



Molina Healthcare of  
Virginia, LLC

CardinalCare  
Virginia Medicaid  
Managed Care Programs

## Adjusted Administrative Expenses

*(With Independent Accountant's Report Thereon)*

For the State Fiscal Year Ended June 30, 2025



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# Independent Accountant's Report

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Commonwealth of Virginia  
Department of Medical Assistance Services  
Richmond, Virginia

We have performed the procedures enumerated in Administrative Expenses Agreed-Upon Procedures on the Adjusted Administrative Expenses of Molina Healthcare of Virginia, LLC (health plan) for the State Fiscal Year ended June 30, 2025. We applied these procedures to assist you in inspecting administrative expenses for Medicaid rate development. The health plan's management is responsible for presenting the Adjusted Administrative Expenses used by the Virginia Department of Medical Assistance Services (Department) for the purposes of Medicaid rate development.

The Department has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of inspecting 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 the Administrative Expenses Agreed-Upon Procedures and our findings are contained in the Adjusted Administrative Expenses and the Schedule of Adjustments. As agreed, materiality limits were applied as specified within the Administrative Expenses Agreed-Upon Procedures.

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 respectively, on the health plan'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 health plan 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, Mercer, and the health plan and is not intended to be, and should not be, used by anyone other than these specified parties.

Myers and Stauffer LC  
Glen Allen, Virginia  
December 17, 2025

# Appendix A: Administrative Expense Agreed-Upon Procedures

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## **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 to the annual statement and the quarterly filing.
- 11) Obtain the adjusted trial balance as of June 30, 2025. 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 period ended June 30, 2025.
- 12) Obtain the year-end adjusting journal entries recommended by the independent accountant. 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 Cardinal Care Acute, Cardinal Care LTSS, 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. Allowable Member Incentives
- 15) Compare administrative and claims adjustment expenses per the quarterly filing for the state fiscal year ended June 30, 2025 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 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.
  - c. HCQI Expenses
  - d. Fraud Reduction and Recovery Expenses
  - e. Non-recurring expenses such as start-up costs
  - f. Care Coordination
  - g. 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: Adjusted Administrative Expenses

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### 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 Molina Healthcare of Virginia, LLC (Molina of Virginia). The quarterly filing is for the State Fiscal Year ended June 30, 2025 and the Annual Statement and audited financial statements are for the calendar year ended December 31, 2024.

Molina of Virginia is a wholly owned subsidiary of Molina Healthcare, Inc. (Molina). Molina of Virginia also receives administrative services from Molina. In order to perform the agreed upon procedures outlined in Appendix A, we obtained a schedule of allocated expenses for Molina as well as the management agreement.

Molina of Virginia has delegated certain functions to vendors. CaremarkPCS Health, L.L.C. (Caremark) provides pharmacy benefit management services. VSP Vision Care, Inc. (VSP) provides administration of the vision benefit. ACES\$ Financial Management Services (ACES\$) and Consumer Direct Care Network (CDCN) are the fiscal employers/agents for consumer directed services. Access2Care provides administration of the non-emergent transportation benefit.

### Trial Balance Reconciliation

We obtained Molina of Virginia's adjusted trial balance as of June 30, 2025, and agreed the account descriptions, account numbers and ending balances for a sample of 20 accounts to the general ledger for the year ended June 30, 2025. No exceptions were noted.

Total administrative expenses including claims adjustment expenses per the Molina of Virginia adjusted trial balance as of June 30, 2025 of \$117,334,156 were reconciled to the total administrative expenses, including claims adjustment expenses on the quarterly filing of \$120,498,495. The difference of \$3,164,339 is due to a reclassification in the amount of \$3,073,573 of the administrative portion of Access2Care non-emergent transportation expenses from medical to administrative expenses, a GAAP adjustment of (\$6,734), and the inclusion of sanctions and penalties in the amount of \$97,500.

### Administrative Expenses

Total claims adjustment expenses and administrative expenses included in the quarterly filing 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 allocated to the appropriate

product. The total direct and indirect Medicaid expenses submitted on the quarterly filing for Claims Adjustment and General Administrative expenses are \$52,948,055 and \$61,212,422 respectively.

