

### Ventura County Medi-Cal Managed Care Commission (VCMMCC) dba Gold Coast Health Plan Executive / Finance Committee Meeting

2240 E. Gonzales, Suite 280, Oxnard, CA 93036 **Thursday, April 3, 2014 3:00 p.m.** 

### **AGENDA**

### **CALL TO ORDER / ROLL CALL**

**PUBLIC COMMENT:** A Speaker Card must be completed and submitted to the Clerk of the Board by anyone wishing to comment:

- Public Comment Comments regarding items not on the agenda but within the subject matter jurisdiction of the Commission.
- Agenda Item Comment Comments within the subject matter jurisdiction of the Commission
  pertaining to a specific item on the agenda. The speaker is recognized and introduced by the
  Commission Chair during Commission's consideration of the item.

### 1. APPROVE MINUTES

a. January 9, 2014 Regular Executive / Finance Meeting Minutes

### 2. ACCEPT AND FILE ITEMS

- a. CEO Update
- b. February Financials

Meeting Agenda available at http://www.goldcoasthealthplan.org

ADMINISTRATIVE REPORTS RELATING TO THIS AGENDA AND MATERIALS RELATED TO AN AGENDA ITEM SUBMITTED TO THE COMMISSION AFTER DISTRIBUTION OF THE AGENDA PACKET ARE AVAILABLE FOR PUBLIC REVIEW DURING NORMAL BUSINESS HOURS AT THE OFFICE OF THE CLERK OF THE BOARD, 1701 LOMBARD STREET, SUITE 100, OXNARD, CA.

IN COMPLIANCE WITH THE AMERICANS WITH DISABILITIES ACT, IF YOU NEED SPECIAL ASSISTANCE TO PARTICIPATE IN THIS MEETING, PLEASE CONTACT TRACI AT 805/889-6900. REASONABLE ADVANCE NOTIFICATION OF THE NEED FOR ACCOMMODATION PRIOR TO THE MEETING (48 HOURS ADVANCE NOTICE IS PREFERABLE) WILL ENABLE US TO MAKE REASONABLE ARRANGEMENTS TO ENSURE ACCESSIBILITY TO THIS MEETING



Ventura County Medi-Cal Managed Care Commission (VCMMCC) dba Gold Coast Health Plan, Executive Finance Committee Meeting Agenda (continued)

PLACE: 2240 E. Gonzalez, Room 280, Oxnard, CA

**DATE:** April 3, 2014 **TIME:** 3:00 p.m.

### 3. <u>INFORMATIONAL ITEMS</u>

a. Update on Auditor Recommendations

b. <u>Legislative Update</u>

### **CLOSED SESSION**

 Closed Session Conference with Legal Counsel – Existing Litigation Pursuant to Government Code Section 54956.9 – St. Rita's Haven v. Gold Coast Health Plan, et al, Superior Court of California, County of Los Angeles, Case Number PC055569

2. Closed Session pursuant to Government Code Section 54957(e)

Public Employee Performance Evaluation

Title: Chief Executive Officer

Announcement from Closed Session, if any.

### **COMMENTS FROM COMMITTEE MEMBERS**

### **ADJOURNMENT**

Unless otherwise determined, the next regular meeting of the Executive / Finance Committee Meeting will be held on May 1, 2014 at 3:00 p.m. at 2240 E. Gonzales Road, Suite 280, Oxnard CA 93036

Meeting Agenda available at http://www.goldcoasthealthplan.org

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### Ventura County Medi-Cal Managed Care Commission (VCMMCC) dba Gold Coast Health Plan (GCHP) Executive / Finance Committee Meeting Minutes January 9, 2014

(Not official until approved)

### **CALL TO ORDER**

Legal Counsel Kierstyn Schreiner called the meeting to order at 3:01 p.m. in Suite 280 at the Ventura County Public Health Building located at 2240 E. Gonzales Road, Oxnard, CA 93036.

As a result of the Chair and Vice Chair not being present at the meeting, Committee Member Fisler moved to have Committee Member Glyer preside as the chair of the meeting. Committee Member Pawar seconded. The motion carried. **Approved 3-0** with the following vote:

AYE: Fisler, Glyer and Pawar.

NAY: None. ABSTAIN: None.

ABSENT: Gonzalez and Juarez.

### **COMMITTEE MEMBERS PRESENT**

**Eileen Fisler**, Ventura County Medical Health System **David Glyer**, Private Hospitals / Healthcare System **Gagan Pawar**, **MD**, Clinicas del Camino Real, Inc.

### ABSENT / EXCUSED

**Robert Gonzalez, MD**, Ventura County Medical Health System **Roberto Juarez**, Clinicas del Camino Real, Inc.

### STAFF IN ATTENDANCE

Michael Engelhard, CEO
Michelle Raleigh, CFO
Nancy Kierstyn Schreiner, Legal Counsel
Traci R. McGinley, Clerk of the Board
Al Reeves, MD, CMO
Melissa Scrymgeour, CIO
Ruth Watson, COO
Steve Lalich, Communications Director
Allen Maithel, Controller
Lyndon Turner, Financial Analysis Director

### **PUBLIC COMMENTS**

Christine Velasco, Clinicas CFO, asked why GCHP was treating the Low Income Health Plan (LIHP) population differently than other member groups. She added that it is causing Clinicas to treat GCHP Members as if it has a two-tier program. She closed stating that the Members are being denied access to Clinicas specialty services because GCHP does not have adequate data on this population.

Chair Glyer stated that he understood this population was previously with the County and GCHP had received that data.

CEO Engelhard explained that GCHP advised providers in November and December that GCHP would initially be reimbursing for this population on a fee-for-service (FFS) basis in lieu of a capitated rate because GCHP did not receive adequate data to establish a capitated rate for these members at this time. GCHP obtained only a portion of the needed data on this population and cost data was not included. The Plan will need several months of data before it can adequately determine the rates for this population. CEO Engelhard added that GCHP has other new Members that were not in LIHP and the Plan needs to understand the costs and utilization of the groups as well. Most importantly, the Members in this population have been assigned to PCPs and have access to care.

Dr. Enrique De La Garza, Americas Health Plan (AHP) CEO, stated that when GCHP first started the County did not have utilization data. He requested GCHP reconsider this position.

### 1. <u>APPROVE MINUTES</u>

### a. November 7, 2013 Regular Meeting Minutes

Committee Member Fisler moved to approve the November 7, 2013 Regular Meeting Minutes. Committee Member Pawar seconded. The motion carried. **Approved 3-0** with the following vote:

AYE: Fisler, Glyer and Pawar.

NAY: None. ABSTAIN: None.

ABSENT: Gonzalez and Juarez.

### 2. ACCEPT AND FILE ITEMS

### a. CEO Update

CEO Engelhard reviewed the written report with the Committee.

### **b.** October Financials (Unaudited)

CFO Raleigh reviewed the unaudited October financials and highlighted that the Plan is receiving clarification on what the rates will be this fiscal year. Additional CBAS revenue

was received and an amount was set-aside for the AB 97 provider reductions expected to be made by the State starting in October.

After questions were raised by the Committee, CEO Engelhard noted that the Plan will research the figures in the "120 plus days" on the Paid Claims Composition chart and clarify the information with the Committee.

### c. November Financials (Unaudited)

CFO Raleigh reviewed the unaudited November financials.

Committee Member Fisler moved to accept the CEO Report, the October Financials and the November Financials. Committee Member Pawar seconded. The motion carried. **Approved 3-0** with the following vote:

AYE: Fisler, Glyer and Pawar.

NAY: None. ABSTAIN: None.

ABSENT: Gonzalez and Juarez.

### 3. <u>INFORMATIONAL ITEMS</u>

### a. Amended FY 2013-14 Budget

CEO Engelhard advised the Committee that since the State budget was finalized, the Plan received additional information on how the Affordable Care Act (ACA) is being implemented. The majority of GCHP's budget has been updated using the new information and it is incorporated in the presentation included in the Agenda Packet. CFO Raleigh added that the State believes that the ACA new Medi-Cal expansion population will be high users based on the estimated rates provided by the State.

### b. <u>Legislative Update (Year-End)</u>

This matter was not reviewed and there were no questions from the Committee.

### c. Affordable Care Act (ACA) Update

COO Watson explained that this was covered under the Amended FY 2013-14 Budget Item.

### **COMMENTS FROM COMMITTEE MEMBERS**

None.

### **CLOSED SESSION**

Legal Counsel Kierstyn Schreiner explained the purpose of the Closed Session items.

