Rosmond Dolen, JD
Director of Regulatory Affairs

Thomas McMahan
Executive Director, Medicaid Oversight Branch
Department of Medicaid Services
275 E. Main
Frankfort, Kentucky 40621

April 3, 2014

RE: ID # WC2014PN-1

Dear Mr. McMahan:

On behalf of WellCare of Kentucky, Inc., ("WellCare"), I am responding to your letter dated March 11, 2014 which indicated WellCare was not in substantial compliance with section 28.10 Provider Electronic Transmission of Data. A response was submitted via certified mail on March 21, 2014. However, based on your email dated March 31, 2014 we understand additional information is needed.

WellCare would like to provide the following information in addition to that contained within our previous letter:

The CAP Request dated March 11, 2014 was not directed at WellCare's Network adequacy

WellCare acknowledges, and the Department recognized, that the adequacy of its provider network is not at issue in your letter. The issue noted is that the WellCare network file did not conform to appropriate formatting requirements. Leading zeroes were omitted from the file which resulted in an inaccurate representation of participating hospitals within our network.

Corrective Action has already taken place

WellCare first became aware of an issue with the Provider Network File in December 2013. At that time, WellCare immediately initiated remedial action to address the deficiency referenced within your letter dated March 11, 2014. These corrective actions were completed prior to the receipt of your request.

Attached please find a detailed account of the corrective actions previously taken to address this issue. In addition, WellCare has confirmed that the following submissions of the Provider Network File were successfully transmitted and received to the Department on the dates indicated below:

- February 12, 2014
- February 26, 2014
- March 12, 2014
- March 26, 2014

Office Address: One Triton Office Place, 13551 Triton Park Boulevard, Suite 1800, Louisville, KY 40223
Mailing Address: One Triton Office Place,13551 Triton Park Boulevard, Suite 1800, Louisville, KY 40223
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At this time, WellCare is unaware of any further errors preventing acceptance of the Provider Network file by the Department.

Conclusion

We appreciate the opportunity to respond and want to assure the Department that these matters are taken very seriously. Thank you for your extension to allow us the opportunity to fully respond to your request. Please contact me if you have any further questions.

Sincerely,

Rosmond Dolen, JD

Cc: Kelly Munson, State President Kentucky
Lawrence Kissner, Commissioner, Department of Medicaid Services
Christina Heavrin, General Counsel, Cabinet for Health and Family Services
Lee A. Guice, Director of Policy and Operations, Department for Medicaid Services
Jeff Mosely, General Counsel, Cabinet for Finance and Administration
Cindy Arflack, Staff Liaison, Department for Medicaid Services

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WellCare

WC2014PN-1
Received: March 13, 2014

Deviation: 1	*Failure to submit accurate Provider Network Files due to Formatting Issues. Hospitals not Accurately Reflected due to Omission of Leading Zeroes.*	Repeat Deficiency? No

Step Actions:		Step Action	Complete?	Target Completion Date or Actual Completion Date	Responsible Department
	1	*Review file specifications set forth within Section 28.10 and Exhibit G of the DMS contract with internal IT team*	*Yes*	*Dec-13*	*Regulatory Affairs; Operations; IT*
	2	*Review DMS submission guidelines and research report logic with internal IT team.*	*Yes*	*Dec-13*	*Regulatory Affairs; Operations; IT*
	3	*Root cause analysis determined that IT program erroneously removed the "0" from the hosptial provider type ("01") which led to the omission of hospitals within the report.*	*Yes*	*Jan-14*	*Regulatory Affiairs, Operations, IT*
	4	*Reporting logic was updataded to reflect correct hospital provider type "01" and internal quality assurance testing completed.*	*Yes*	*Jan-14*	*Regulatory Affairs; Operations: IT*
	5	*Confirmed accurate transmission of the Provider Network File to DMS however the January 29th submission was rejected for failure to meet timely filing requirements. The file was submitted under Central Timezone rather than Eastern.*	*Yes*	*Jan-14*	*Regulatory Affairs; Operations, IT*
	6	*Next scheduled submission was confirmed accurate and timely with DMS.*	*Yes*	*Feb-14*	*Regulatory Affairs; Operations, IT*