We compared total Molina of Virginia 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 general administrative expenses, excluding investment expenses, for State Fiscal Year ended June 30, 2024 were \$116,795,574 compared to State Fiscal Year ended June 30, 2025 expenses of \$114,160,477. The decrease of \$2,635,097, or 2.26%, is within the specified threshold.

We inspected the accounts and expense categories included in Molina of Virginia's trial balance. This included Molina of Virginia's direct expenses and Molina allocated expenses. We judgmentally selected expense categories and accounts for further inspection. Based on this inspection, we determined that there were no additional excluded expenses. We found that the marketing expenses self-excluded by the health plan did not agree to the underlying support and an adjustment was needed to correct this error. Molina identified \$4,182,005 in non-recurring costs related to severance wages and retention bonuses. We determined these costs should be excluded from the Underwriting Exhibit at Appendix C. Amortization related to start-up costs identified in previous years has been included through an adjustment. However, this expense will be excluded for rate setting.

Molina provides Molina of Virginia with administrative services. The Services Agreement by and between Molina of Virginia and Molina effective January 1, 2021 allows for a monthly fee equal to an amount reflecting the value of the administrative services provided. Payments made to Molina were \$57,060,470.

A schedule documenting allocated costs from Molina was provided to agree to amounts included with Molina of Virginia administrative expenses. Support for allocated costs was received on a sample basis and were found to be allowable.

Caremark, VSP, ACES\$, and CDCN expenses are appropriately split between administrative and medical on the trial balance. These vendors provide administration of the pharmacy benefit, administration of the vision benefit, and fiscal employer/agent services for consumer directed services, respectively. Access2Care provides administration of the non-emergent transportation benefit. The expenses are recorded to a medical account, and the administrative component, totaling \$3,046,211, has been appropriately reclassified to administrative for the purposes of the quarterly filing.

#### **Healthcare Quality Improvement Expenses (HCQI)**

HCQI expenses are calculated by Molina through review and analysis of the departments containing HCQI expenses, including both Molina of Virginia's direct expenses and Molina allocated expenses. Departments containing HCQI expense are analyzed to determine the amount of cost associated with HCQI and the percentage of that associated with each of the five categories (Improve Health Outcomes, Wellness and Health Promotion, Prevent Hospital Readmission, and Improve Patient Safety/Reduce Medical Errors and Health Information Technology). This expense is allocated to Medicaid using the same allocation basis for other shared services costs. Total HCQI expense allocated to Medicaid for 2025 is \$34,181,081. This amount included \$13,329,773 related to care coordination.



**Reinsurance**

Molina does not have a reinsurance policy and therefore there is no related expense or recoveries.

**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 health plan appropriately reported the change in unearned premium reserves as relating to prior and future periods, and as such, they have been excluded for the purposes of this report. Aggregate write-ins included directed payments and vaccine administration revenues, which were removed for the purposes of this report.