### **ADJOURN TO CLOSED SESSION**

The Committee adjourned to Closed Session at 4:25 p.m. regarding the following items:

Closed Session Conference with Legal Counsel – Existing Litigation pursuant to Government Code Section 54956.9 Sziklai v. Gold Coast Health Plan et al VCSC Case No. 56-2012-00428086-CU-WT-VTA

### **RETURN TO OPEN SESSION**

The Regular Meeting reconvened at 4:27 p.m.

Legal Counsel Kierstyn Schreiner announced that there was no reportable action.

### **ADJOURNMENT**

Meeting adjourned at 4:33 p.m.



### **AGENDA ITEM 2a**

To: Gold Coast Health Plan Executive / Finance Committee

From: Michael Engelhard, Chief Executive Officer

Date: April 3, 2014

Re: CEO Update

### **Compliance – CAP Update**

The Plan received an updated version of the consolidated corrective action plan, Addendum B (Medical) report on March 20, 2014 from the Department of Health Care Services. The Addendum B of the consolidated corrective action plan issued to the Plan identified over 100 items as deficient. The Plan is pleased to report the closure of all but four (4) items. The Plan has thirty days from the date of receipt to provide a response to (DHCS) on the remaining items.

### **ICD-10 Delay**

On March 28, 2014, the House of Representatives, via H.R. 4302, voted to delay the transition of the ICD9 code set to ICD10 under the Medicare program by one year. The new ICD10 implementation date is October 1, 2015. The U.S. Senate is set to debate this issue on March 31, 2014. The Plan has not received guidance from the State of California on the impact to the Medi-Cal program at this time.

### Membership

In April membership grew by another 6,811 members and Plan enrollment now stands at approximately 141,000. Membership has grown significantly since December 31, 2013, adding 21,249 members to GCHP. This growth has been due primarily to ACA and Medi-Cal expansion – 8,134 from the ACE / LIHP program, 4,514 new Medi-Cal Expansion members and 4,268 members from the state's outreach to CalFRESH members.

### Move

The Plan will be moving offices over the weekend and will begin operations at 711 E. Daily Drive in Camarillo on Monday, April 7, 2014.

### **ACA 1202 Physician Payments**

The Plan participated in a call with DHCS and other health plans on March 28, 2014 to discuss concerns with the ACA 1202 physician payment reconciliation process. As communicated to the Commission on March 24, 2014 the State's current reconciliation methodology places the Plan at risk for payments that may not be reimbursed by the State. The State committed to studying this further this week and to discussing options with the plans.



### **AGENDA ITEM 2b**

To: Gold Coast Health Plan Executive / Finance Committee

From: Michelle Raleigh, Chief Financial Officer

Date: April 3, 2014

Re: February 2014 Financials

### **SUMMARY**

Staff is presenting the attached February 2014 financial statements of Gold Coast Health Plan (Plan) for review by the Executive / Finance Committee.

### **BACKGROUND / DISCUSSION**

The Plan has prepared the February 2014 financial package, including balance sheet, income statements and statements of cash flows.

### FISCAL IMPACT

### **Year-To-Date Results**

On a year-to-date basis, the Plan's net income is approximately \$14.3 million compared to \$11.3 million assumed in the budget. These operating results have contributed to a Tangible Net Equity (TNE) level of approximately \$26.2 million, which exceeds both the budget of \$23.2 million by \$3.0 million and the State required TNE amount as of February 28, 2014 of \$14.5 million (84% of \$17.2 million, which is the amount needed to achieve 100% of the calculated TNE requirement) by \$11.7 million. Please note the following:

- 1. The Plan's TNE amount includes \$7.2 million in lines of credit with the County of Ventura.
- 2. The YTD TNE excludes the ACA 1202 funds since the Plan is continuing discussions with the State regarding whether these payments to qualifying providers are actual "pass through" funds, as assumed in the budget.

### **February Results**

Other items to note for the month include:

<u>Membership</u> - The Plan's February membership was 133,041 which exceeded budget by 674 members. This is a 10.6% increase from the December 31, 2013 total of 120,275 and a 32.4% increase from February 2013 when enrollment stood at 100,522.



Revenue – February net revenue was \$35.9 million or \$0.6 million less than budget of \$36.5 million. On a per member per month (PMPM) basis, net revenue was \$269.71 PMPM which was \$5.99 PMPM less than budget of \$275.70 PMPM. The variance is driven by:

- Membership mix being different than estimated in the budget, primarily driven by the fact that Adult Expansion membership was approximately 2,000 members less than expected in the budget, resulting in revenue of approximately \$1.0 million lower.
- Mental health revenue is now being accrued and the February financials include two months of accrual (for January and February). Therefore, the effect of accruing an extra month of anticipated revenue for this new benefit results in revenue of approximately \$0.3 million higher than budget.

<u>Health Care Costs</u> – Heath care costs for February were \$31.0 million and were \$1.8 million better than budget. On a PMPM basis, reported health care costs were \$232.65 PMPM versus a budgeted amount of \$247.30. Drivers for the favorable variance include:

- Inpatient Hospital costs have been trending downward since January which had additional reserves added to cover emerging winter illness utilization. After peaking in January, census figures are reflecting reduced hospitalization.
- Long-Term Care An additional accrual was included in February for estimated AB 1629 rate increases (which will be paid retroactively to August, 2013 as required) for selected facilities.
- Pharmacy Pharmacy expense have risen substantially, due in part to the new Adult Expansion population and a new Hepatitis C drug (Sovaldi).

Note that the health care expenses for the new Adult Expansion population will be limited to at least 85% of revenues, due to the medical loss ratio (MLR) corridor provision included in the Plan's contract with DHCS. This MLR corridor is summarized below in that the:

- Plan will return revenues if the MLR (i.e., health care costs divided by revenues) is less than 85%.
- Plan will receive additional revenues if the MLR is more than 95%.

Therefore, the February financials reflect an estimated 85% MLR for pharmacy. Other services will be evaluated as claims data is received. The Plan is having discussions with the auditors regarding future treatment of this provision.

<u>Administrative Expenses</u> – For the month, overall operational costs were \$2.2 million or \$0.09 million better than budget. The favorable variance resulted primarily from lower than forecasted personnel costs due to timing of new hires versus that



projected in the budget. The headcount at February 28, 2014 was 113 versus a budget of 119.

<u>Cash + Medi-Cal Receivable</u> - The total of Cash and Medi-Cal Premium Receivable balances of \$120.8 million reported as of February 28, 2014 included a MCO Tax component amounting to \$24.1 million. Excluding the impact of the tax, the total of Cash and Medi-Cal Receivable balance as of February 28, 2014 was \$96.7 million, or \$14.5 million better than the budgeted level of \$82.2 million.

Note that the State has not yet been paying GCHP capitation rates that include the new mental health benefit. It is anticipated that payments will begin in the next couple of months, because a temporary rate increase has been included in a recent contract amendment. This is anticipated to be a temporary rate increase until CMS has approved the State mental health rate estimates.

<u>Fixed Assets</u> – Work at the Plan's new offices at 711 East Daily Drive is progressing with full completion expected in early April. Current plans are for an April 7, 2014 move-in date. Capital expenditures for the new facility are expected to be \$682,000 and were approved by the Commission in January 2014. The cost incurred through February is approximately \$100,000.

### RECOMMENDATION

Staff requests the Executive / Finance Committee recommend approval of the February, 2014 financial statements to the Commission.

### CONCURRENCE

N/A

### **Attachment**

February 2014 Financial Package.



FINANCIAL PACKAGE
For the month ended February 28, 2014

### TABLE OF CONTENTS

- Financial Overview
- Membership
- Income Statement
- PMPM Income Statement by Month
- Paid Claims and IBNP Composition

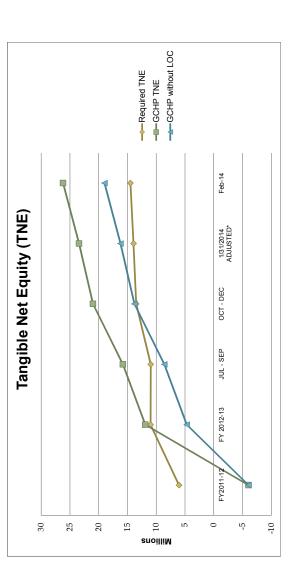
### **APPENDIX**

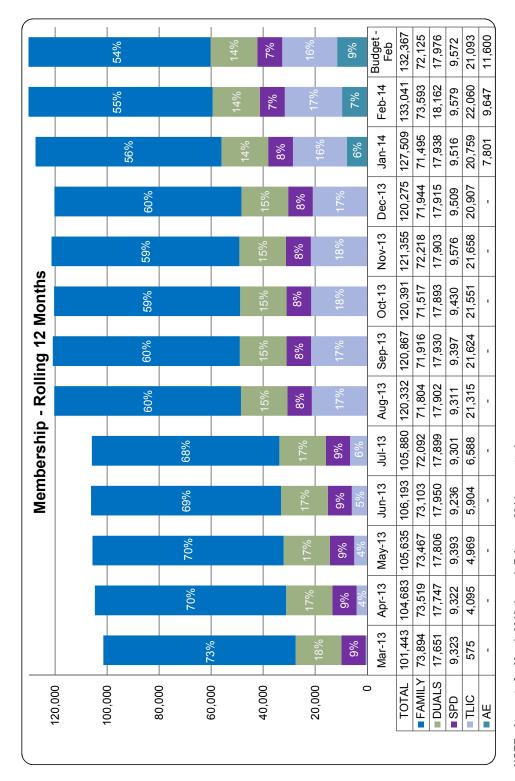
- Comparative Balance Sheet
- YTD Income Statement
- Cash & Medi-Cal Receivable Trend
- Total Expenditure Composition
- Statement of Cash Flows
- Pharmacy Cost & Utilization Trends

