



2020 HealthQuest Wellness Program Audit

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**Prepared for
The State Employee Health Plan
State of Kansas**

Submitted by:
Sagebrush Analytic Solutions
5080 Spectrum Drive, Suite 1000e
Addison, Texas 75001

(214) 273-4300 Main
(214) 273-4310 Fax
www.eSagebrush.com



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Executive Summary

SEHBP offers health and wellness benefits through its HealthQuest program to its employees and their dependents. Benefits incent and promote health and wellness and include, but are not limited to:

- Biometric Screenings
- Employee Assistance Program
- Naturally Slim Weight Management Program
- Wellness Champion Network
- Health Coaching
- Wellness Challenges
- Learning Modules
- Flu Shots

Participants engage in the program offerings and accrue points. Ordinarily, when an employee participant or spouse accrues 40 points, \$480 is deducted from the following year's medical premium. Due to reduced program access in 2020 due to COVID, the qualifying points were reduced to 20 from 40. In addition to the opportunity to earn 2021 premium discounts, employees and spouses enrolled in certain plans and who earn credits by participating in wellness activities throughout 2020 are eligible for contributions to their HRA/HSA from the State.

The program is administered by Cerner. In addition to Cerner, the program incorporates provider partners, including:

- Naturally Slim
- ComPsych
- Marathon Health (clinic)
- US Wellness (biometric screening provider)

The partners provide health and wellness services to participants and are responsible for reporting participation that results in program credits.

SEHBP engaged Sagebrush Analytic Solutions (Sagebrush) to conduct an audit of the administration of the health and wellness benefits to determine overall accuracy in accounting for points and applying resulting premium reductions. The study period of the audit is calendar year 2020.

Methodology Overview

Sagebrush audited focused samples of the HealthQuest participant population in order to evaluate the accuracy of point accruals and premium reductions. Sagebrush selected focused samples from subpopulations with partners/program services that affect point accrual. Samples were also selected from participants with changes to eligibility status, i.e., addition of a spouse, to ensure proper accrual of points.

The audit was conducted remotely, using State and vendor data and reports. The point accruals for each in the Member Administration Portal (MAP) data was compared to participation documentation maintained by Cerner or provider partners for accuracy. The testing also included reverse tests for participants in HealthQuest programs that do not accrue points.

The points for the sampled participants were traced through to premium reductions in 2021, to ensure the accuracy of the deductions.

Summary of Findings

Audit Methodology

Available Data and Information

Sagebrush collected the following data and information from SEHP, Cerner, and program partners.

Exhibit 1 – Available Data and Information

Available Data Files and Information	Source	Used for
2020 Benefit Descriptions Health Reimbursement Account (HRA) Description	SEHP	Determining whether the correct points and premium reductions were credited for program milestones achieved by participants
Campaign_Goal_Incentive_Detail_List_data _SageBrush_10.18.2021.xlsx; SOK Campaign Points 2020_SageBrush.XISX	Cerner	Selecting stratified samples of participants for testing
<ul style="list-style-type: none"> 2020 Stratum 1.xlsx 2020_Stratum 2.xlsx 	Cerner	Supporting the program credits earned by participants and spouses through various eligibility changes
<ul style="list-style-type: none"> 2020 Stratum 3.xlsx BCBSKS and Aetna claims data Wellness Sample IDs - ComPsych.xlsx NaturallySlim_StateOfKansas_Audit_11162021.xlsx USWellness_SOK _Audit_Review_Biometrics_20211217.xlsx 	Cerner and Program Partners	Supporting the program credits earned by participants and spouses by meeting various program milestones
Attribute File (premium discounts earned through HealthQuest wellness program)	SEHP	Determining whether credits collected and reported by Cerner correctly resulted in the sampled participant's MAP eligibility for premium reductions

Summary of Findings

Available Data Files and Information	Source	Used for
KPAY230 (payroll files) NSE Invoice Report	SEHP	Verifying the correct amounts were deducted from 2021 premiums for 2020 program participation

Sample Selection

The following table describes the samples selected and the corresponding tests applied.

Exhibit 2 – Focused Sample Selections and Audit Tests

Population	# of Samples	Tests
1. Spouse is hired by State during 2020	5	<ul style="list-style-type: none"> Were points in employee’s account correctly split into employee and spouse (now also employee) accounts? If employee or spouse accrued sufficient points, were 2021 premium reductions correct?
2. Employee and Spouse both work for State and either employee or spouse retire in 2020	5	<ul style="list-style-type: none"> Were points in individual accounts correctly combined into employee account? If employee or spouse accrued sufficient points, were 2021 premium reductions correct?
3. Employees or their dependents with points accrued in MAP through US Wellness, the biometric provider	5	<ul style="list-style-type: none"> Ensure reported participation from US Wellness resulted in correct point allocation in MAP. If employee or spouse accrued sufficient points, were 2021 premium reductions correct? Sagebrush will also conduct a reverse electronic test to identify any participant with accrued points in US Wellness data that are not in the Cerner or MAP data.
4. Employees or their dependents with points accrued in MAP through Naturally Slim, the weight loss provider	5	<ul style="list-style-type: none"> Ensure reported participation from Naturally Slim resulted in correct point allocation in MAP.

