

OCTOBER 1, 2020 THROUGH SEPTEMBER 30, 2022

**COMPARISON OF GEORGIA CARE
MANAGEMENT ORGANIZATION
ENCOUNTER DATA TO CASH
DISBURSEMENTS FOR
WELLCARE OF GEORGIA**



NOVEMBER 22, 2022





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The Department of Community Health (DCH) engaged Myers and Stauffer LC to analyze Georgia Families encounter data that has been submitted by the care management organizations (CMO) to Georgia's fiscal agent contractor (FAC), Gainwell Technologies (formerly DXC Technology), and complete a comparison of the encounters to cash disbursement journals (CDJ) provided by each CMO. For purposes of this analysis, "encounter data" are claims that have been paid by CMOs or delegated vendors (e.g., dental, vision, and pharmacy) to health care providers that have rendered health care services to members enrolled with the CMO.

Myers and Stauffer LC receives encounter data on a weekly basis from the FAC in a standardized data extract. This data extract contains paid and denied CMO institutional, medical (including mental health services, where appropriate), dental, and pharmacy encounters that were submitted by the CMO to the FAC and were subsequently loaded into the Medicaid Management Information System (MMIS).

Myers and Stauffer LC analyzes header reported information of each paid encounter in the MMIS to capture the amount paid on the entire claim. In certain instances, we identify potential duplicate and calculated void encounters and conclude that some of these potential duplicates appear to be partial payments, some are actual duplicate submissions, and some are replacement encounters without a matching void when the encounter data is compared to the CDJ submissions.

Once the potential duplicate and calculated void encounters have been identified, we adjust the encounter totals to reflect the actual payment made (i.e. removing the duplicate payment amounts from our analysis). The net encounter total is then used for the reconciliation analysis and compared to the CMO submitted CDJs based on common fields, such as CMO identification number (ID), CMO paid date, and specific delegated vendor criteria.

Our work was performed in accordance with American Institute of Certified Public Accountants (AICPA) professional standards for consulting engagements. We were not engaged to, nor did we perform, an audit, examination, or review services; accordingly, we express no opinion or conclusion related to the procedures performed or the information and documentation we reviewed. In addition, our engagement was not specifically designed for, and should not be relied on, to disclose errors, fraud, or other illegal acts that may exist.

The results of our engagement and this report are intended only for the internal use of the Georgia Department of Community Health (DCH), and should not be used for any other purpose.



WellCare of Georgia Encounter and CDJ Comparison



SUMMARY

DCH requested that, for this study, we review the CMO's entire plan, each delegated vendor, and fee-for-service (non-vendor) paid encounters to determine if the paid encounters meet the state contract minimum completeness requirement of **99 percent** when compared to the CDJ files that are submitted by the CMO. The encounters and CDJ files utilized in this study met the following criteria:

- Encounters were paid within the reporting period of October 1, 2020 through September 30, 2022;
- CDJ transactions had payment dates within the reporting period of October 1, 2020 through September 30, 2022;
- Encounters were received and accepted by the FAC and transmitted to Myers and Stauffer LC through November 7, 2022.

Table A — WellCare Cumulative Completion Totals and Percentages

Description	Entire Plan	Fee-for-Service (Non-Vendor)	Delegated Vendor					
			CVS Health (Pharmacy Benefits)	Envolv Dental (Dental Services)	Envolv Vision (Vision Services)	TNGA (Therapy Services)	Avesis Dental (Dental Services)	Avesis Vision (Vision Services)
Encounter Total (FAC reported)	\$692,731,887	\$511,117,016	\$125,353,550	\$25,480,435	\$1,595,195	\$7,778,498	\$19,609,219	\$1,797,975
<i>Total Encounter Adjustments (\$)</i>	(\$11,163)	(\$9,307)	\$0	(\$1,855)	\$0	\$0	\$0	\$0
<i>Total Encounter Adjustments (%)</i>	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Net Encounter Total	\$692,720,724	\$511,107,708	\$125,353,550	\$25,478,579	\$1,595,195	\$7,778,498	\$19,609,219	\$1,797,975
CDJ Total	\$704,287,707	\$521,356,233	\$126,478,514	\$25,670,410	\$1,612,047	\$7,808,546	\$19,553,160	\$1,808,797
<i>Variance</i>	(\$11,566,983)	(\$10,248,525)	(\$1,124,964)	(\$191,830)	(\$16,852)	(\$30,048)	\$56,058	(\$10,822)
Completion (%)	98.35%	98.03%	99.11%	99.25%	98.95%	99.61%	100.28%	99.40%
100% Limited[^] Completion (%)	98.34%						100.00%	
Contract Minimum Completeness Requirement (%)	99.00%							
Non-Compliant (%)	-0.66%	-0.97%			-0.05%			

[^] - Since the Avesis Dental cumulative completion percentage exceeds 100 percent, we have decreased the Entire Plan encounter totals by the total variance in comparison to the CDJ to avoid overstating the Entire Plan results. Please see data analysis assumption number 11 on page 19 for further explanation.



**ENCOUNTER DATA
ANALYSIS**

For the this study, Myers and Stauffer analyzes the encounter data that is submitted by the CMOs to the FAC’s subcontracted data warehouse vendor, Gainwell Technologies, and loaded into the FAC MMIS. Encounters submitted by any CMO that were rejected by the FAC for errors in submission or other reasons are not transmitted to Myers and Stauffer.

Furthermore, Myers and Stauffer analyzes the encounter data from the FAC MMIS and makes the following adjustments. Table B below outlines the impact of applying these encounter analysis adjustments to the encounter paid amounts, when compared to the raw data received.

1. The payment amounts associated with denied encounters are identified as zero dollars in the encounter reconciliation analysis since they bear no impact on cash disbursements.
2. We identified potential duplicate encounters using our encounter review logic. Based on a comparison to the CDJ files, we noted some of these potential duplicates appear to be partial payments, some are actual duplicate submissions, and some are replacement encounters without a matching void. At the direction of DCH, we have attempted to adjust our totals to reflect the actual payment made and have removed duplicate payment amounts from our analysis. Lists of these potential duplicates, noted in previous reports, were provided to WellCare for examination. We have reviewed WellCare’s disputed duplicate response files submitted to us prior to October 1, 2022. The accepted responses have been incorporated into the analysis for this report. Responses requiring further explanation have not been added to this report and will be resubmitted to the CMO.