Financial Overview

	AUDITED	AUDITED		UNAUD	UNAUDITED FY 2013-14 Actual	-14 Actual		3png	<b>Budget Comparison</b>	ou
Description	FY2011-12	FY 2012-13	JUL - SEP	OCT - DEC	1/31/2014 ADJUSTED*	Feb-14	∕TD ADJUSTED*	Budget YTD	Variance Fav/(Unfav)	Variance Fav/(Unfav) %
Member Months	1,258,189	1,223,895	347,079	362,021	127,509	133,041	969,650	969,948	(298)	(0.0)%
Revenue pmpm	<b>304,635,932</b> 242.12	<b>315,119,611</b> 257.47	81,988,709 236.22	<b>84,070,456</b> 232.23	<b>33,239,770</b> 260.69	<b>35,881,985</b> 269.71	235,180,920 242.54	<b>236,699,972</b> 244.03	(1,519,052) (1.49)	%(9·0) %(9·0)
Health Care Costs pmpm % of Revenue	<b>287,353,672</b> 228.39 94.3%	280,382,704 229.09 89.0%	<b>71,875,533</b> 207.09 87.7%	<b>72,867,512</b> 201.28 86.7%	28,583,258 224.17 86.0%	<b>30,952,027</b> 232.65 86.3%	204,278,330 210.67 86.9%	208,576,431 215.04 88.1%	4,298,100 4.37 -1.3%	2.1 % 2.0 % -1.4%
Admin Exp pmpm % of Revenue	<b>18,891,320</b> 15.01 6.2%	<b>24,013,927</b> 19.62 7.6%	<b>6,202,007</b> 17.87 7.6%	<b>6,014,475</b> 16.61 7.2%	<b>2,245,874</b> 17.61 6.8%	<b>2,154,133</b> 16.19 6.0%	16,616,491 17.14 7.196	16,805,854 17.33 7.1%	189,363 0.19 0.0%	1.1 % 1.1 % 0.5%
Net Income pmpm % of Revenue	(1,609,063) (1.28) -0.5%	10,722,980 8.76 3.4%	3,911,169 11.27 4.8%	<b>5,188,469</b> 14.33 6.2%	2,410,637 18.91 7.3%	<b>2,775,825</b> 20.86 7.7%	14,286,099 14.73 6.1%	11,317,688 11.67 4.8%	2,968,412 3.06 1.3%	26.2 % 26.3 % 27.0%
100% TNE % TNF Required	16,769,368	16,138,440	16,112,437	16,056,217	16,597,381	17,247,717	17,247,717	17,204,652	43,065	0.3 %
Required TNE  GCHP TNE  TNE Excess / (Deficiency)	6,036,972 (6,031,881) (12,068,853)	10,974,139 11,891,099 916,960	10,956,457 15,802,268 4,845,810	13,487,223 20,990,738 7,503,516	13,941,800 <b>23,401,375</b> <b>9,459,575</b>	14,488,083 <b>26,177,200</b> <b>11,689,117</b>	14,488,083 26,177,200 41,689,117	14,451,908 23,208,788 8,756,860	36,175 2,968,412 2,932,237	0.3 % 12.8 % 33.5 %
							/	١		

Note: TNE amount includes \$7.2 million related to the Lines of Credit (LOC) from Ventura County.
\* Adjusted results remove the ACA 1202 payments (\$5.2 million) from both revenue and health care costs in order to compare to the budget (since budget assumed these funds were



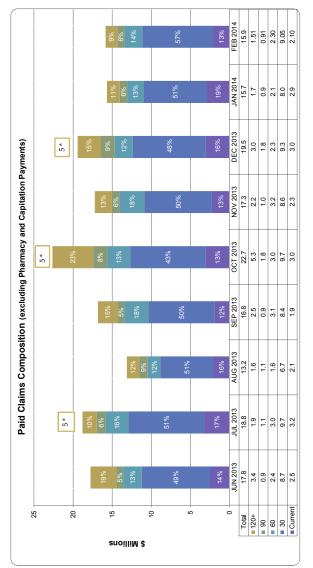


NOTE: Amounts for March 2013 through February 2014 are actuals SPD = Seniors and Persons with Disabilities

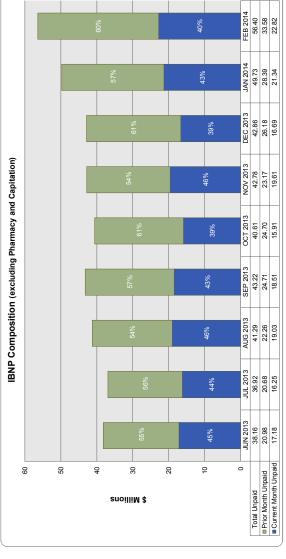
TLIC = Targeted Low Income Children AE = Adult Expansion

