

**HFS****Illinois Department of  
Healthcare and Family Services**

JB Pritzker, Governor

Theresa A. Eagleson, Director

201 South Grand Avenue East, Springfield, Illinois 62763

Telephone: +1 217-782-1200, TTY: +1 800-526-5812



June 5, 2023

Rushil Desai, CEO  
Aetna Better Health**RE: Aetna HCI - Q1 CY2023 HSW Report Category Sanction Notice**

Dear Mr. Desai:

This letter serves as notification to Aetna Better Health (Aetna) of sanction pursuant to Section 7.16.17 Other Failures of the HealthChoice Illinois (HCI) Contract for Furnishing Health Services by a Managed Care Organization (2018-24-001), between Aetna and the Illinois Department of HealthCare and Family Services (Department), for failure to meet the Quarter 1 (Q1) Calendar Year (CY) 2023 Health, Safety and Welfare (HSW) report categories as follows:

HCI Contract Section(s) or HFS MCO Policy	Requirement Violation	# of violations	Per violation Sanction amount	Total Sanction Amount
5.2.1.2	Failure to provide HCBS services (Service Package II) during the evaluation period: Contractor shall provide, or arrange for the provision of, all Covered Services for Service Package II, to Enrollees at all times during the term of this Contract.	2	\$25,000	\$50,000
5.13.2.2 - HRA 5.15.1 - IPOC/Service Plan	Failure to complete timely an initial HRA or Care Plan (IPOC/Service Plan) for waiver members who are current enrollees or who are transitioning or have transitioned (were enrolled in another MCO or fee-for-service): <u>Health Risk Assessment</u> (HRA) - Enrollees receiving HCBS Waiver services or residing in NFs as of their Effective Enrollment Date with Contractor. The health-risk assessment must be in-person and completed within (90) days after enrollment. <u>Care Plan (IPOC/Service Plan)</u> -	1	\$15,000	\$15,000



	Contractor shall develop a comprehensive, person-centered IPOC for Enrollees stratified as Level 3 (high-risk) or Level 2 (moderate risk), Enrollees residing in a Nursing Facility, and Enrollees receiving HCBS Waiver services within ninety (90) days after enrollment.			
5.13.2.4 - HRA 5.15.1.5.1 - IPOC/Service Plan	Failure to complete timely an initial HRA or Care Plan (IPOC/Service Plan), after MCO is notified of enrollee's newly eligible status for HCBS waiver: <u>Health Risk Assessment</u> - Enrollees deemed newly eligible for HCBS Waiver services. The health-risk assessment must be in-person and completed within fifteen (15) days after Contractor is notified that the Enrollee is determined eligible for HCBS Waiver services. <u>Service Plan</u> - Contractor shall ensure that the person-centered planning process is initiated and the service plan is developed within fifteen (15) days after Contractor is notified that the Enrollee is determined eligible for HCBS Waiver services.	1	\$25,000	\$25,000
5.15.1.5.1.4	Failure to complete timely an annual IPOC/Service Plan: Contractor shall ensure that an Enrollee's person-centered service plan is reviewed and revised upon reassessment of functional need at least every twelve (12) months, when an Enrollee's circumstances or needs change significantly, or at the Enrollee's request.	4	\$15,000	\$60,000
5.23.1, 5.23.1.11, 5.23.2.1, 5.23.2.3	Failure to comply with HSW monitoring/failure to follow critical incident reporting and protocol.	1	\$25,000	\$25,000



5.17.3- 5.17.3.5, Waiver Performance Measures Attachment XI, Table 2	Lack of Enrollee Contact as per contractual contact standards	9	\$10,000	\$90,000
<b>Totals</b>		<b>18</b>		<b>\$265,000</b>

Aetna failed to meet the HSW categories listed above for the Q1 CY2023 HSW report. As such, the Department is sanctioning Aetna \$265,0000. Aetna is to issue a check payable to the Department of Healthcare and Family Services for \$265,000, and shall submit that check to the contact and address listed no later than Friday, June 30, 2023. In the memo section of the check, please indicate "Aetna HCI Q1 CY2023 HSW Report Category Sanction".

Department of Healthcare and Family Services  
Bureau of Fiscal Operations, Attn: Donavon Patton  
2200 Churchill Road, Building A2  
Springfield, IL 62702

If you have any questions regarding this information, please contact your HFS Account Manager, Lauren Polite at [Lauren.Polite@illinois.gov](mailto:Lauren.Polite@illinois.gov).

Sincerely,

Robert Mendonsa, Deputy Administrator  
Division of Medical Programs

cc: Melanie Fernando, Dianne Robinson, Laura Ray, Brenda Vilayhong, Keshonna Lones, Lauren Polite, Amy Roberts, Dennise Parker, April OShea, Donavon Patton, Kimberley Cox, and Joe Merwin