## MOLINA HEALTHCARE OF VIRGINIA, LLC

### APPENDIX C: ADJUSTED ADMINISTRATIVE EXPENSES

Line #	Line Description	Cardinal Care Acute FAMIS & FAMIS MOMS	Cardinal Care Acute Non Expansion	Cardinal Care Acute Expansion	Cardinal Care LTSS Non Expansion	Cardinal Care LTSS Expansion	Total Medicaid
<b>1</b>	<b>Administrative Expense</b>	-	-	-	-	-	-
1.1	Claims Adjustment Expenses	\$ 973,287	\$ 9,006,428	\$ 6,716,197	\$ 24,440,268	\$ 11,811,876	\$ 52,948,055
1.2	General Administrative Expenses	\$ 2,306,969	\$ 7,847,012	\$ 15,827,960	\$ 24,169,089	\$ 11,061,393	\$ 61,212,422
<b>1.3</b>	<b>Total Administrative Expenses</b>	<b>\$ 3,280,256</b>	<b>\$ 16,853,439</b>	<b>\$ 22,544,157</b>	<b>\$ 48,609,356</b>	<b>\$ 22,873,269</b>	<b>\$ 114,160,477</b>
1.4	Less: Self-Reported Excludable Expenses *	\$ (155,367)	\$ (725,787)	\$ (414,312)	\$ (236,165)	\$ 111,413	\$ (1,420,218)
<b>1.5</b>	<b>Adjusted Administrative Expenses</b>	<b>\$ 3,124,889</b>	<b>\$ 16,127,653</b>	<b>\$ 22,129,844</b>	<b>\$ 48,373,191</b>	<b>\$ 22,984,681</b>	<b>\$ 112,740,259</b>
1.6	Adjustments to Administrative Expenses	\$ (104,982)	\$ (159,289)	\$ (727,097)	\$ (2,006,084)	\$ (909,238)	\$ (3,906,691)
<b>1.7</b>	<b>Total Adjusted Administrative Expenses</b>	<b>\$ 3,019,907</b>	<b>\$ 15,968,363</b>	<b>\$ 21,402,747</b>	<b>\$ 46,367,107</b>	<b>\$ 22,075,444</b>	<b>\$ 108,833,568</b>
<b>2</b>	<b>Net Premium Income</b>	-	-	-	-	-	-
2.1	Net Premium Income	\$ 36,085,610	\$ 278,834,505	\$ 280,099,917	\$ 527,442,631	\$ 272,550,724	\$ 1,395,013,386
2.2	Adjustments to Net Premium Income	\$ -	\$ (85,590,111)	\$ (80,700,600)	\$ (68,106,540)	\$ (82,937,132)	\$ (317,334,382)
<b>2.3</b>	<b>Total Adjusted Revenues</b>	<b>\$ 36,085,610</b>	<b>\$ 193,244,394</b>	<b>\$ 199,399,317</b>	<b>\$ 459,336,090</b>	<b>\$ 189,613,592</b>	<b>\$ 1,077,679,004</b>
2.4	Percentage of Adjusted Administration Expenses to Net Premium Income	8.37%	8.26%	10.73%	10.09%	11.64%	10.10%
<b>3</b>	<b>Separately Identified Expenses included in Adjusted Administrative Expenses</b>	-	-	-	-	-	-
3.1	Healthcare Quality Improvement Expenses (HCQI)	\$ 812,212	\$ 1,355,656	\$ 5,723,205	\$ 17,946,003	\$ 8,344,005	\$ 34,181,081
3.2	Fraud Reduction and Recovery Expenses	\$ 35,444	\$ 185,753	\$ 247,989	\$ 440,554	\$ 206,586	\$ 1,116,326
3.3	Start Up / Other Non Recurring Expenses	\$ 112,198	\$ 188,884	\$ 794,561	\$ 2,107,546	\$ 978,816	\$ 4,182,005
3.4	Care Coordination expenses as defined within the MCO contract	\$ 72,016	\$ 221,204	\$ 815,496	\$ 8,367,415	\$ 3,853,641	\$ 13,329,773
3.5	Allowable Member Incentives	\$ (3,392)	\$ (5,710)	\$ (24,019)	\$ (10,936)	\$ (5,079)	\$ (49,135)

\* Medicaid expenses excluded by the health plan include lobbying expenses (\$7,639), contributions (\$4,964), State and Federal income taxes (\$391,935), claims interest (\$491,829), fines and penalties (\$97,339), and marketing and advertising (\$426,512).

## Appendix D: Schedule of Adjustments

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 – To adjust HCQI included in separately identified expenses to agree to supporting documentation submitted by the health plan.**

Molina of Virginia had originally identified \$34,228,836 of Healthcare Quality Improvement costs. However, a formula error was identified that resulted in an overstatement of \$47,755.

Table 1. Proposed Adjustment #1 to Line 3.1 – Healthcare Quality Improvement Expenses (HCQI)

Cardinal Care FAMIS	Cardinal Care Acute Non-Expansion	Cardinal Care Acute Expansion	Cardinal Care LTSS Non-Expansion	Cardinal Care LTSS Expansion	Total Medicaid
(\$1,617)	(\$4,050)	(\$14,710)	(\$18,218)	(\$9,160)	(\$47,755)

### **Adjustment #2 – To include amortized start-up costs related to Expansion, Electronic Visit Verification (EVV), Fiscal Employer Agent transition, the MES conversion, and the behavioral health redesign.**

Molina of Virginia has identified start-up costs related to various programs 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 \$323,554 related to Medicaid Expansion, which began January 2019, \$54,575 related to EVV, which began September 2020, \$33,638 related to the Fiscal Employer Agent (FEA) transition, which began January 2020, \$15,012 related to the behavioral health redesign, which began July 2021, \$613,065 related to MES, which began April 2022, and \$104,999 related to PRSS, which began April 2022. (CMS Pub. 15-1: §2132 – Start-Up Costs).