		2014 Actual N	Monthly Trend				Current Mont	h
•	SEP 2013	OCT 2013	NOV 2013	DEC 2013	JAN 2014	FEB	2014	Variance
•						Actual	Budget	Fav/(Unfav)
Membership (includes retro members)	120,867	120,391	121,355	120,275	127,509	133,041	132,367	674
Revenue:								
Premium	\$ 29,602,003	\$ 29,980,945	\$ 29,108,732	\$ 29,047,006	\$ 40,250,143	\$ 37,669,204	\$ 38,204,978	\$ (535,774)
Reserve for Rate Reduction	-	(278,508)	(282,654)	(281,754)	(425,684)	(387,418)	(257,539)	(129,879)
MCO Premium Tax	(1,068,828)	(1,149,386)	(1,114,454)	(1,110,666)	(1,467,377)	(1,451,360)	(1,504,321)	52,961
Total Net Premium	28,533,175	28,553,050	27,711,624	27,654,585	38,357,083	35,830,427	36,443,119	(612,692)
Other Revenue:								
Interest Income	11,819	15,509	8,658	12,031	11,688	14,272	11,844	2,429
Miscellaneous Income Total Other Revenue	38,333 50,152	38,333	38,333	38,333 50.364	38,333 50,021	37,286 51,559	38,333	(1,047)
	•	53,842	46,991		,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	50,177	1,382
Total Revenue	28,583,327	28,606,892	27,758,615	27,704,949	38,407,105	35,881,985	36,493,296	(611,310)
Medical Expenses:								
Capitation (PCP, Specialty, Kasier, NEMT & Vision	1,533,277	1,597,311	1,616,715	1,610,161	1,609,561	1,679,455	1,661,631	(17,823)
FFS Claims Expenses:								
Inpatient	5,531,725	5,200,045	4,229,618	4,491,812	5,733,670	5,139,891	7,047,076	1,907,185
LTC/SNF Outpatient	6,003,374	8,189,391 2,762,602	7,051,854	6,923,947	6,871,300	7,988,436	6,021,352	(1,967,084)
Outpatient	2,281,073 96,573	101,182	3,112,769 149,563	3,189,204 111,157	3,582,927 352,687	3,057,728 450,809	3,316,793 474,340	259,065 23,531
Laboratory and Radiology  Physician ACA 1202	90,573	101,102	149,565	111,157	5,167,335	104,094	474,340	(104,094)
Emergency Room	803,936	847,968	788,033	729,901	850,311	871,674	984,266	112,592
Physician Specialty	1,725,887	1,575,483	1,903,339	2,305,009	2,353,215	1,930,722	2,608,213	677,491
Mental Health Services	-	-	-	-	225,017	233,276	191,776	(41,500)
Pharmacy	3,172,116	3,599,699	3,026,831	3,210,998	3,863,088	5,657,345	5,995,501	338,156
Other Medical Professional	249,684	25,851	153,013	149,068	141,578	192,695	175,485	(17,210)
Other Medical Care	1,621	-	-	3,608	(1,935)	-	-	-
Other Fee For Service	2,100,151	1,998,727	1,800,032	1,645,707	2,634,006	2,870,527	3,096,463	225,935
Transportation	178,553	73,220	88,442	67,551	86,625	83,111	87,155	4,044
Total Claims	22,144,693	24,374,168	22,303,494	22,827,961	31,859,823	28,580,309	29,998,420	1,418,111
Medical & Care Management Expense	746,163	738,701	722,455	830,780	824,092	774,659	872,273	97,614
Reinsurance	277,448	(1,222,910)	277,386	(1,553,135)	(395,380)	104,962	202,521	97,559
Claims Recoveries	104,688	(432,352)	(564,043)	(259,182)	(147,503)	(187,358)	<u> </u>	187,358
Sub-total	1,128,300	(916,560)	435,798	(981,537)	281,209	692,263	1,074,794	382,531
Total Cost of Health Care	24,806,270	25,054,919	24,356,007	23,456,586	33,750,593	30,952,027	32,734,845	1,782,818
Contribution Margin	3,777,057	3,551,973	3,402,608	4,248,363	4,656,511	4,929,959	3,758,451	1,171,508
General & Administrative Expenses:					33,750,593			
Salaries and Wages	453,818	497,163	575,414	592,047	596,197	577,942	611,325	33,383
Payroll Taxes and Benefits	114,103	119,840	124,386	151,109	187,611	90,406	143,216	52,810
Travel and Training	10,686	13,879	10,975	4,315	4,276	9,270	15,237	5,967
Outside Service - ACS	1,190,847	958,836	912,065	940,933	968,191	1,024,850	1,003,201	(21,650)
Outside Services - Other	33,271	24,974	757	19,158	79,142	180,177	81,966	(98,211)
Accounting & Actuarial Services	46,568	70,000	(71,621)	12,500	56,250	14,226	13,333	(893)
Legal	54,932	45,876	67,706	88,066	114,004	47,032	36,340	(10,692)
Insurance	12,517	12,057	13,138	13,265	9,615	12,477	10,792	(1,685)
Lease Expense - Office	28,480	22,503	28,480	25,980	28,480	28,979	38,480	9,501
Consulting Services	264,998	118,908	(17,517)	42,604	46,831	53,700	104,310	50,610
Translation Services	2,778	4,225	1,638	3,602	8,387	2,554	2,417	
Advertising and Promotion	۷,110	4,225	3,985	1,883	0,307	790	11,460	(137) 10,670
General Office	77,654	100,062	98,180	115,766	96,638	83,285	112,597	29,312
Depreciation & Amortization	6,492	7,015	7,015	7,015	7,015	7,015	33,374	26,359
Printing	5,605	26,510	20,347	2,022	10,344	862	14,819	13,957
Shipping & Postage	1,016	11,395	13,389	562	14,021	5,822	3,405	(2,417)
Interest	37,708	107,768	45,473	18,828	18,873	14,746	10,610	(4,136)
Total G & A Expenses	2,341,473	2,141,010	1,833,810	2,039,656	2,245,874	2,154,133	2,246,882	92,749
·								
Net Income / (Loss)	\$ 1,435,584	\$ 1,410,963	\$ 1,568,798	\$ 2,208,708	\$ 2,410,637	\$ 2,775,825	\$ 1,511,568	\$ 1,264,257

		2044 A atual M	a mála la c Tura m al			FEB 20	M4	Vanianas
	SEP 2013	2014 Actual M OCT 2013	NOV 2013	DEC 2013	JAN 2014	Actual	Budget	Variance Fav/(Unfav)
•	3LF 2013	001 2013	1404 2013	DEC 2013	3AN 2014	Actual	Duaget	Tav/(Olliav)
Membership (includes retro members)	120,867	120,391	121,355	120,275	127,509	133,041	132,367	674
Revenue:								
Premium	244.91	249.03	239.86	241.50	315.67	283.14	288.63	(5.49)
Reserve for Rate Reduction	-	(2.31)	(2.33)	(2.34)	(3.34)	(2.91)	(1.95)	(0.97)
MCO Premium Tax  Total Net Premium	(8.84) <b>236.07</b>	(9.55) <b>237.17</b>	(9.18) <b>228.35</b>	(9.23) <b>229.93</b>	(11.51) <b>300.82</b>	(10.91) <b>269.32</b>	(11.36) <b>275.32</b>	0.46 (6.00)
Other Revenue:								
Interest Income	0.10	0.13	0.07	0.10	0.09	0.11	0.09	0.02
Miscellaneous Income	0.32	0.32	0.32	0.32	0.30	0.28	0.29	(0.01)
Total Other Revenue	0.41	0.45	0.39	0.42	0.39	0.39	0.50	(0.11)
Total Revenue	236.49	237.62	228.74	230.35	301.21	269.71	275.70	(5.99)
Medical Expenses:	10.00	40.07	10.00	40.00	40.00	40.00	40.55	0.07
Capitation (PCP, Specialty, Kasier, NEMT & Visior	12.69	13.27	13.32	13.39	12.62	12.62	12.55	0.07
FFS Claims Expenses:	45.77	42.10	24.95	27.25	44.07	20.62	52.24	14.61
Inpatient LTC/SNF	45.77 49.67	43.19 68.02	34.85 58.11	37.35 57.57	44.97 53.89	38.63 60.04	53.24 45.49	14.61 (14.55)
Outpatient	18.87	22.95	25.65	26.52	28.10	22.98	25.06	2.07
Laboratory and Radiology	0.80	0.84	1.23	0.92	2.77	3.39	3.58	0.20
Physician ACA 1202	-	-	-	-	40.53	0.78	-	(0.78)
Emergency Room	6.65	7.04	6.49	6.07	6.67	6.55	7.44	0.88
Physician Specialty	14.28	13.09	15.68	19.16	18.46	14.51	19.70	5.19
Mental Health Services	-			-	1.76	1.75	1.45	(0.30)
Pharmacy	26.24	29.90	24.94	26.70	30.30	42.52	45.29	2.77
Other Medical Professional	2.07	0.21	1.26	1.24	1.11	1.45	1.33	(0.12)
Other Medical Care	0.01	-	-	0.03	(0.02)	-	-	-
Other Fee For Service	17.38	16.60	14.83	13.68	20.66	21.58	23.39	1.82
Transportation	1.48	0.61	0.73	0.56	0.68	0.62	0.66	0.03
Total Claims	183.22	202.46	183.79	189.80	249.86	214.82	226.63	11.81
Medical & Care Management Expense Reinsurance	6.17	6.14	5.95 2.29	6.91	6.46	5.82 0.79	6.59	0.77 0.74
Claims Recoveries	2.30 0.87	(10.16) (3.59)	(4.65)	(12.91) (2.15)	(3.10) (1.16)	(1.41)	1.53	1.41
Sub-total	9.34	(7.61)	3.59	(8.16)	2.21	5.20	8.12	2.92
Total Cost of Health Care	205.24	208.11	200.70	195.02	264.69	232.65	247.30	14.65
Contribution Margin	31.25	29.50	28.04	35.32	36.52	37.06	28.39	8.66
General & Administrative Expenses:								
Salaries and Wages	3.75	4.13	4.74	4.92	4.68	4.34	4.62	0.27
Payroll Taxes and Benefits	0.94	1.00	1.02	1.26	1.47	0.68	1.08	0.40
Travel and Training	0.09	0.12	0.09	0.04	0.03	0.07	0.12	0.05
Outside Service - ACS	9.85	7.96	7.52	7.82	7.59	7.70	7.58	(0.12)
Outside Services - Other	0.28	0.21	0.01	0.16	0.62	1.35	0.62	(0.74)
Accounting & Actuarial Services	0.39	0.58	(0.59)	0.10	0.44	0.11	0.10	(0.01)
Legal	0.45	0.38	0.56	0.73	0.89	0.35	0.27	(80.0)
Insurance	0.10	0.10	0.11	0.11	0.08	0.09	0.08	(0.01)
Lease Expense - Office	0.24	0.19	0.23	0.22	0.22	0.22	0.29	0.07
Consulting Services	2.19	0.99	(0.14)	0.35	0.37	0.40	0.79	0.38
Translation Services	0.02	0.04	0.01	0.03	0.07	0.02	0.02	(0.00)
Advertising and Promotion	-	-	0.03	0.02	-	0.01	0.09	0.08
General Office	0.64	0.83	0.81	0.96	0.76	0.63	0.85	0.22
Depreciation & Amortization	0.05	0.06	0.06	0.06	0.06	0.05	0.25	0.20
Printing	0.05	0.22	0.17	0.02	0.08	0.01	0.11	0.11
Shipping & Postage Interest	0.01 0.31	0.09 0.90	0.11 0.37	0.00 0.16	0.11 0.15	0.04 0.11	0.03 0.08	(0.02) (0.03)
Total G & A Expenses	19.37	17.78	15.11	16.96	17.61	16.19	16.97	0.78
Net Income / (Loss)	11.88	11.72	12.93	18.36	18.91	20.86	11.42	9.44
	11.00	11.12	12.33	10.00	10.01	20.00	11.74	J.44



Note: Paid Claims Composition - reflects adjusted medical claims payment lag schedule.
\* Months Indicated with 5' represent months for which there were 5 daim payments. For all other months, 4 claim payments were made.



