



HFS

**Illinois Department of
Healthcare and Family Services**

JB Pritzker, Governor
Elizabeth M. Whitehorn, Director

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September 22, 2025

Stephen Harris, CEO
Blue Cross Blue Shield MMAI Health Plans

RE: BCBS MMAI Payment Instructions Non-Compliance Sanction

Dear Mr. Harris:

This letter serves as written notification to Blue Cross Blue Shield MMAI Health Plan ("Blue Cross") of sanction pursuant to Section 5.3.14.1.11 of the Contract for the Medicare and Medicaid Alignment Initiative between the Department of Health and Human Services, acting by and through the Centers for Medicare & Medicaid Services (CMS), the State of Illinois, acting by and through the Department of Healthcare and Family Services (Department) and Blue Cross.

On August 28, 2025, Blue Cross failed to comply with the Department's ACH payment instructions as it pertains to the "Remark" field, which is used to identify how the payment is to be applied. Per Blue Cross's email on September 3, 2025, titled "BCBS ACH Payment" the ACH draft in violation was- IND ID No. 23348809 – MMAI Care Gap Plan PPs Sanction. As such, the Department is sanctioning Blue Cross \$5,000 for ACH payment instructions non-compliance. Blue Cross is to issue an electronic payment to the Department, by either ACH or Wire Transfer, no later than Friday, October 17, 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: **MMAI ACH Remark**
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 notification, please contact your HFS Account Management team Keshonna Lones at Keshonna.Lones@illinois.gov, or Stephanie Hunter at Stephanie.Hunter2@illinois.gov.

Sincerely,

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

cc: Dana Mott, Adam Eifler, Tamara Valdez, Amy Roberts, Keshonna Lones, Rich Allen, Leigh Anne Ochs, Stephanie Hunter, Adam Lewis, and Joe Merwin