Table 2. Proposed Adjustment #2 to Line 1.3 – Total Administrative Expenses

Cardinal Care FAMIS	Cardinal Care Acute Non-Expansion	Cardinal Care Acute Expansion	Cardinal Care LTSS Non-Expansion	Cardinal Care LTSS Expansion	Total Medicaid
\$4,376	\$22,481	\$41,624	\$69,461	\$53,488	\$191,430

**Adjustment #3 – To adjust self-excluded marketing expense to agree to supporting documentation submitted by the health plan.**

Molina of Virginia had originally identified \$426,512 of self-excluded unallowable marketing costs. However, a formula error was identified that resulted in an overstatement to the self-exclusion of \$83,885.

Table 3. Proposed Adjustment #3 to Line 1.3 – Total Administrative Expenses

Cardinal Care FAMIS	Cardinal Care Acute Non-Expansion	Cardinal Care Acute Expansion	Cardinal Care LTSS Non-Expansion	Cardinal Care LTSS Expansion	Total Medicaid
\$2,840	\$7,114	\$25,840	\$32,001	\$16,090	\$83,885

**Adjustment #4 – To adjust care coordination included in separately identified expenses to agree to supporting documentation submitted by the health plan.**

Molina of Virginia had originally identified \$9,825,907 of Care Coordination expenses. However, a formula error was identified that resulted in an understatement of \$3,503,867.

Table 4. Proposed Adjustment #4 to Line 3.4 – Care Coordination expenses as defined within the MCO contract

Cardinal Care FAMIS	Cardinal Care Acute Non-Expansion	Cardinal Care Acute Expansion	Cardinal Care LTSS Non-Expansion	Cardinal Care LTSS Expansion	Total Medicaid
\$0	\$0	\$0	\$0	\$3,503,867	\$3,503,867

**Adjustment #5 – To remove directed payments included in aggregate write-ins.**

Molina of Virginia included directed payments in aggregate write-ins. An adjustment of (\$316,869,868) was made to remove directed payments from total revenue.

Table 5. Proposed Adjustment #5 to Line 2.1 – Net Premium Income

Cardinal Care FAMIS	Cardinal Care Acute Non-Expansion	Cardinal Care Acute Expansion	Cardinal Care LTSS Non-Expansion	Cardinal Care LTSS Expansion	Total Medicaid
\$0	(\$85,590,111)	(\$80,700,600)	(\$67,642,025)	(\$82,937,132)	(\$316,869,868)

**Adjustment #6 – To remove COVID vaccine revenue included in aggregate write-ins.**

Molina of Virginia included COVID vaccine revenue in aggregate write-ins. An adjustment of (\$464,515) was made to remove these revenues from total revenue.

Table 6. Proposed Adjustment #6 to Line 2.1 – Net Premium Income

Cardinal Care FAMIS	Cardinal Care Acute Non- Expansion	Cardinal Care Acute Expansion	Cardinal Care LTSS Non- Expansion	Cardinal Care LTSS Expansion	Total Medicaid
\$0	\$0	\$0	(\$464,515)	\$0	(\$464,515)

**Adjustment #7 – To remove non-recurring costs of severance wages and retention bonuses.**

Molina of Virginia identified non-recurring costs related to severance wages and retention bonuses. We determined this cost to be non-allowable and an adjustment was made to remove this expense. (45 CFR § 75.441)

Table 7. Proposed Adjustment #7 to Line 1.3 – Total Administrative Expenses

Cardinal Care FAMIS	Cardinal Care Acute Non- Expansion	Cardinal Care Acute Expansion	Cardinal Care LTSS Non- Expansion	Cardinal Care LTSS Expansion	Total Medicaid
(\$112,198)	(\$188,884)	(\$794,561)	(\$2,107,546)	(\$978,816)	(\$4,182,005)