Note: IBNP Composition - reflects updated medical cost reserve calculation plus total system claims payable.



## For the month ended February 28, 2014

### **APPENDIX**

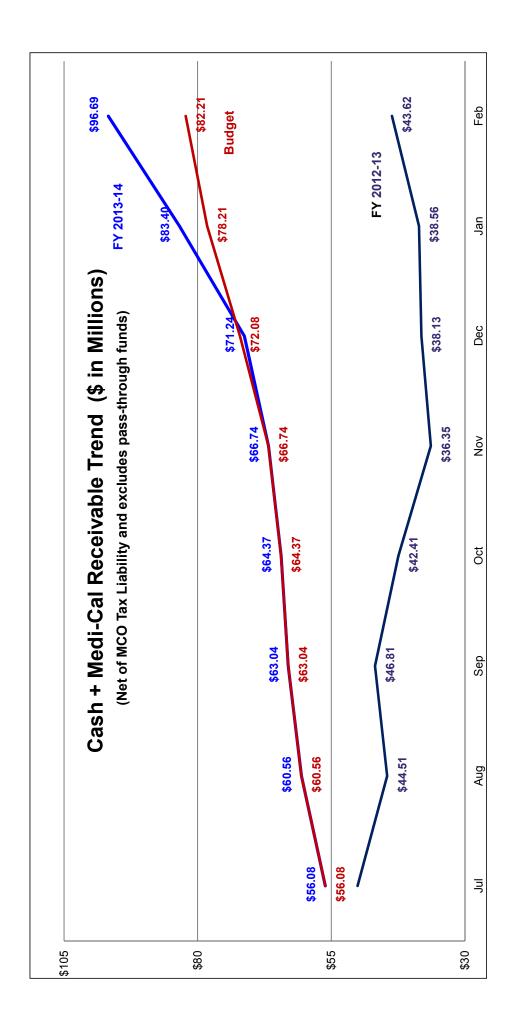
- Comparative Balance Sheet
- YTD Income Statement
- Cash & Medi-Cal Receivable Trend
- Statements of Cash Flow
- Total Expenditure Composition
- Pharmacy Cost & Utilization Trends

### **Comparative Balance Sheet**

	2/28/14	1/31/14		12/31/13	Audited FY 2012-13
ASSETS					
Current Assets					
Total Cash and Cash Equivalents	\$ 68,790,390	\$ 44,343,991	\$	41,943,461	\$ 50,817,760
Medi-Cal Receivable	52,050,271	53,691,874		42,410,897	11,683,076
Provider Receivable	425,870	440,215		800,343	1,161,379
Other Receivables	178,153	176,385		197,606	300,397
Total Accounts Receivable	52,654,294	54,308,474		43,408,847	13,144,852
Total Prepaid Accounts Total Other Current Assets	720,548	763,854		492,191	324,419
Total Current Assets  Total Current Assets	251,438 <b>122,416,670</b>	128,805 <b>99,545,124</b>		97,899 <b>85,942,398</b>	10,000 <b>64,297,030</b>
Total Fixed Assets	1,234,241	1,204,575		1,177,698	230,913
Total Assets	£ 422 650 044	\$ 100,749,699	¢	97 120 006	¢ 64 527 042
Total Assets	\$ 123,650,911	\$ 100,749,699	\$	87,120,096	\$ 64,527,943
LIABILITIES & FUND BALANCE					
Current Liabilities					
Incurred But Not Reported	\$ 53,809,826	\$ 45,833,232	\$	41,275,305	\$29,901,103
Claims Payable	6,477,413	6,198,541		5,313,850	9,748,676
Capitation Payable	1,366,703	1,320,783		1,315,435	1,002,623
Physician ACA 1202 Payable	5,271,429	5,167,335		-	-
AB85 Payable	735,137				
Accrued Premium Reduction	1,656,018	1,268,600		842,917	-
Accounts Payable	238,242	147,810		1,406,476	1,751,419
Accrued ACS	1,095,479	65,860		325,466	422,138
Accrued Expenses	1,023,244	1,056,784		745,724	477,477
Accrued Premium Tax	24,146,001	14,585,532		13,118,155	7,337,759
Accrued Interest Payable	33,466	30,714		27,670	9,712
Current Portion of Deferred Revenue	460,000	460,000		460,000	460,000
Accrued Payroll Expense	547,421	561,468		608,361	605,937
Total Current Liabilities	96,860,378	76,696,658		65,439,358	\$ 51,716,843
Long-Term Liabilities					
Deferred Revenue - Long Term Portion	613,333	651,667		690,000	920,000
Notes Payable	7,200,000	7,200,000		7,200,000	7,200,000
Total Long-Term Liabilities	7,813,333	7,851,667		7,890,000	8,120,000
Total Liabilities	104,673,711	84,548,325		73,329,358	59,836,843
Beginning Fund Balance	4,691,101	4,691,101		4,691,101	(6,031,881)
Net Income Current Year	14,286,099	11,510,274		9,099,638	10,722,981
Net income Current real	14,200,099	11,510,274		9,099,036	10,722,961
Total Fund Balance	18,977,200	16,201,375		13,790,738	4,691,100
Total Liabilities & Fund Balance	\$ 123,650,911	\$ 100,749,699	\$	87,120,096	\$64,527,943
FINANCIAL INDICATORS					
Current Ratio	1.26 : 1	1.3 : 1		1.31 : 1	1.24 : 1
Days Cash on Hand	62	37		49	58
Days Cash + State Capitation Receivable	110	84		99	72
Days Cash + State Capitation Rec (less Tax Liab)	88	70		84	63

### Income Statement For The Eight Months Ended February 28, 2014

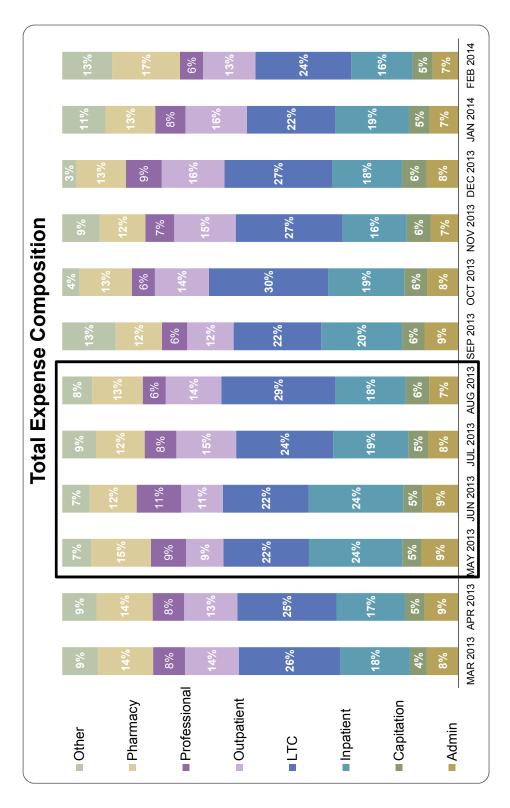
	FEB '14 Yea	ar-To-Date	Variance
	Actual	Budget	Fav/(Unfav)
Membership (includes retro members)	969,650	969,948	(298)
			<u> </u>
Revenue			
Premium	\$ 251,133,876		
Reserve for Rate Reduction	(1,656,018)	(1,334,658)	(321,360)
MCO Premium Tax	(9,525,698)	(9,553,078)	27,380
Total Net Premium	239,952,160	236,309,177	3,642,983
Other Revenue:			
Interest Income	90,476	84,128	6,347
Miscellaneous Income	305,620	306,667	(1,047)
Total Other Revenue	396,095	390,795	5,300
Total Revenue	240,348,255	236,699,972	3,648,283
Medical Expenses:			
Capitation (PCP, Specialty, Kaiser, NEMT & Vision)	12,423,889	12,462,275	38,387
FFS Claims Expenses:			
Inpatient	39,646,639	42,494,837	2,848,198
LTC/SNF	56,600,286	52,749,556	(3,850,730)
Outpatient	23,824,620	23,295,420	(529,200)
Laboratory and Radiology	1,597,802	1,716,834	119,033
Physician ACA 1202	5,271,429	-	(5,271,429)
Emergency Room	6,134,628	6,167,971	33,343
Physician Specialty	15,306,781	16,122,671	815,890
Mental Health Services	458,293	383,498	(74,795)
Pharmacy	28,910,492	30,825,664	1,915,172
Other Medical Professional	1,199,993	1,154,508	(45,485)
Other Medical Care	3,293	-	(3,293)
Other Fee For Service	15,422,634	15,474,964	52,330
Transportation	653,030	662,972	9,942
Total Claims	195,029,920	191,048,895	(3,981,025)
Medical & Care Management Expense	6,109,944	6,162,638	52,694
Reinsurance	(1,993,000)	(1,097,378)	895,622
Claims Recoveries	(2,125,088)	-	2,125,088
Sub-total	1,991,857	5,065,260	3,073,403
Total Cost of Health Care	209,445,665	208,576,431	(869,235)
Contribution Margin	30,902,590	28,123,541	2,779,049
General & Administrative Expenses:			
Salaries and Wages	4,276,050	4,309,626	33,576
Payroll Taxes and Benefits	1,022,871	1,014,381	(8,489)
Travel and Training	62,871	106,677	43,805
Outside Service - ACS	7,728,510	7,689,899	(38,611)
Outside Services - Other	403,863	306,941	(96,922)
Accounting & Actuarial Services	192,089	156,613	(35,476)
Legal	502,008	361,927	(140,081)
Insurance	94,878	91,897	(2,981)
Lease Expense - Office	217,362	229,363	12,001
Consulting Services	883,301	1,036,818	153,517
Translation Services	30,852	23,559	(7,292)
Advertising and Promotion	24,859	88,507	63,649
General Office	723,335	784,706	61,371
Depreciation & Amortization	52,038	83,449	31,411
Printing	69,735	150,030	80,294
Shipping & Postage	46,465	108,272	61,807
Interest	285,406	263,189	(22,217)
Total G & A Expenses	16,616,491	16,805,854	189,363
Net Income / (Loss)	\$ 14,286,099	\$ 11,317,688	\$ 2,968,412



