \$288,228 have been removed. (45 CFR § 158.140(b)(2)(iv))

Proposed Adjustment					
Medallion 4.0 Non-Expansion	Medallion 4.0 Expansion	CCC Plus Non-Expansion	CCC Plus Expansion	Total Medicaid	FAMIS
(\$156,808)	(\$72,139)	(\$34,038)	(\$8,996)	(\$271,981)	(\$16,247)

Adjustment #5 – Remove member incentives from Net Premium Income.

HealthKeepers, Inc. identified \$443,325 in allowable member incentives. These incentives are located in account 403510, Other Premium Refunds, which was included with Net Premium Income on both the Annual Statement and quarterly filing. As the contents of the account include expenses related to member incentives for wellness checkups and gift cards this account has been removed from Total Adjusted Revenues. (45 CFR § 158.130)

Proposed Adjustment					
Medallion 4.0 Non-Expansion	Medallion 4.0 Expansion	CCC Plus Non-Expansion	CCC Plus Expansion	Total Medicaid	FAMIS
\$0	\$443,325	\$0	\$0	\$443,325	\$0

Adjustment #6 – Remove unearned premium reserves not relating to the current period.

HealthKeepers, Inc. included unearned premium reserves related to periods prior to January 1, 2022 and subsequent to December 31, 2022 based on their financial reporting procedures. An adjustment of



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\$14,350,665 was made to remove all unearned premium reserves not related to the period under review, for the purposes of administrative reporting.

Proposed Adjustment					
Medallion 4.0 Non-Expansion	Medallion 4.0 Expansion	CCC Plus Non-Expansion	CCC Plus Expansion	Total Medicaid	FAMIS
\$21,807,184	\$(55,071,820)	\$35,166,491	\$9,545,541	\$11,447,396	\$2,903,269