



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 8, 2014

RE: ID # WC2014CS-1

Dear Mr. McMahan:

On behalf of WellCare of Kentucky, Inc., ("WellCare"), I am responding to your letter dated March 25, 2014 which indicated WellCare was not in substantial compliance with Section 22.1 Required Function of our contract and requested corrective action.

WellCare acknowledged issues that contributed to the missed metrics in its March 10, 2014 Call Center report ("Report #11"). As a result of the upfront disclosure of this issue and remediation plan submitted along with Report #11, your March 25, 2014 letter relayed acceptance of the corrective action plan with a modification. In addition to the steps outlined in the quality management document, you requested additional information around WellCare's process to ensure appropriate coverage during weather related events.

The information below, in addition to the attached step actions, restates the efforts WellCare has undertaken to remediate these issues and provides the additional detail requested.

1. WellCare recognizes extenuating circumstances related to weather affected call center metrics.

Due to severe weather, there was decreased staff attendance in our Illinois customer service office, which impacted WellCare of Kentucky provider service levels. During January, February and March, our Streator, Illinois call center (where Kentucky calls are primarily handled) experienced six days of severe adverse weather conditions that resulted in closed schools and roads. The effect of these closures resulted in the inability of staff to get to work, and therefore decreased performance. Additionally, there were weather related events in other parts of the country (e.g. ice storm in Atlanta) that impacted our call centers in other states. These call centers would have normally been able to absorb some of the high call volume experienced in Illinois; however due to these weather events, the capability for these offices to provide support was limited. To address the immediate need for staffing during these events, WellCare:



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- Implemented an “All Hands on Deck” approach, meaning all non-mission critical offline activities were cancelled. Adherence and conformance to all agent schedules was closely monitored.
- Unlimited overtime was offered in an attempt to cover the Kentucky Member and Provider call lines. This offer was not limited to our Illinois site; all sites/vendors that could assist Kentucky were targeted. WellCare also offered lunch waivers, as well as free lunches to those forgoing their lunches in an effort to help with service levels. Free coffee and hot chocolate were also passed out to staff arriving to work early and on time.
- Customer service agents servicing both members and providers within other states across the WellCare’s enterprise were identified to assist and call volume was routed to other sites/vendors as service limits would allow.

II. Membership projections for the expansion population greatly exceeded initial forecasts, resulting in increased volume during the first quarter of 2014.

Our initial service staffing plans were largely driven by membership projections based upon Department estimates that approximately 125,000 new Medicaid expansion members would join the program out of 280,000 newly eligible enrollees. Of those 125,000 to enroll in 2014, preliminary Departmental estimates indicated that approximately 78,000 expansion members would enroll prior to January 1, 2014. Estimates provided that the remainder of the 125,000 expansion members would enroll during February and March. Recent calculations as late as last week have indicated that Kentucky Medicaid has added approximately 293,000 Medicaid beneficiaries, more than double the initial estimate from last Fall.

Based on the larger than predicted number of expansion members, enrollment exceeded the initial projection. As a result of this increased membership, WellCare experienced a 177% increase in member call volume and a 125% increase in provider call volume in February. In order to meet increased member demand, many provider agents were detailed to our member service lines. In addition to the immediate actions taken to stabilize performance levels, WellCare also implemented long-term strategies to minimize further impact from future adverse weather events. The attached spreadsheet provides a detailed account of corrective actions.

III. WellCare reported missed call center metrics for the behavioral health line based on section 33.6 Behavioral Health Services Hotline; however, the metric was miscalculated.