		FEB '14	JAN '14	DEC '13	NOV '13	JUN'13
Cash Flow From Operating Activities						
Collected Premium	\$	48,103,931	\$ 28,969,167	\$ 28,079,945	\$ 27,862,839	\$ 52,138,834
Miscellaneous Income		14,273	11,688	12,031	8,658	8,594
State Pass Through Funds			50,070		5,691,714	34,346,474
Paid Claims					-	
Medical & Hospital Expenses		(15,766,152)	(15,055,874)	(17,202,587)	(17,387,071)	(17,277,826)
Pharmacy		(4,420,992)	(5,426,411)	(1,690,164)	(3,787,143)	(4,009,168)
Capitation		(1,601,382)	(1,685,367)	(1,625,829)	(1,521,485)	(1,162,302)
Reinsurance of Claims		(308,946)	(278,035)	(278,975)	(277,386)	(240,430)
State Pass Through Funds Distributed				(5,691,714)	-	(34,346,474)
Paid Administration		(1,509,345)	(4,122,509)	(2,610,933)	(2,494,333)	(2,616,623)
MCO Tax Received / (Paid)		-	-		-	829,564
Net Cash Provided/ (Used) by Operating Activities		24,511,385	2,462,729	(1,008,225)	8,095,794	27,670,643
Cash Flow From Investing/Financing Activities					-	
Proceeds from Line of Credit					-	-
Repayments on Line of Credit		-	_	-	-	-
Net Acquisition of Property/Equipment		(64,987)	(62,198)	(39,754)	(169,050)	(31,026)
Net Cash Provided/(Used) by Investing/Financing		(64,987)	(62,198)	(39,754)	(169,050)	(31,026)
Net Cash Flow	\$	24,446,398	\$ 2,400,530	\$ (1,047,979)	\$ 7,926,744	\$ 27,639,617
Cash and Cash Equivalents (Beg. of Period)		44,343,991	41,943,461	42,991,440	35,064,697	23,068,235
Cash and Cash Equivalents (End of Period)		68,790,390	44,343,991	41,943,461	42,991,440	50,817,760
	\$	24,446,398	\$ 2,400,530	\$ (1,047,979)	\$ 7,926,744	\$ 27,749,525
Adjustment to Reconcile Net Income to Net Cash F	lov					
Net (Loss) Income		2,775,825	2,410,637	2,208,708	1,568,798	4,109,976
Depreciation & Amortization		35,321	35,321	34,547	7,015	11,407
Decrease/(Increase) in Receivables		1,654,180	(10,899,627)	(874,196)	(1,544,001)	22,788,941
Decrease/(Increase) in Prepaids & Other Current Ass		(79,327)	(302,569)	851,572	(104,858)	769,972
(Decrease)/Increase in Payables		2,301,865	4,341,958	(6,376,146)	5,901,351	(1,578,838)
(Decrease)/Increase in Other Liabilities		(38,333)	(38,333)	(38,333)	(38,333)	(121,667)
Change in MCO Tax Liability		9,560,469	1,467,377	1,110,666	1,114,454	1,433,012
Changes in Claims and Capitation Payable		324,792	890,038	(507,606)	(812,202)	1,913,029
Changes in IBNR		7,976,594	4,557,927	2,582,563	2,003,570	(1,655,189)
		24,511,385	2,462,729	(1,008,225)	8,095,794	27,670,643
Net Cash Flow from Operating Activities	\$	24,511,385	\$ 2,462,729	\$ (1,008,225)	\$ 8,095,794	\$ 27,670,643

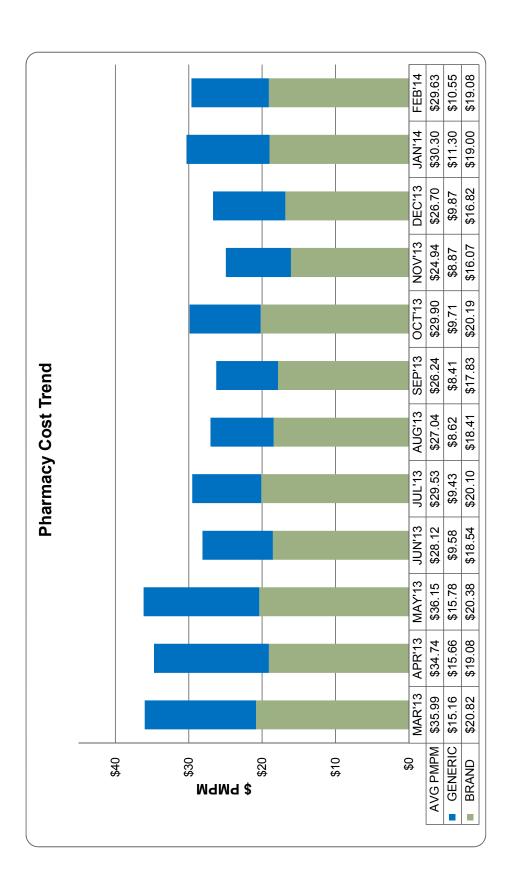
### **Statement of Cash Flows - YTD**

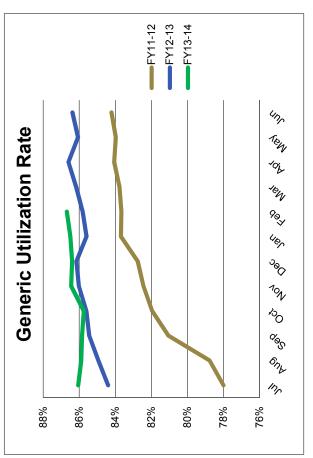
	F-1- 2014 VTD
Cook Flow From Operating Activities	Feb 2014 YTD
Cash Flow From Operating Activities	£ 040 004 000
Collected Premium	\$ 219,024,883
Miscellaneous Income	90,476
State Pass Through Funds	61,173,953
Paid Claims	
Paid Claims  Medical & Hospital Expenses	(125 644 555)
Pharmacy	(135,644,555) (28,947,524)
Capitation	(12,037,480)
Reinsurance of Claims	(2,220,531)
State Pass Through Funds Distributed	(59,959,855)
Payment of Withhold / Risk Sharing Incentive	(39,939,633)
Paid Administration	(21 5/1 916)
Repay Initial Net Liabilities	(21,541,816)
MCO Taxes Received / (Paid)	(826 566)
Net Cash Provided/(Used) by Operating Activities	(826,566) <b>19,110,985</b>
Net Cash Provided/(Osed) by Operating Activities	19,110,905
Cash Flow From Investing/Financing Activities	
Proceeds from Line of Credit	
Repayments on Line of Credit	_
Net Acquisition of Property/Equipment	- (1 138 355)
Net Cash Provided/(Used) by Investing/Financing	(1,138,355) (1,138,355)
Net Cash Frovided/(Osed) by investing/i mancing	(1,130,355)
Net Cash Flow	\$ 17,972,630
	Ţ 11,012,000
Cash and Cash Equivalents (Beg. of Period)	50,817,760
Cash and Cash Equivalents (End of Period)	68,790,390
4	\$ 17,972,630
Adjustment to Reconcile Net Income to Net	
Cash Flow	
Net Income/(Loss)	14,286,099
Depreciation & Amortization	136,182
Decrease/(Increase) in Receivables	(39,509,442)
Decrease/(Increase) in Prepaids & Other Current Assets	
(Decrease)/Increase in Payables	7,333,754
(Decrease)/Increase in Other Liabilities	(307,821)
Change in MCO Tax Liability	16,808,241
Changes in Claims and Capitation Payable	(2,907,184)
Changes in IBNR	23,908,723
	19,110,985
	,
Net Cash Flow from Operating Activities	\$ 19,110,985