Table B — Myers and Stauffer LC's Adjustments to WellCare Encounters			
Description	Encounter Count	Paid Amount	Paid Amount (% of Total*)
Total Encounter Amount (FAC Reported)	6,616,769	\$692,731,887	100.00%
<i>Adjustment Type</i>			
<i>Denied</i>	<i>(619,838)</i>	<i>(\$209)</i>	<i>0.00%</i>
<i>Calculated Void</i>	<i>(14)</i>	<i>(\$976)</i>	<i>0.00%</i>
<i>Duplicate</i>	<i>(48)</i>	<i>(\$9,978)</i>	<i>0.00%</i>
<i>Total Adjustments Made</i>	<i>(619,900)</i>	<i>(\$11,163)</i>	<i>0.00%</i>
Net Encounter Amounts	5,996,869	\$692,720,724	100.00%

* Percentage ratios are rounded down for each adjustment type and may not add up to the total percentage of adjustments made for this reporting period. Please see data analysis assumption number 8 on page 19 for further explanation.



During this analysis, Myers and Stauffer identified potential data issues that may impact the completion percentages for specific delegated vendors and/or fee-for-service (non-vendor). **Section A** details issues related to non-compliant cumulative completion percentages, while **Section B** notes outstanding data issues that WellCare may need to work to identify and resolve.

Please reference Tables 1 through 8 starting on page 8 for WellCare's entire plan, delegated vendor, and fee-for-service (non-vendor) reconciliation period tables for detailed reconciliation totals, completion percentages, and encounter analysis adjustments.

SECTION A – Data issues and notes that may impact the non-compliant completion percentages:

1. **Fee-for-Service (non-vendor) (Table 2):** We noted that the cumulative completion percentages, and most months, appear to be out of compliance with the 99 percent completion requirement. The low completion percentages appear to be due to potentially missing encounter sequences and/or missing encounter records when compared to the CDJ transactions. The highly inflated monthly completion percentages (i.e., February 2022; 186.39 percent) appear to be due to missing encounters and/or CDJ's (both positive and negative transactions), as well as misallocated encounter adjustments. Specifically on July 6, 2022, there appears to be a large number of missing CDJ voids when compared to the encounters. It is also noted that these CDJ voids seem to be attributed to a few particular providers. The impact on the monthly completeness appears to affect recent months considerably more due to WellCare's run-out period.
 - **We recommend WellCare continue to work to identify and submit any missing Fee-for-Service encounter records.**
2. **Envolve Vision (Table 5):** The Envolve Vision cumulative completion percentage is slightly below 99 percent, mostly due to missing claim sequences (both positive and negative transactions) in the encounter data when compared to the CDJ transactions. The large percentage variances are due to small amount variances during the run out period after May 2021.
 - **We recommend WellCare work with Envolve Vision to submit any missing encounter or CDJ records.**
3. **Avesis Dental (Table 7):** The Avesis Dental cumulative completion percentage is slightly above 100 percent due to potentially missing CDJ transactions, as well as missing or misallocated encounter adjustments/voids.
 - Additionally, we identified instances of potentially missing encounters, which appear to be causing the low completion percentages beginning in February 2021. In particular, missing encounters with paid dates of February 3, 2021; October 20, 2021; and December 28, 2021 may be understating their respective months' completion percentages.
 - **We recommend WellCare work with Avesis Dental to identify and submit any missing encounter or CDJ records.**

SECTION B – Data issues and notes that currently may not impact compliance:

4. **CVS Health (Table 3):** The overall CVS Pharmacy completion percentage is in compliance; however, potentially missing encounter sequences, including voids, appear to be causing the monthly completion percentages to fluctuate from below 99 percent to above 100 percent. The large variances in the completion percentages are due to small variances during the run-out period after May 2021.
 - **We recommend WellCare work with CVS Health to identify and submit any missing encounter records or voids.**



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5. **Engolve Dental (Table 4):** Instances of potentially missing encounters and unmatched paid amounts between encounters and CDJ files were identified, potentially causing the understated monthly completion percentages since June 2021. Additionally, potentially missing CDJ voids appear to be severely affecting later months.
 - We noted specific paid dates with a larger number of missing encounters and/or unmatched payment amounts for the low percentage months (e.g., October 15, 2021; November 19, 2021; and March 14, 2022). While CDJ files have been received for recent months, no encounters appear to have been submitted for paid dates subsequent to March 2022.
 - **We recommend WellCare work with Engolve Dental to identify and submit any missing encounter or CDJ records.**

6. **Avesis Vision (Table 8):** The monthly completion percentages are high for four months (e.g. April 2021) and low for six months (e.g. June 2021). Missing encounter voids and missing CDJs appear to be causing the high monthly completion percentages. Meanwhile, the low completion percentages appear to be due to missing encounters when compared to the CDJs. The large variances in completion percentages are primarily driven by small dollar amounts causing significant percentage swings.
 - **We recommend WellCare continue to work with Avesis Vision to identify and submit any missing encounter records.**