According to the contract, section 33.6 Behavioral Health Services Hotline, the Contractor shall ensure that the toll-free Behavioral Health Services Hotline meets the following minimum performance requirements for all Contractor Programs and Service Areas:

- A. Ninety-nine percent (99%) of calls are answered by the fourth ring or an



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- automated call pick-up system;
- B. No incoming calls receive a busy signal;
- C. At least eighty percent (80%) of calls must be answered by toll-free line staff within thirty (30) seconds measured from the time the call is placed in queue after selecting an option;
- D. **The call abandonment rate is seven percent (7%) or less;**
- E. The average hold time is two (2) minutes or less; and
- F. The system can immediately connect to the local Suicide Hotline’s telephone number and other Crisis Response Systems and have patch capabilities to 911 emergency services.

Based on this requirement, and not the requirements identified in section 22.1 Required Functions, WellCare agrees that the behavioral health line abandonment rate reported was beyond the contractual standard as reported. However, all other behavioral health reporting metrics were met.

Behavioral Health (Main/Trunk)	Total all Incoming Calls/VDN	Health Integrated
	Feb. 14	Feb. 14
Number of Calls	307	307
Number of Calls Abandoned	23	23
% Abandoned Calls	7.49%	7.49%
Average Speed to Answer (seconds)	16	16
Highest Maximum Delay (minutes)	0:03:09	0:03:09
% Calls Answered on or before 4th Ring	100%	100%
% Calls Receiving Busy Signal	0%	0%
% Calls Answered within 30 Seconds	85%	85%
Average Length of Call (minutes)	0:01:44	0:01:44

Upon further review, WellCare determined that our new vendor, Health Integrated, miscalculated the percentage of abandoned calls within the February report. The calculation incorrectly divided the total number of abandoned calls by the total number of calls received, yielding an overall metric of 7.49%, beyond the contractual requirements. However, this calculation was not in line with reporting specifications. The vendor should have reported calls abandoned over our internal threshold of ten (10) seconds (which exceed the contractual minimum of 30 seconds), rather than the total number of calls abandoned. This issue has been remediated with Health Integrated and will not affect future reporting.



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Thus, the corrected metric for percentage of abandoned calls is 3.25% (ten calls abandoned over 10 second threshold divided by the total number of calls received). WellCare will submit a revised February report with the April 10, 2014 submission to reflect this corrected metric.

IV. Section 22.1 does not prescribe metrics for the provider call line, but rather establishes requirements for the member services line.

Member service metrics do not appear, based on a plain reading of the contractual language, to be applicable to the provider service line.

Pursuant to our contract, section 22.1:

The Contractor shall have a Member Services function that includes a call center which is staffed and available by telephone Monday through Friday 7 am to 7 pm Eastern Standard Time (EST). The call center shall meet the current American Accreditation Health Care Commission/URAC-designed Health Call Center Standard (HCC) for call center abandonment rate, blockage rate and average speed of answer. If a Contractor has separate telephone lines for different Medicaid populations, the Contractor shall report performance for each individual line separately. The Department will inform the Contractor of any changes/updates to these URAC call center standards.

The contractual language goes further to require the Contractor to self-report their prior month performance in the three areas, call center abandonment rate, blockage rate and average speed of answer, for their member services and twenty-four/seven (24/7) hour toll-free medical call-in system to the Department. Enumerated provisions A-V do not offer standard functions for the provider service line. Section 27.1 of our contract states "The Contractor shall operate a provider call center that meets standards as determined by the Department."

V. WellCare acknowledges that the provider service line metrics contained outliers when compared to standards established for the member service line in 22.1.



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Provider (Main/Trunk Line)	Total all Incoming Calls/VDN	WC_CAID_KYPro v_1276E	22.1 Member Standards
	Feb. 14	Feb. 14	
Number of Calls	23,583	23,583	N/A
Number of Calls Abandoned	2,629	2,629	N/A
% Abandoned Calls	11.15%	11.15%	< 5%
Average Speed to Answer (seconds)	202	202	< 60
Highest Maximum Delay (minutes)	0:22:11	0:22:11	
% Calls Answered on or before 4th Ring	100%	100%	99%
% Calls Receiving Busy Signal	0%	0%	0%
% Calls Answered within 30 Seconds	34%	34%	80% with 30 seconds
Average Length of Call (minutes)	0:07:42	0:07:42	N/A

VI. WellCare has implemented steps for corrective action as discussed in the March 10, 2014 Quality Management Report and provides the additional information as requested.