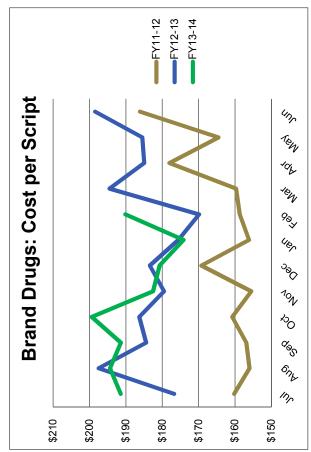


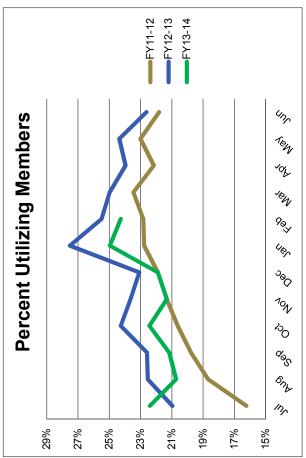
have been made with the assumption of the TLIC population and its affect on various categories of service. Therefore, the months of Mayallocation methodology. The methodology was updated to utilize payment information by different categories of services. Further changes In May 2013, GCHP changed its method of distributing Health Care Costs (HCC) across categories of service. Prior months utilized an August represent the transitioning to a new methodology.

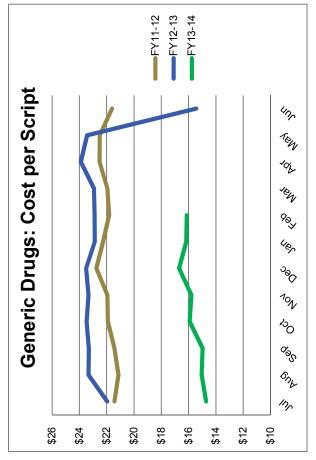
Beginning January 2014, "Other" category includes ACA 1202 physician supplement and mental health expenses.















# Gold Coast Health Plan

April 3, 2014

Executive / Finance Committee Meeting

Michelle Raleigh, CFO



Background

Recommendations & Observations Plan's status update on Auditor's

Next Steps





# Background

- LLP (McGladrey), recommendations were made as part of As part of the FY 2012-13 audit performed by McGladrey their report to the Executive/Finance Committee:
- Letter communicating deficiencies in internal controls in financial reporting
- Material Weaknesses (none)
- Significant Deficiencies
- Letter communicating comments, observations and suggestions
- This report provides an update on the Plan's progress and future steps on these recommendations





# AUDITOR'S LETTER RE: CONTROLS

GCHP Update	<ul> <li>a. GCHP audits the third-party vendors as follows:</li> <li>a. GCHP audits wendor ACS (a division of Xerox) by performing:</li> <li>a. A post-payment audit of all claims that were included in the 2% random sample audit that ACS preforms on processed claims.</li> <li>a A pre-payment audit of all claims with a payable amount greater than \$25,000. As of December 4, 2013, GCHP has updated the criteria to include all claims with a payable amount greater than \$10,000.</li> <li>Focused audits, as needed, are done based on trends resulting from routine audit results and adjustments.</li> <li>b. GCHP audits the PBM vendor (Script Care, LTD.) by performing:</li> <li>b. GCHP audits of all denied and 10% of approved prior authorizations from the prior day.</li> <li>Monthly and quarterly random audits of pharmacy claims to ensure proper formulary processing.</li> <li>Note – pharmacy claims processed by Script Care will be audited for contract performance by an independent vendor by June 30, 2014.</li> </ul>
Summary of McGladrey's Recommendation	Management should continue to perform audits on the procedures performed by third-party vendors who process claims information.
McGladrey Recognized Significant Deficiencies	Claims



GCHP Update	<ol> <li>GCHP acknowledges the need for a SOC 1 report from ACS and has defined the process and timing. The SOC 1 report is expected to be completed in the first half of FY 2014-15.</li> </ol>	3. GCHP's Director of Operations is working with ACS to:	<ul> <li>Formulate a process to validate the accuracy of provider contract and fee schedules in GCHP's core system after they have been uploaded.</li> </ul>	<ul> <li>Review all activities related to the claims processing function [claims production, adjustments, quality assurance, configuration, refunds, etc. This is one of the topics covered during a standing meeting between ACS and GCHP staff.]</li> </ul>
Summary of McGladrey's Recommendation	<ol> <li>Consider performing an audit, similar to a Service Organization Controls (SOC 1) report.</li> </ol>	<ol><li>Review ongoing processing policies and controls by:</li></ol>	<ul> <li>a. Implementing formal review process of provider contracts/fee schedules</li> </ul>	<ul><li>b. Continue to review processes to ensure claim payment accuracy</li></ul>
McGladrey Recognized Significant Deficiencies	Claims Processing (Continued)			

Gold Coast Health Plan	GCHP Update	<ul> <li>a. GCHP has implemented an internal change management policy for Plan-supported production systems. Production changes are tracked in the Connectwise helpdesk ticketing system. Examples of production changes include security patches and server configuration changes. As GCHP introduces new systems into the production environment, they will fall under the GCHP change management policy.</li> <li>b. Several controls were implemented in fiscal FY 2012-13 including review of ACS's processes and increased auto-adjudication rate (i.e., auto adjudication increased from 33.78% to 60.44% between June 30 2012 and June 30, 2013).</li> <li>Additionally, ACS follows a formal change management process to assure modifications are reviewed by designated employees before entered into production. Production changes are tracked in a ticketing system called "Service Center." The Plan has obtained and reviewed ACS's policies for change management.</li> <li>5. GCHP calculates IBNP estimates monthly. The Plan is evaluating the recommendation to include estimates of reinsurance recoveries within the IBNP estimate. It should be noted that the current methodology conservatively states IBNP. Also, the Plan's financial statements will reflect reinsurance recoveries of high dollar claims once payments are received from reinsurance vendor. In addition, GCHP had their actuaries (Milliman) separately calculate an the IBNP estimate.</li> </ul>
	Summary of McGladrey's Recommendation	Review ongoing processing policies and controls by:     a. Continue to monitor IT change management policies policies and procedures regarding claims processing and IT controls      Monitor incurred but not paid (IBNP) levels monthly and incorporate estimates of reinsurance recoveries.
	McGladrey Recognized Significant Deficiencies	Claims Processing (Continued)



GCHP Update	6. As GCHP updates financial projections, the Plan will continue to perform on-going evaluations regarding the need for a premium deficiency reserve. This will formally be evaluated prior to end of the fiscal year, as part of the next year's budget process.	7. GCHP has hired a Controller and two highly qualified accountants which are allowing the Plan to implement appropriate segregation of duties and reconcile accounts monthly. The Plan is also in the process of adding a third accountant position. A Director of Financial Analysis position has been created and filled, and two additional positions providing analysis on health care expenses are in the process of being filled.	8. As staff has been hired, additional documentation on procedures and peer review has improved. New procedures have been adopted and will continue to be augmented to support appropriate documentation of peer review.
Summary of McGladrey's Recommendation	6. Evaluate need for premium deficiency reserves	<ol> <li>Hire staff to achieve proper segregation of duties and perform monthly reconciliations</li> </ol>	<ol> <li>Review procedures to ensure proper peer review and documentation</li> </ol>
McGladrey Recognized Significant Deficiencies	Claims Reserve	Segregation of Duties -	