WellCare of Georgia Encounter and CDJ Comparison



**WELLCARE ENTIRE PLAN
MONTHLY TABLE**

Table 1 — WellCare (Entire Plan)							
Paid Month	Monthly Encounter Total (FAC Reported)	Monthly Encounter Total (Adjustments)	Percentage of Encounters Adjusted	Monthly Encounter Net Total	CDJ Monthly Reported Total	Monthly Variance	Monthly Completion Percentage
October 2020	\$92,469,205	(\$78)	0.00%	\$92,469,128	\$94,470,513	(\$2,001,386)	97.88%
November 2020	\$91,196,845	\$0	0.00%	\$91,196,845	\$92,210,197	(\$1,013,352)	98.90%
December 2020	\$87,675,048	\$0	0.00%	\$87,675,048	\$89,856,104	(\$2,181,056)	97.57%
January 2021	\$86,062,541	(\$111)	0.00%	\$86,062,431	\$86,642,498	(\$580,068)	99.33%
February 2021	\$84,675,754	\$0	0.00%	\$84,675,754	\$86,671,269	(\$1,995,515)	97.69%
March 2021	\$91,131,904	(\$1,392)	0.00%	\$91,130,512	\$91,956,309	(\$825,797)	99.10%
April 2021	\$88,421,544	(\$455)	0.00%	\$88,421,089	\$88,714,153	(\$293,064)	99.66%
May 2021	\$48,548,393	(\$788)	0.00%	\$48,547,605	\$49,739,006	(\$1,191,401)	97.60%
June 2021	\$9,671,312	(\$9)	0.00%	\$9,671,304	\$10,796,404	(\$1,125,100)	89.57%
July 2021	\$5,436,125	(\$210)	0.00%	\$5,435,915	\$5,613,257	(\$177,342)	96.84%
August 2021	\$3,767,133	\$0	0.00%	\$3,767,133	\$3,860,006	(\$92,872)	97.59%
September 2021	\$2,489,562	\$0	0.00%	\$2,489,562	\$2,401,602	\$87,960	103.66%
October 2021	\$383,091	\$0	0.00%	\$383,091	\$477,035	(\$93,944)	80.30%
November 2021	(\$425,940)	\$0	0.00%	(\$425,940)	(\$603,830)	\$177,890	70.53%
December 2021	\$1,319,818	\$0	0.00%	\$1,319,818	\$1,357,091	(\$37,273)	97.25%
January 2022	\$886,844	\$0	0.00%	\$886,844	\$1,046,299	(\$159,454)	84.76%
February 2022	\$684,560	\$0	0.00%	\$684,560	\$369,427	\$315,132	185.30%
March 2022	(\$232,762)	\$0	0.00%	(\$232,762)	(\$170,369)	(\$62,393)	136.62%
April 2022	(\$504,459)	\$0	0.00%	(\$504,459)	(\$327,523)	(\$176,935)	154.02%
May 2022	\$177,090	\$0	0.00%	\$177,090	\$218,961	(\$41,872)	80.87%
June 2022	(\$55,122)	\$0	0.00%	(\$55,122)	(\$173,231)	\$118,109	31.81%
July 2022	(\$467,527)	(\$6,209)	1.32%	(\$473,736)	(\$47,389)	(\$426,347)	999.66%
August 2022	(\$298,063)	(\$304)	0.10%	(\$298,366)	(\$433,730)	\$135,363	68.79%
September 2022	(\$281,010)	(\$1,609)	0.57%	(\$282,619)	(\$356,354)	\$73,735	79.30%
Cumulative Totals	\$692,731,887	(\$11,163)	0.00%	\$692,720,724	\$704,287,707	(\$11,566,983)	98.35%
100% Limited^ Cumulative Totals				\$692,664,666	\$704,287,707	(\$11,623,041)	98.34%
						State Contract Minimum Completeness Percentage Requirement	99.00%
						Non-Compliant	-0.66%

^ - Since the Avesis Dental cumulative completion percentage exceeds 100 percent, we have decreased the Entire Plan encounter totals by the total variance in comparison to the CDJ to avoid overstating the Entire Plan results. Please see data analysis assumption number 11 on page 19 for further explanation.



WELLCARE SUMMARY REPORTING CHARTS

Chart 1. Monthly CDJ totals and encounter submissions for WellCare’s entire plan

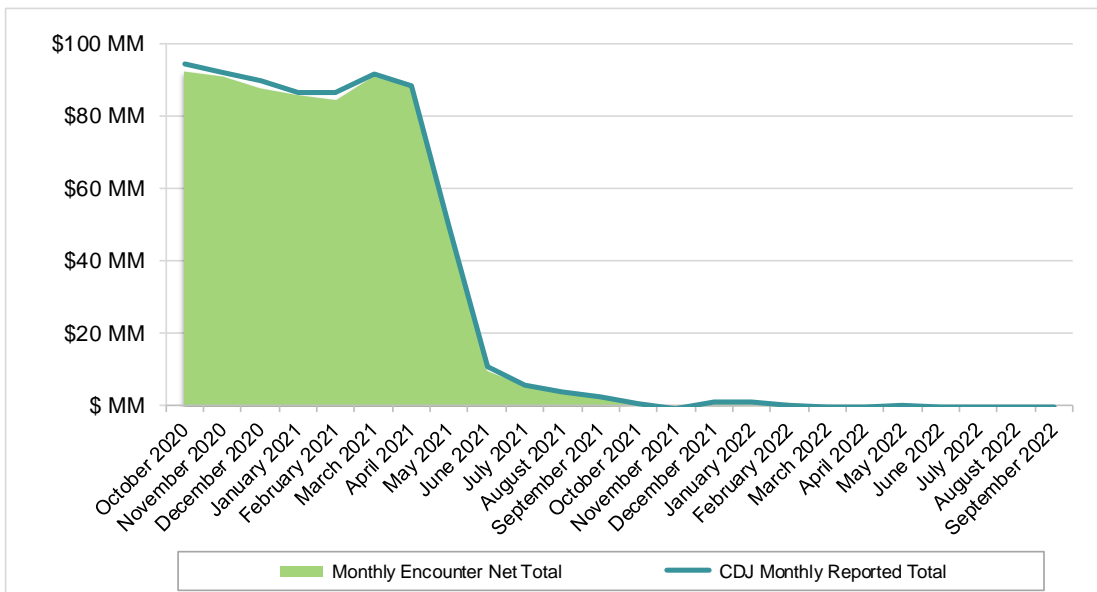
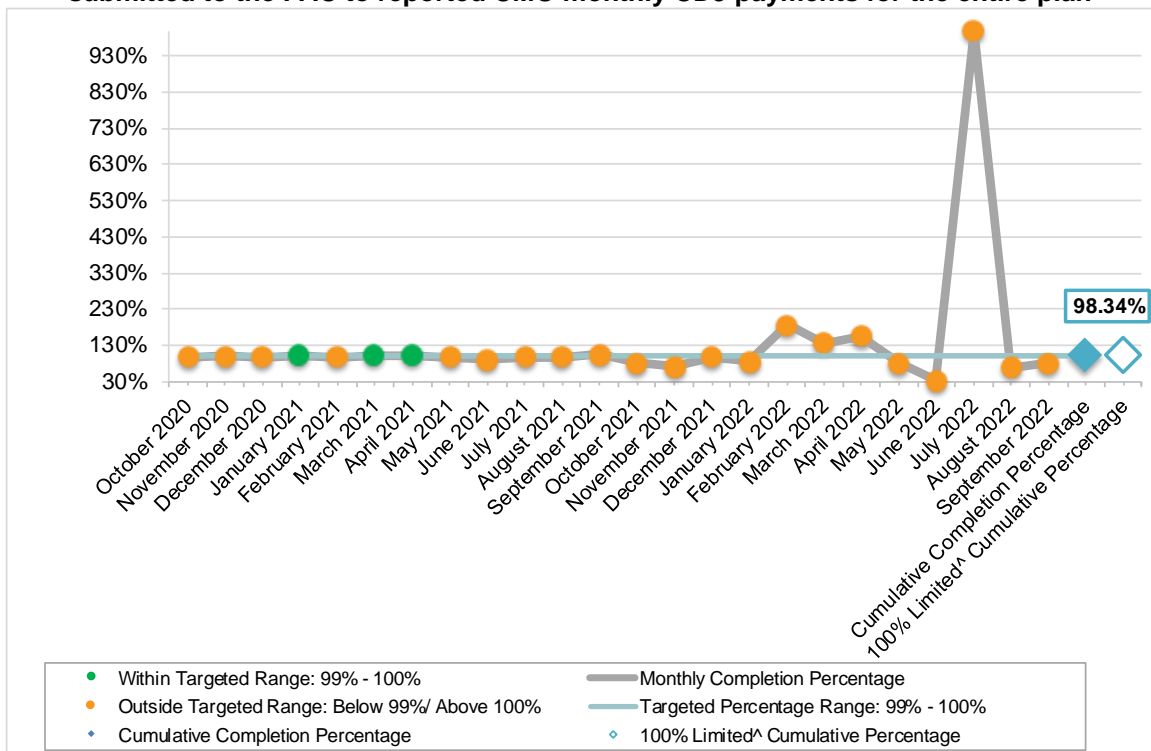