Both the adverse weather conditions and increase in enrollment had a compounding effect on our performance with regard to our provider service lines. As previously referenced, WellCare has implemented both immediate and long-term corrective actions to address inclement weather and staffing needs. As evidenced within the attached corrective action plan, WellCare has recruited, hired, and is in the process of training additional staff. However, these efforts require significant amount of time to implement. In order to ensure our agents can provide quality service, they must complete a six (6) week mandatory training course. The steps included provide additional details and completion dates to resolve issues noted in the March 25, 2014 letter.

WellCare feels privileged to serve our Kentucky membership and wants to assure the Department that we are taking the necessary steps to ensure all of our new customer service representatives are adequately trained and are capable of providing the highest possible service level to our members and providers. Please contact me at Rosmond.dolen@wellcare.com or 502-253-5106 should you have any further questions.



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Director of Regulatory Affairs

Sincerely,

A handwritten signature in black ink that reads "Rosmond Dolen".

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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Received: March 25, 2014				
Failure to meet standards for call center abandonment rate for providers and Behavioral Health				Repeat Deficiency?
				No
Step Action	Complete?	Target Completion Date or Actual Completion Date	Responsible Department	
Immediate Step Actions Taken				
1	Implemented an "All Hands on Deck" approach, meaning all non-mission critical offline activities were cancelled. Adherence and conformance to all agent schedules was closely monitored. In addition we also activated our all-day conference bridge with our Command Center & Mission Control colleagues across the network in an effort to help facilitate the real time management of the situation.	Yes	Feb-14	Customer Service; Operations
2	Unlimited overtime was offered in an attempt to cover the Kentucky Member and Provider call lines. This offer was not limited to our Illinois site; all sites/vendors that could assist Kentucky were targeted. WellCare also offered lunch waivers, as well as free lunches to those forgoing their lunches in an effort to help with service levels. Free coffee and hot chocolate were also passed out to staff arriving to work early and on time.	Yes	Feb-14	Customer Service; Operations; Human Resources
3	Customer service agents servicing other states across the WellCare enterprise were identified to assist and call volume was routed to other sites/vendors as service limits would allow.	Yes	Feb-14	Customer Service; Operations
4	Review reporting metrics with our Behavioral Health Crisis Line vendor. It was determined that a miscalculation led to inaccurate reporting of the abandonment percentage. Issue has been remediated and metric has been confirmed to be well-within compliance of the Kentucky metric of 7%	Yes	Mar-14	Operations; Delegation Oversight
Step Actions Currently Undergoing Completion				
5	WellCare is currently revising existing contingency plans to include greater flexibility in transferring incoming Kentucky calls to customer service sites in other states.	Yes	Mar-14	Customer Service; Operations
6	WellCare has significantly increased customer service staffing in addition to providing cross training classes to allow greater flexibility in allowing agents stationed in other areas to assist with member calls. The following actions have been completed or are in process for completion:			Customer Service; Operations; Human Resources
	Twenty (20) trained provider agents went live on 3/10/2014	Yes	Mar-14	Customer Service; Operations; Human Resources
	Sixteen (16) trained member agents went live 3/20/14	Yes	Mar-14	Customer Service; Operations; Human Resources
	Nine (9) existing provider agents were cross trained for Kentucky member services. These agents completed training on 3/26/14.	Yes	Mar-14	Customer Service; Operations; Human Resources
	Twenty-two (22) Kentucky trained member agents will go live on 4/9/14.	In Process	Apr-14	Customer Service; Operations; Human Resources
	An additional fourteen (14) Kentucky trained agents are scheduled to go live on 5/6/14.	In Process	May-14	Customer Service; Operations; Human Resources