

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

JB Pritzker, Governor

Theresa A. Eagleson, Director

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November 28, 2023

Jeb Duke

Humana MMAI

**RE: MMAI IL 3.6 Performance Metric Validation Ad-Hoc Report Sanction**

Dear Mr. Duke:

This letter serves as notification to Humana MMAI Health Plan ("Humana MMAI") of sanction pursuant to Section 5.3.14 of the Contract for the Medicare and Medicaid Alignment Initiative ("MMAI Contract") 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 Humana MMAI:

**5.3.14 Intermediate Sanctions and Civil Monetary Penalties**

- 5.3.14.1 In addition to termination under Section 5.5, CMS and the Department may impose any or all of the sanctions in Section 5.3.14.2 upon any of the events below; provided, however, that CMS and the Department will only impose those sanctions they determine to be reasonable and appropriate for the specific violations identified. Sanctions may be imposed in accordance with regulations that are current at the time of the sanction. Sanctions may be imposed in accordance with this section if the Contractor:

5.3.14.1.11 Fails to comply with reporting requirements;

5.3.14.1.12 Fails to submit complete and usable encounter data

Pursuant to the Department's ad-hoc Performance Metric Validation (PMV) data request for metric IL 3.6, issued to Humana via on August 28, 2023, at 2:24 p.m., under the email title of "MMAI CY2022 Performance Measure Validation IL 3.6", Humana failed to submit data sets that were checked for quality or accuracy. Humana's data submission to the ad-hoc report request included enrollee-level data files that did not meet the technical reporting requirements. Therefore, the Department is sanctioning Humana \$5,000.00. Humana is to issue a check payable to the Department of Healthcare and Family Services for \$5,000 and shall submit that check to the contact and address listed no later than Friday, December 29, 2023. In the memo section of the check, please indicate "Humana IL 3.6 PMV Ad-Hoc Report 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 Keshonna Lones at Keshonna.Lones@illinois.gov.

Sincerely,

Laura Ray, Interim Deputy Administrator  
Division of Medical Programs

cc: Kevin Sebaski, Daniel Taetzsch, Amy Roberts, Dennise Parker, April OShea, Donavon Patton, Lauren Polite, Keshonna Lones, Brenda Vilayhong, and Joe Merwin