Chart 2. WellCare’s monthly encounter submissions expressed as a percentage of payments submitted to the FAC to reported CMO monthly CDJ payments for the entire plan



^ - Since the Avesis Dental cumulative completion percentage exceeds 100 percent, we have decreased the Entire Plan encounter totals by the total variance in comparison to the CDJ to avoid overstating the Entire Plan results. Please see data analysis assumption number 11 on page 19 for further explanation.

WellCare of Georgia Encounter and CDJ Comparison



**WELLCARE FEE-FOR-SERVICE (NON-VENDOR)
MONTHLY TABLE**

Table 2 — WellCare Fee-for-Service (Non-Vendor)							
Paid Month	Monthly Encounter Total (FAC Reported)	Monthly Encounter Total (Adjustments)	Percentage of Encounters Adjusted	Monthly Encounter Net Total	CDJ Monthly Reported Total	Monthly Variance	Monthly Completion Percentage
October 2020	\$69,106,288	(\$78)	0.00%	\$69,106,210	\$70,954,858	(\$1,848,648)	97.39%
November 2020	\$68,800,478	\$0	0.00%	\$68,800,478	\$69,683,921	(\$883,443)	98.73%
December 2020	\$61,034,101	\$0	0.00%	\$61,034,101	\$63,155,931	(\$2,121,830)	96.64%
January 2021	\$65,585,806	(\$111)	0.00%	\$65,585,696	\$65,957,379	(\$371,683)	99.43%
February 2021	\$62,021,048	\$0	0.00%	\$62,021,048	\$63,810,301	(\$1,789,253)	97.19%
March 2021	\$62,400,079	\$0	0.00%	\$62,400,079	\$62,964,164	(\$564,085)	99.10%
April 2021	\$63,652,560	\$0	0.00%	\$63,652,560	\$63,732,243	(\$79,683)	99.87%
May 2021	\$37,039,935	(\$788)	0.00%	\$37,039,147	\$38,281,601	(\$1,242,454)	96.75%
June 2021	\$9,269,421	\$0	0.00%	\$9,269,421	\$10,364,927	(\$1,095,506)	89.43%
July 2021	\$5,287,583	(\$210)	0.00%	\$5,287,373	\$5,452,115	(\$164,742)	96.97%
August 2021	\$3,558,187	\$0	0.00%	\$3,558,187	\$3,638,142	(\$79,955)	97.80%
September 2021	\$2,265,369	\$0	0.00%	\$2,265,369	\$2,175,678	\$89,691	104.12%
October 2021	\$278,233	\$0	0.00%	\$278,233	\$356,921	(\$78,688)	77.95%
November 2021	(\$429,980)	\$0	0.00%	(\$429,980)	(\$614,183)	\$184,202	70.00%
December 2021	\$1,324,179	\$0	0.00%	\$1,324,179	\$1,356,107	(\$31,928)	97.64%
January 2022	\$894,680	\$0	0.00%	\$894,680	\$1,049,307	(\$154,628)	85.26%
February 2022	\$685,695	\$0	0.00%	\$685,695	\$367,877	\$317,818	186.39%
March 2022	(\$236,977)	\$0	0.00%	(\$236,977)	(\$196,250)	(\$40,727)	120.75%
April 2022	(\$503,187)	\$0	0.00%	(\$503,187)	(\$339,979)	(\$163,208)	148.00%
May 2022	\$178,505	\$0	0.00%	\$178,505	\$219,110	(\$40,605)	81.46%
June 2022	(\$52,758)	\$0	0.00%	(\$52,758)	(\$173,920)	\$121,163	30.33%
July 2022	(\$465,733)	(\$6,209)	1.33%	(\$471,942)	(\$47,297)	(\$424,645)	997.83%
August 2022	(\$295,496)	(\$304)	0.10%	(\$295,800)	(\$436,277)	\$140,477	67.80%
September 2022	(\$281,001)	(\$1,609)	0.57%	(\$282,609)	(\$356,445)	\$73,836	79.28%
Cumulative Totals	\$511,117,016	(\$9,307)	0.00%	\$511,107,708	\$521,356,233	(\$10,248,525)	98.03%
							<i>State Contract Minimum Completeness Percentage Requirement</i>
							99.00%
							Non-Compliant
							-0.97%

WellCare of Georgia Encounter and CDJ Comparison



**WELLCARE CVS HEALTH
MONTHLY TABLE**

Table 3 — WellCare CVS Health (Pharmacy Benefits)