GCHP Update	<ol> <li>After a thorough review of the payroll super-users it was determined that all super- users are appropriate.</li> </ol>	10. In June 2013, a process was implemented by human resource staff to review all changes made at every payroll cycle.	11. Currently, GCHP finance and human resource staff are updating processes to ensure peer review of all payroll changes, including those done by super-users.	12. As of May 1, 2013, GCHP has implemented a policy for User Access Requests to track approvals and authorizations for permitting new hires and removing terminations from logical and physical access to information resources, and recommended the procedures be consistently followed to ensure access is granted/termed in a timely manner. User access requests are captured and tracked in the Connectwise ticketing system.
Summary of McGladrey's Recommendation	<ol> <li>Review super-users and limit as appropriate</li> </ol>	<ol> <li>Monitor supervisory approvals of payroll changes</li> </ol>	11. Implement a process to review changes made by super-user	<ol> <li>Implement and monitor a formal review procedure of user accounts with network access and Multiview access</li> </ol>
McGladrey Recognized Significant Deficiencies	Segregation of Duties - Payroll			Segregation of Duties – IT



GCHP Update	<ul> <li>The Plan has performed the following regarding reducing conflicting duties: <ul> <li>A network user account clean-up was done in January 2013 and again in July 2013 as part of the GCHP active directory reconfiguration. As part of standard operating procedures, when a GCHP network Windows account is disabled, access to Multiview and Go-to-My-PC is subsequently restricted as the user no longer has access to the GCHP network. Go-to-My PC access will be replaced with a secure VPN remote access solution was implemented, which includes an annual review of remote user accounts.</li> <li>When an employee resigns/is termed, the employee's manager or human resources will complete and submit a user access form with all term details. This creates a ticket to the GCHP IT helpdesk ticket system – Connectwise.</li> <li>The ticket is closed once user account access is termed. In standard situations, human resources or management should submit term notices at least 5 days prior to employee leaving the Plan.</li> </ul> </li> </ul>	A review of provider receivable reports supplied by ACS Recoveries was completed. Standard, ongoing reports are utilized as part of the calculation of the provider receivable.  Accounts are reviewed monthly and a formulaic allowance is applied to aged balances. On an ongoing basis, GCHP is reviewing the methodology to determine what additional enhancements are appropriate
	<ul> <li>13. The Plan h</li> <li>A netw</li> <li>2013 as operating access longer less an ann</li> <li>When a secont resoure This or The tick situation least 5</li> </ul>	14. A review completed provider responder resp
Summary of McGladrey's Recommendation	13. Continue to eliminate conflicting duties through IT controls and segregation of duties	<ul><li>14. Enhance reporting of provider accounts receivable</li><li>15. Review accounts monthly and assess collectability</li></ul>
McGladrey Recognized Significant Deficiencies	Segregation of Duties – IT	Accounts Receivable Reconciliations and Allowances



# **AUDITOR'S LETTER RE: RECOMMENDATIONS**

GCHP Update	As the Plan staffs appropriately, policies and controls will be finalized. At that time, GCHP will evaluate what types of internal and/or external resources should be dedicated to perform various internal audit functions.	GCHP has hired a permanent Chief Operating Officer and Director of Operations to manage the key professional services vendors, including ACS. The Plan concurs that contract language needs to be clarified regarding responsibility of processing run-out claims upon termination or expiration of the ACS contract. Currently, draft language has been proposed by ACS and is under review. These contracts are expected to be amended by June 30, 2014.
Summary of McGladrey's Recommendation	Begin developing a department that can effectively execute the functions of an internal audit department to analyze, recommend and provide risk mitigation suggestions.	Revise contracts to include specific language to clarify liability
McGladrey Recommendation	Internal Audit Function	Professional Services Provider Contracts



# Next Steps

actively resolve outstanding findings Plan management will continue to

the Executive / Finance Committee; the Plan will provide quarterly updates to next update will be after the Plan has **closed FY 2013-14**  Donald B. Gilbert Michael R. Robson Trent E. Smith Alan L. Edelstein OF COUNSEL

### GOLD COAST HEALTH PLAN LEGISLATIVE REPORT

By Don Gilbert and Trent Smith March 26, 2014

Several hundred bills were introduced in the last few days before the February 21st deadline to introduce new bills. We have been sifting through all of the new bills to identify those that may be of interest to Gold Coast. While there were dozens of bills focused on health care and health care coverage, many new bills take aim at making changes to Covered California or impact only commercial health plans. However, we have identified several bills that may be of interest to Gold Coast.

Two bills were introduced to increased Medi-Cal provider rates. AB 1759 by Assemblyman Pan, Chairman of the Assembly Health Committee, would tie primary care provider rates to the Medicare rate. Under current law these rates are already linked, but the law is set to expire at the end of the year. AB 1759 would remove the sunset provision in law and continue the rate linkage going forward.

AB 1805 by Assemblywoman Skinner, Chairwoman of the Assembly Appropriations Committee, would eliminate the 10 percent provider cuts for all Medi-Cal providers. Both AB 1759 and AB 1805 will have strong support in the Legislature and will be the focus of extensive debate in policy committees. However, as we have reported in the past, Governor Brown has remained committed to keeping Medi-Cal rates at their current levels. Any chance of a compromise on Medi-Cal rates will have to come in the budget negotiations rather than in a policy bill. This is because the Governor can veto any bill he does not like, whereas in the budget process the Legislature can "bundle" in the budget bill or trailer bills its priorities along with those of the Governor.

Another bill that may be of interest to Gold Coast is SB 1081 by Senator Hernandez, Chairman of the Senate Health Committee. This measure proposes reforming the payment method for Federally Qualified Health Clinics (FQHC). Currently, FQHC's receive a federally mandated per patient per visit rate. Managed care plans can negotiate a capitated rate for these clinics, but the clinics receive a balance of their payment – the wrap around payment – directly from the state.

While FQHC's receive the health plan portion of their payment in a timely manner, the state payment is often delayed. This dual payment process can cause cash flow problems for the clinics. In addition, this problem will only become worse with the growing Medi-Cal population that FQHC's will serve in the future. Senator Hernandez wants to keep the FQHC's viable, as he sees them as a key health care provider.

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The problem is that the Department of Health Care Services (DHCS) wants the health plans to assume more risk and more administrative responsibility without the guarantee of increased rates. Even with better rates from the state, many plans believe the administrative burdens would be too cumbersome. In addition, health plans would not be able to manage the care delivery in the same manner as other providers because FQHC's have their rates determined by federal law. We expect that there will be several amendments to SB 1081 as it is debated extensively throughout the legislative process.

We are also keeping a close eye on SB 964 by Senator Hernandez, which would require Knox-Keene licensed health plans that have multiple lines of business, including Medi-Cal, to provide more detailed network adequacy surveys. While the bill does not technically apply to Gold Coast at this point, there have been rumors that it could be amended to require County Organized Health Systems, like Gold Coast, to obtain a Knox-Keene license from the Department of Managed Health Care (DMHC).

SB 1452 by Senator Wolk would allow a Medi-Cal beneficiary for whom a conservator has been appointed under the Lanterman-Petris-Short (LPS) Act to be exempt from mandatory enrollment in Medi-Cal managed care. People conserved by a court under the LPS Act are mentally ill and unable to care for themselves. Because there is a shortage of mental health facilities in many parts of the state that can care for these individuals, many conservatees have to be placed in facilities in other counties. Such arrangements can be burdensome for public guardians who are responsible for the mental and physical health care of the conservatee because many providers outside of Orange County do not recognize Gold Coast and will not provide care without assurances of health care coverage. Ultimately, a process is needed to allow public conservators and health plans to better coordinate care.

Many bills were introduced to restore or enhance Medi-Cal benefits. AB 1552 by Assemblywoman Lowenthal would make Community Based Adult Services (CBAS) a Medi-Cal benefit. AB 1868 by Assemblyman Gomez would restore Medi-Cal podiatric services, while SB 1374 by Senator Hernandez intends to establish a new Medi-Cal rate for ambulance services. Like the bills intended to restore Medi-Cal provider rates, the subject matter in these bills will likely be resolved in budget debates rather than policy bills.

In addition to our work on legislation, we continue to oppose the Governor's budget proposal to establish a statewide drug formulary. As we wrote last month, DHCS would like to establish a statewide drug formulary so that they can negotiate with drug manufacturers to place certain brand name drugs on the formulary in exchange for significant rebates. This proposal would lead to higher pharmacy costs for health plans

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like Gold Coast, which would eventually result in Gold Coast seeking higher reimbursement rates from the state.

The proposal received its first hearing in the Senate Budget Subcommittee, where DHCS vigorously defended the concept. However, there was a lot of opposition, including some very disparaging remarks from the non-partisan independent Legislative Analyst Office (LAO). While the LAO stopped short of opposing, claiming they were still analyzing the proposal, they spent a lot of time testifying against the plan. The committee did not vote on the proposal, but will likely wait until after the May Revise.