



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

JB Pritzker, Governor  
Elizabeth M. Whitehorn, Director

201 South Grand Avenue East, Springfield, Illinois 62763  
Telephone: +1 217-782-1200, TTY: +1 800-526-5812



January 15, 2025

Nancy Wohlhart, CEO  
Blue Cross Community Health Plans

**RE: HCI EUM 2024 Eval 4 \$100,000 Financial Penalty**

Dear Ms. Wohlhart:

This letter serves as notification to Blue Cross Community Health Plans (“Blue Cross”) of sanction pursuant to Section 7.16.6 of the Contract for Furnishing Health Services by a Managed Care Organization (“contract”) between the Department of Healthcare and Family Services (“Department”) and Blue Cross:

**7.16. Failure to submit Encounter Data.** The Department and Contractor acknowledge and agree that they will work in good faith to implement mutually agreed-upon system requirements resulting in the complete and comprehensive transfer and acceptance of Encounter Data, and that such mutual agreement shall not be unreasonably withheld. Contractor shall submit complete and accurate data quarterly to the Department in accordance with the Illinois Medicaid Health Plan Encounter Utilization Monitoring (EUM) requirements document, as set forth in Attachment XXIII, for each evaluation period. If Contractor does not meet the standards by the evaluation date as set forth in Attachment XXIII, the Department, without further notice, may:

7.16.6.1 impose a monetary penalty of up to US \$100,000;

7.16.6.1.1 impose a monetary penalty of up to US \$100,000 for each unmet standard, beginning with the calendar year 2022 third quarter EUM data;

7.16.6.2 impose an enrollment hold on Contractor; or

7.16.6.3 impose both.

Blue Cross’s HealthChoice Illinois (HCI) Encounter Summary report for EUM 2024 Evaluation Period 4 Subcategory score for Transportation, 90.9%, is below the 92% threshold related to the \$100,000 Financial Penalty outlined in Attachment XIII. The Department is hereby providing written notice that Blue Cross failed to meet the established expectation and is therefore fining Blue Cross in the amount of \$100,000. Blue Cross is to issue an electronic payment to the Department, by either ACH or Wire Transfer, no later than Friday, February 21, 2025. The electronic payment shall include the following fields for payment identification and tracking purposes by the Department:

ORIG CO NAME: Health Care Service Corp  
ORIG ID: [REDACTED]

ENTRY DESCR: this is to be left blank  
ENTRY CLASS: *CCD*  
TRACE NO: *Bank Information*  
ENTRY DATE: *yymmdd*  
IND ID NO: *Bank Information*  
IND NAME: **Health Care Service Corp**  
REMARK: **EUM 2024 Eval 4**  
ORIG BANK: *Bank Name*

\*The information highlighted in yellow is specific to the Department and payment detail requirements, and shall not be changed or modified by the MCO.

\*The information in gray is the banking information.

If you have any questions regarding this information, please contact Devang Ghadia at 217-524-2502.

Sincerely,

Helena Lefkow, Deputy Administrator, Managed Care Performance  
Division of Medical Programs

cc: Courtney Boileau, Caitlin Hutchison, Lilia Velazquez, Keshonna Lones, Leigh Anne Ochs, Stephanie Hunter, Rich Allen, Amy Roberts, Devang Ghadia, and Joe Merwin