Paid Month	Monthly Encounter Total (FAC Reported)	Monthly Encounter Total (Adjustments)	Percentage of Encounters Adjusted	Monthly Encounter Net Total	CDJ Monthly Reported Total	Monthly Variance	Monthly Completion Percentage
October 2020	\$15,961,898	\$0	0.00%	\$15,961,898	\$16,107,542	(\$145,644)	99.09%
November 2020	\$15,513,839	\$0	0.00%	\$15,513,839	\$15,646,921	(\$133,081)	99.14%
December 2020	\$18,737,879	\$0	0.00%	\$18,737,879	\$18,860,990	(\$123,111)	99.34%
January 2021	\$14,647,610	\$0	0.00%	\$14,647,610	\$14,853,506	(\$205,897)	98.61%
February 2021	\$15,873,909	\$0	0.00%	\$15,873,909	\$16,037,866	(\$163,957)	98.97%
March 2021	\$19,925,519	\$0	0.00%	\$19,925,519	\$20,132,929	(\$207,410)	98.96%
April 2021	\$16,253,064	\$0	0.00%	\$16,253,064	\$16,456,059	(\$202,995)	98.76%
May 2021	\$8,562,963	\$0	0.00%	\$8,562,963	\$8,488,340	\$74,623	100.87%
June 2021	(\$49,348)	\$0	0.00%	(\$49,348)	(\$58,381)	\$9,033	84.52%
July 2021	(\$44,604)	\$0	0.00%	(\$44,604)	(\$44,394)	(\$210)	100.47%
August 2021	\$21,435	\$0	0.00%	\$21,435	\$25,219	(\$3,785)	84.99%
September 2021	(\$2,827)	\$0	0.00%	(\$2,827)	(\$2,978)	\$150	94.95%
October 2021	(\$1,755)	\$0	0.00%	(\$1,755)	(\$1,755)	\$0	100.00%
November 2021	(\$46)	\$0	0.00%	(\$46)	(\$46)	\$0	100.00%
December 2021	(\$14,365)	\$0	0.00%	(\$14,365)	(\$9,797)	(\$4,568)	146.62%
January 2022	(\$15,751)	\$0	0.00%	(\$15,751)	(\$11,554)	(\$4,197)	136.32%
February 2022	(\$2,690)	\$0	0.00%	(\$2,690)	(\$379)	(\$2,311)	709.38%
March 2022	(\$3,459)	\$0	0.00%	(\$3,459)	\$114	(\$3,572)	-3046.87%
April 2022	(\$1,272)	\$0	0.00%	(\$1,272)	(\$1,017)	(\$255)	125.02%
May 2022	(\$1,415)	\$0	0.00%	(\$1,415)	(\$520)	(\$895)	272.15%
June 2022	(\$2,664)	\$0	0.00%	(\$2,664)	\$0	(\$2,664)	
July 2022	(\$1,795)	\$0	0.00%	(\$1,795)	(\$93)	(\$1,702)	1935.66%
August 2022	(\$2,567)	\$0	0.00%	(\$2,567)	(\$50)	(\$2,517)	5148.50%
September 2022	(\$9)	\$0	0.00%	(\$9)	(\$9)	\$0	100.00%
Cumulative Totals	\$125,353,550	\$0	0.00%	\$125,353,550	\$126,478,514	(\$1,124,964)	99.11%
						State Contract Minimum Completeness Percentage Requirement	99.00%

WellCare of Georgia Encounter and CDJ Comparison



**WELLCARE INVOLVE DENTAL
MONTHLY TABLE**

Table 4 — WellCare Involve (Dental)							
Paid Month	Monthly Encounter Total (FAC Reported)	Monthly Encounter Total (Adjustments)	Percentage of Encounters Adjusted	Monthly Encounter Net Total	CDJ Monthly Reported Total	Monthly Variance	Monthly Completion Percentage
January 2021	\$3,318,323	\$0	0.00%	\$3,318,323	\$3,322,877	(\$4,555)	99.86%
February 2021	\$5,400,314	\$0	0.00%	\$5,400,314	\$5,414,475	(\$14,161)	99.73%
March 2021	\$7,018,908	(\$1,392)	-0.01%	\$7,017,517	\$7,067,218	(\$49,701)	99.29%
April 2021	\$6,974,204	(\$455)	0.00%	\$6,973,749	\$6,979,466	(\$5,717)	99.91%
May 2021	\$1,951,509	\$0	0.00%	\$1,951,509	\$1,954,134	(\$2,626)	99.86%
June 2021	\$256,576	(\$9)	0.00%	\$256,567	\$289,891	(\$33,323)	88.50%
July 2021	\$152,906	\$0	0.00%	\$152,906	\$164,886	(\$11,980)	92.73%
August 2021	\$118,777	\$0	0.00%	\$118,777	\$121,959	(\$3,182)	97.39%
September 2021	\$171,182	\$0	0.00%	\$171,182	\$174,665	(\$3,484)	98.00%
October 2021	\$98,331	\$0	0.00%	\$98,331	\$115,227	(\$16,896)	85.33%
November 2021	\$2,616	\$0	0.00%	\$2,616	\$9,564	(\$6,949)	27.34%
December 2021	\$8,804	\$0	0.00%	\$8,804	\$11,760	(\$2,956)	74.86%
January 2022	\$743	\$0	0.00%	\$743	\$1,344	(\$601)	55.27%
February 2022	\$693	\$0	0.00%	\$693	\$1,069	(\$375)	64.88%
March 2022	\$6,550	\$0	0.00%	\$6,550	\$24,643	(\$18,093)	26.57%
April 2022	\$0	\$0		\$0	\$13,473	(\$13,473)	0.00%
May 2022	\$0	\$0		\$0	\$371	(\$371)	0.00%
June 2022	\$0	\$0		\$0	\$690	(\$690)	0.00%
July 2022	\$0	\$0		\$0	\$0	\$0	
August 2022	\$0	\$0		\$0	\$2,597	(\$2,597)	0.00%
September 2022	\$0	\$0		\$0	\$101	(\$101)	0.00%
Cumulative Totals	\$25,480,435	(\$1,855)	0.00%	\$25,478,579	\$25,670,410	(\$191,830)	99.25%
						<i>State Contract Minimum Completeness Percentage Requirement</i>	<i>99.00%</i>

