

**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

Nancy Wohlgart, CEO
Blue Cross Community Health Plans**RE: Blue Cross HCI - Q1 CY2023 HSW Report Category Sanction Notice**

Dear Ms. Wohlgart:

This letter serves as notification to Blue Cross Community Health Plans (Blue Cross) 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 Blue Cross 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.	1	\$25,000	\$25,000
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.	3	\$25,000	\$75,000
5.17.3- 5.17.3.5, Waiver Performance Measures Attachment XI, Table 2	Lack of Enrollee Contact as per contractual contact standards	3	\$10,000	\$30,000
Totals		8		\$145,000

Blue Cross failed to meet the HSW categories listed above for the Q1 CY2023 HSW report. As such, the Department is sanctioning Blue Cross \$145,000. Blue Cross is to issue a check payable to the Department of Healthcare and Family Services for \$145,000, 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 "Blue Cross 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 .

Sincerely,

Robert Mendonsa, Deputy Administrator
Division of Medical Programs

cc: Courtney Boileau, Caitlin Hutchinson, Laura Ray, Brenda Vilayhong, Keshonna Lones, Lauren Polite, Amy Roberts, Dennise Parker, April OShea, Donavon Patton, Kimberley Cox, and Joe Merwin