WellCare of Georgia Encounter and CDJ Comparison



**WELLCARE INVOLVE VISION
MONTHLY TABLE**

Table 5 — WellCare Involve (Vision)							
Paid Month	Monthly Encounter Total (FAC Reported)	Monthly Encounter Total (Adjustments)	Percentage of Encounters Adjusted	Monthly Encounter Net Total	CDJ Monthly Reported Total	Monthly Variance	Monthly Completion Percentage
January 2021	\$93,103	\$0	0.00%	\$93,103	\$93,326	(\$224)	99.76%
February 2021	\$230,961	\$0	0.00%	\$230,961	\$233,947	(\$2,986)	98.72%
March 2021	\$387,320	\$0	0.00%	\$387,320	\$389,130	(\$1,810)	99.53%
April 2021	\$508,614	\$0	0.00%	\$508,614	\$512,010	(\$3,396)	99.33%
May 2021	\$228,476	\$0	0.00%	\$228,476	\$228,732	(\$256)	99.88%
June 2021	\$50,865	\$0	0.00%	\$50,865	\$52,999	(\$2,134)	95.97%
July 2021	\$26,417	\$0	0.00%	\$26,417	\$27,044	(\$627)	97.68%
August 2021	\$23,470	\$0	0.00%	\$23,470	\$26,622	(\$3,153)	88.15%
September 2021	\$35,161	\$0	0.00%	\$35,161	\$35,795	(\$634)	98.22%
October 2021	\$2,252	\$0	0.00%	\$2,252	\$3,799	(\$1,547)	59.28%
November 2021	\$60	\$0	0.00%	\$60	\$30	\$30	200.00%
December 2021	\$960	\$0	0.00%	\$960	\$1,048	(\$88)	91.63%
January 2022	\$7,172	\$0	0.00%	\$7,172	\$7,201	(\$29)	99.59%
February 2022	\$236	\$0	0.00%	\$236	\$236	\$0	100.00%
March 2022	\$129	\$0	0.00%	\$129	\$129	\$0	100.00%
April 2022	\$0	\$0		\$0	\$0	\$0	
May 2022	\$0	\$0		\$0	\$0	\$0	
June 2022	\$0	\$0		\$0	\$0	\$0	
July 2022	\$0	\$0		\$0	\$0	\$0	
August 2022	\$0	\$0		\$0	\$0	\$0	
September 2022	\$0	\$0		\$0	\$0	\$0	
Cumulative Totals	\$1,595,195	\$0	0.00%	\$1,595,195	\$1,612,047	(\$16,852)	98.95%
						<i>State Contract Minimum Completeness Percentage Requirement</i>	99.00%
						<i>Non-Compliant</i>	<i>-0.05%</i>

WellCare of Georgia Encounter and CDJ Comparison



**WELLCARE THERAPY NETWORK OF GEORGIA
MONTHLY TABLE**

Table 6 — WellCare Therapy Network of Georgia (Therapy)

Paid Month	Monthly Encounter Total (FAC Reported)	Monthly Encounter Total (Adjustments)	Percentage of Encounters Adjusted	Monthly Encounter Net Total	CDJ Monthly Reported Total	Monthly Variance	Monthly Completion Percentage
October 2020	\$903,249	\$0	0.00%	\$903,249	\$905,697	(\$2,448)	99.72%
November 2020	\$938,866	\$0	0.00%	\$938,866	\$939,833	(\$967)	99.89%
December 2020	\$1,108,329	\$0	0.00%	\$1,108,329	\$1,108,993	(\$664)	99.94%
January 2021	\$772,481	\$0	0.00%	\$772,481	\$771,862	\$619	100.08%
February 2021	\$926,870	\$0	0.00%	\$926,870	\$926,538	\$331	100.03%
March 2021	\$1,213,392	\$0	0.00%	\$1,213,392	\$1,213,618	(\$226)	99.98%
April 2021	\$989,006	\$0	0.00%	\$989,006	\$990,374	(\$1,368)	99.86%
May 2021	\$749,293	\$0	0.00%	\$749,293	\$770,071	(\$20,779)	97.30%
June 2021	\$104,649	\$0	0.00%	\$104,649	\$107,039	(\$2,390)	97.76%
July 2021	\$35,117	\$0	0.00%	\$35,117	\$35,117	\$0	100.00%
August 2021	\$18,549	\$0	0.00%	\$18,549	\$20,710	(\$2,161)	89.56%
September 2021	\$10,936	\$0	0.00%	\$10,936	\$11,166	(\$230)	97.94%
October 2021	\$4,616	\$0	0.00%	\$4,616	\$4,681	(\$65)	98.61%
November 2021	\$928	\$0	0.00%	\$928	\$928	\$0	100.00%
December 2021	\$299	\$0	0.00%	\$299	\$299	\$0	100.00%
January 2022	\$0	\$0		\$0	\$0	\$0	
February 2022	\$625	\$0	0.00%	\$625	\$625	\$0	100.00%
March 2022	\$994	\$0	0.00%	\$994	\$994	\$0	100.00%
April 2022	\$0	\$0		\$0	\$0	\$0	
May 2022	\$0	\$0		\$0	\$0	\$0	
June 2022	\$300	\$0	0.00%	\$300	\$0	\$300	
July 2022	\$0	\$0		\$0	\$0	\$0	
August 2022	\$0	\$0		\$0	\$0	\$0	
September 2022	\$0	\$0		\$0	\$0	\$0	
Cumulative Totals	\$7,778,498	\$0	0.00%	\$7,778,498	\$7,808,546	(\$30,048)	99.61%
							<i>State Contract Minimum Completeness Percentage Requirement</i>
							99.00%

WellCare of Georgia Encounter and CDJ Comparison



**WELLCARE AVESIS DENTAL
MONTHLY TABLE**

Table 7 — WellCare Avesis (Dental)							
Paid Month	Monthly Encounter Total (FAC Reported)	Monthly Encounter Total (Adjustments)	Percentage of Encounters Adjusted	Monthly Encounter Net Total	CDJ Monthly Reported Total	Monthly Variance	Monthly Completion Percentage
October 2020	\$6,048,337	\$0	0.00%	\$6,048,337	\$6,050,916	(\$2,579)	99.95%
November 2020	\$5,539,473	\$0	0.00%	\$5,539,473	\$5,533,003	\$6,470	100.11%
December 2020	\$6,121,385	\$0	0.00%	\$6,121,385	\$6,059,201	\$62,184	101.02%
January 2021	\$1,508,466	\$0	0.00%	\$1,508,466	\$1,498,674	\$9,792	100.65%
February 2021	\$187,738	\$0	0.00%	\$187,738	\$212,382	(\$24,644)	88.39%
March 2021	\$131,152	\$0	0.00%	\$131,152	\$133,646	(\$2,494)	98.13%
April 2021	\$34,177	\$0	0.00%	\$34,177	\$35,887	(\$1,710)	95.23%
May 2021	\$8,433	\$0	0.00%	\$8,433	\$8,203	\$230	102.80%
June 2021	\$37,132	\$0	0.00%	\$37,132	\$37,079	\$52	100.14%
July 2021	(\$20,325)	\$0	0.00%	(\$20,325)	(\$20,557)	\$232	98.87%
August 2021	\$3,160	\$0	0.00%	\$3,160	\$2,687	\$473	117.59%
September 2021	\$9,780	\$0	0.00%	\$9,780	\$7,343	\$2,436	133.17%
October 2021	(\$114)	\$0	0.00%	(\$114)	(\$2,855)	\$2,742	3.97%
November 2021	\$483	\$0	0.00%	\$483	(\$124)	\$607	-390.04%
December 2021	(\$59)	\$0	0.00%	(\$59)	(\$2,326)	\$2,267	2.52%
January 2022	\$0	\$0		\$0	\$0	\$0	
February 2022	\$0	\$0		\$0	\$0	\$0	
March 2022	\$0	\$0		\$0	\$0	\$0	
April 2022	\$0	\$0		\$0	\$0	\$0	
May 2022	\$0	\$0		\$0	\$0	\$0	
June 2022	\$0	\$0		\$0	\$0	\$0	
July 2022	\$0	\$0		\$0	\$0	\$0	
August 2022	\$0	\$0		\$0	\$0	\$0	
September 2022	\$0	\$0		\$0	\$0	\$0	
Cumulative Totals	\$19,609,219	\$0	0.00%	\$19,609,219	\$19,553,160	\$56,058	100.28%
100% Limited^ Cumulative Totals				\$19,553,160	\$19,553,160	\$0	100.00%
							State Contract Minimum Completeness Percentage Requirement
							99.00%

^ - Since the Avesis Dental cumulative completion percentage exceeds 100 percent, we have decreased the Entire Plan encounter totals by the total variance in comparison to the CDJ to avoid overstating the Entire Plan results. Please see data analysis assumption number 11 on page 19 for further explanation.

WellCare of Georgia Encounter and CDJ Comparison



**WELLCARE AVESIS VISION
MONTHLY TABLE**

Table 8 — WellCare Avesis (Vision)							
Paid Month	Monthly Encounter Total (FAC Reported)	Monthly Encounter Total (Adjustments)	Percentage of Encounters Adjusted	Monthly Encounter Net Total	CDJ Monthly Reported Total	Monthly Variance	Monthly Completion Percentage
October 2020	\$449,434	\$0	0.00%	\$449,434	\$451,501	(\$2,067)	99.54%
November 2020	\$404,187	\$0	0.00%	\$404,187	\$406,519	(\$2,332)	99.42%
December 2020	\$673,354	\$0	0.00%	\$673,354	\$670,988	\$2,366	100.35%
January 2021	\$136,753	\$0	0.00%	\$136,753	\$144,874	(\$8,121)	94.39%
February 2021	\$34,915	\$0	0.00%	\$34,915	\$35,759	(\$845)	97.63%
March 2021	\$55,534	\$0	0.00%	\$55,534	\$55,604	(\$70)	99.87%
April 2021	\$9,918	\$0	0.00%	\$9,918	\$8,114	\$1,804	122.23%
May 2021	\$7,784	\$0	0.00%	\$7,784	\$7,924	(\$140)	98.23%
June 2021	\$2,018	\$0	0.00%	\$2,018	\$2,851	(\$833)	70.78%
July 2021	(\$969)	\$0	0.00%	(\$969)	(\$954)	(\$15)	101.57%
August 2021	\$23,556	\$0	0.00%	\$23,556	\$24,666	(\$1,110)	95.49%
September 2021	(\$37)	\$0	0.00%	(\$37)	(\$67)	\$30	55.46%
October 2021	\$1,527	\$0	0.00%	\$1,527	\$1,018	\$510	150.09%
November 2021	\$0	\$0		\$0	\$0	\$0	
December 2021	\$0	\$0		\$0	\$0	\$0	
January 2022	\$0	\$0		\$0	\$0	\$0	
February 2022	\$0	\$0		\$0	\$0	\$0	
March 2022	\$0	\$0		\$0	\$0	\$0	
April 2022	\$0	\$0		\$0	\$0	\$0	
May 2022	\$0	\$0		\$0	\$0	\$0	
June 2022	\$0	\$0		\$0	\$0	\$0	
July 2022	\$0	\$0		\$0	\$0	\$0	
August 2022	\$0	\$0		\$0	\$0	\$0	
September 2022	\$0	\$0		\$0	\$0	\$0	
Cumulative Totals	\$1,797,975	\$0	0.00%	\$1,797,975	\$1,808,797	(\$10,822)	99.40%
							<i>State Contract Minimum Completeness Percentage Requirement</i>
							99.00%



APPENDIX A – DEFINITIONS AND ACRONYMS

The following terms are used throughout this document:

- **Care Management Organization (CMO)** – A private organization that has entered into a risk-based contractual arrangement with the Georgia Department of Community Health (DCH) to obtain and finance care for enrolled Medicaid or PeachCare for Kids® members. CMOs receive a per capita or capitation claim payment from DCH for each enrolled member. Before July 1, 2017, three CMOs were operating in the state of Georgia during the reconciliation period. They were Amerigroup Community Care (Amerigroup or AMG), Peach State Health Plan (PSHP), and WellCare of Georgia (WellCare or WCG). Effective July 1, 2017, CareSource (CS) joined the other three CMOs to provide services to the enrolled members.
- **Cash Disbursement Journal (CDJ) Monthly Reported Total** – The sum of all payments from a CMO or delegated vendor to service providers for a given month as reported by the CMO to DCH.
- **Department of Community Health (DCH)** – The agency in charge of overseeing the health services for the citizens of the state of Georgia.
- **Fiscal Agent Contractor (FAC)** – A contractor selected to design, develop, and maintain the claims processing system, Medicaid Management Information System (MMIS); Gainwell Technologies, formerly DXC Technology, became the effective FAC on November 1, 2010.
- **Gainwell Technologies** – State fiscal agent contractor effective November 1, 2010, formerly known as DXC Technology (DXC).
- **Medicaid Management Information System (MMIS)** – The claims processing system used by the FAC to adjudicate Georgia Medicaid and PeachCare for Kids® claims. CMO submitted encounters are loaded into this system and assigned a unique claim identifier.
- **Monthly Completion Percentage** – The percentage of the monthly encounter net total in relation to the CDJ monthly reported total.
- **Monthly Encounter Net Total** – The sum of the encounter submissions for a given month incorporating the Myers and Stauffer LC encounter data adjustments made to the encounter submissions stored in the FAC's encounter data warehouse.
- **Monthly Encounter Total (Adjustments)** – The sum of all Myers and Stauffer LC adjustments for a given month that were removed from the encounter submissions stored in the FAC's encounter data warehouse.
- **Monthly Encounter Total (FAC Reported)** – The sum of all encounter submissions for a given month stored in the FAC's encounter data warehouse.
- **Monthly Variance** – The difference between the monthly encounter net total and the CDJ monthly reported total.



APPENDIX B – ANALYSIS

Encounters from institutional, medical, and pharmacy service types were combined on like data fields. We analyzed the header reported information of each encounter to capture the amount paid on the entire claim. Encounter totals were calculated by summarizing the data by the CMO paid date, CMO identification number (ID), and specific delegated vendor criteria. Each CMO submitted cash disbursement was summarized by paid date, CMO ID, and specific delegated vendor criteria to create a matching table. These matching tables were combined using common fields and were used to produce the results.

Based on criteria provided by the FAC and/or the CMO, we identified the **WellCare** encounters as follows:

- ❖ **Envolve Dental – Dental Services**
 - Dental claim type of 'D'.
 - Patient account number field contains 'ED' in the third and fourth positions.
- ❖ **Avesis - Dental Services¹**
 - Claims list provided by Wellcare for Avesis dental claims.
 - Dental claim type of 'D' and the patient account number field contains 'DXX' or 'DAX' in the third through fifth positions.
 - Dates of service through December 31, 2020.
- ❖ **Therapy Network of Georgia (TNGA) - Therapy Services**
 - Claim list provided by WellCare for TNGA claims that contain 'XX' in the fourth and fifth positions of the patient account number field.
 - Patient account number field contains 'HN' in the fourth and fifth positions.
- ❖ **Envolve Vision – Vision Services**
 - Patient account number field contains 'EV' in the third and fourth positions.
- ❖ **Avesis - Vision Services²**
 - Claims list provided by WellCare for Avesis vision claims.
 - Patient account number field contains 'AV' in the fourth and fifth positions.
 - Dates of service through December 31, 2020.
- ❖ **CVS Health - Pharmacy Benefits**
 - Pharmacy claim types of 'P' and 'Q'.
- ❖ **WellCare - Fee-for-Service (Non-Vendor)**
 - All other plan submitted encounters that do not meet the listed criteria.

1 – Replaced by Envolve Dental – Effective January 1, 2021.

2 – Replaced by Envolve Vision – Effective January 1, 2021.



APPENDIX C – DATA ANALYSIS ASSUMPTIONS

1. There are instances where the monthly completion percentages in the entire plan, delegated vendor, and/or fee-for-service (non-vendor) completion monthly tables exceeded 100 percent during some months of the reporting period. These overstated monthly completion rates may be due to certain claim voids and replacements that were absent from the encounter data, but were accounted for in the CDJ. Also, duplicate records may have existed in the encounter data that we were unable to identify and remove. Additionally, CDJ payment dates may not have matched the payment dates that were reported in the encounter data.
2. Since CDJ files submitted by the plans and their delegated vendors are not separated by Georgia Families region, the data does not permit providing region-specific information for any CMO.
3. When the CMO submits an adjustment encounter, the FAC's encounter processing system automatically creates a void for the original (replaced) encounter. These system-generated voids bear the same paid date as the original encounter. At the direction of DCH, and in order to more accurately reconcile to the cash payments, we have attempted to match these voids' paid dates to the adjustment dates.
4. Instances were noted where a record's transaction type implied a specific sign valuation for the CMO paid amount (e.g., a void implied that the amount should be negative). However, the data submitted for these records did not accurately reflect the correct sign valuation. Where possible, these CDJ and/or encounter payment amounts were adjusted to reflect the expected sign of the payment in accordance with the transaction type.
5. We instructed the CMOs to exclude referral fees, management fees and other non-encounter related fees from the CDJ data that is submitted to Myers and Stauffer LC. We reviewed the CDJs for these payments and removed them from the analysis when they were identified.
6. Separately itemized interest expenses are excluded from the CDJ and encounter totals when the interest amounts are included in the CMO paid amounts on the encounters and/or CDJ transaction amounts.
7. During the course of our analysis, and subsequent on-site procedures authorized by DCH, we discovered that certain encounter adjustments occurring after the initial encounter submissions have not been provided to the FAC. As a result, we noted throughout our analysis that certain claim voids and replacements may be absent from the encounter data but may be accounted for in the CDJ files. This issue may impact WellCare's overall completion percentage.
8. Percentage ratios noted in this report are rounded down. The sum of the percentages may not add up to the percentage sum total (Tables A and B).
9. Opportunities for improving the encounter reconciliation process have been identified during the analysis of the encounter data and cash disbursement journals, as well as frequent interactions with the CMOs, their delegated vendors, DCH, and its FAC. While we have attempted to account for these situations, other potential issues within the data may exist that have not yet been identified which may require us to restate prior reports or modify reconciliation processes in the future.
10. Effective May 1, 2021, WellCare merged with Peach State Health Plan. The combined entity is now operating under the Peach State name. This analysis will be performed to review the encounter data for completeness for services rendered by WellCare prior to its members transitioning to another CMO.
11. A cumulative completion percentage exceeding 100 percent was noted for the WellCare totals for Avesis Dental. So that the impacted amounts do not overstate the Entire Plan results, we have decreased the encounter monthly reported totals by the variance between the encounter data and cash disbursement journals. Therefore, the cumulative completion percentages are decreased to a maximum of 100 percent (Tables A, 1, and 7; Chart 2).