Summary of Findings

Population	# of Samples	Tests
		<ul style="list-style-type: none"> • If employee or spouse accrued sufficient points, were 2021 premium reductions correct? • Sagebrush will also conduct a reverse electronic test to identify any participant with accrued points in Naturally Slim data that are not in the Cerner or MAP data.
5. Employees or their dependents with points accrued in MAP through ComPsych, the Employee Assistance Plan (EAP) provider	5	<ul style="list-style-type: none"> • Ensure reported participation from ComPsych resulted in correct point allocation in MAP. • If employee or spouse accrued sufficient points, were 2021 premium reductions correct? • Sagebrush will also conduct a reverse electronic test to identify any participant with accrued points in ComPsych data that are not in the Cerner or MAP data.
6. Employees or their dependents with points accrued in MAP through HealthQuest Clinic (Marathon Health), for wellness testing	5	<ul style="list-style-type: none"> • Ensure reported participation from HealthQuest Clinic resulted in correct point allocation in MAP. • If employee or spouse accrued sufficient points, were 2021 premium reductions correct? • Sagebrush will also conduct a reverse electronic test to identify any participant with accrued points in HealthQuest Clinic data that are not in the Cerner or MAP data.

Sample Findings

Eligibility Changes – Strata 1 & 2

The following table displays the results of the testing of samples in strata 1 and 2. The purpose of this testing is to ensure that earned points are credited properly and appropriate payroll deductions applied to participant employees and their spouses that either became State employees or terminated as State employees during 2020.

No exceptions were identified in the crediting of points to employee and/or spouse employee during eligibility changes.

Summary of Findings

Exhibit 3 – Results for Strata 1 & 2

Sample #	Strata*	Employee Incentive Points Earned	Points Earned as Spouse	Points Earned as Spouse Employee	Employee Qualifies for 2021 Discount	Spouse Qualifies for 2021 Discount	SEHP Applied 2021 EE Discount	SEHP Applied 2021 SP Discount	Employee Discount Amount is Correct	Spouse (as Employee) Discount Amount is Correct	Notes
1	1	60	0	53	✓	✓	✓	✓	✓	✓	
2	1	3	3	0					✓	✓	
3	1	33	0	14	✓		✓		✓	✓	
4	1	3	0	8					✓	✓	
5	1	65	0	79	✓	✓	✓	✓	✓	✓	
6	2	6	3	0					✓	✓	
7	2	0	0	0					✓	✓	COBRA/RETIRED.
8	2	39	6	41	✓	✓	✓		**	**	**Not in Payroll/NSE data provided for audit
9	2	14	1	0					✓	✓	
10	2	8	0	3					✓	✓	

*Stratum 1 = Spouse is hired by State during 2020. Stratum 2 = Employee and Spouse both work for State and either employee or spouse retire in 2020.

Summary of Findings

Credit Reporting by Wellness Partner Program – Strata 3 through 6

The following table displays the results of the testing of samples in strata 3 through 6. The purpose of this testing is to determine whether issues exist in documenting and reporting earned credits through wellness program partners.

Out of 40 participants reviewed, Sagebrush identified the following exceptions and observations:

- Wellness Program Partner ComPsych documentation did not support credits reported by Cerner for one participant. The exception did not affect the 2021 premium discount, since the employee and spouse far exceeded the credits required for discounts. (Sample 21)

Cerner could not provide the documentation received from the Program Partner in 2020 as support, due to Cerner document retention policies. Cerner’s description of its document retention policies are as follows:

“Cerner’s retention policy regarding PHI basically states that employees are to limit the data to only what is necessary to perform a specific task and to purge the PHI as soon as said task is complete.

The PHI regarding the scope of this audit does not belong to Cerner nor does Cerner have it stored anywhere. Cerner does have records of credits based on PHI received from other vendors the state of Kansas partnered with such as BCBS and Aetna.

The state of Kansas authorized Cerner to work with their other program partners (BCBS, Aetna, etc.) to receive claims data to use for applying credits. The claims data for the 2020 campaign has since been purged.”

- Data provided to Sagebrush from Cerner did not contain adequate detail to determine the provider of the wellness service if multiple Wellness Program Partners could have provided the service. An example of such a service is the flu vaccine, which can be obtained through multiple avenues, including Marathon Clinics, SEHP-sponsored clinics, or through one of the medical plans. Cerner was able to research the source of the data credits but it does not appear that the credit source is stored as a data field to create an audit trail.

Summary of Findings

Exhibit 4 – Results for Strata 3 though 6

Sample #	Strata	Primary Goal Name	Incentive Points Earned for Goal			Auditor Notes	Total Employee 2020 Incentive Points Earned	Total Spouse 2020 Incentive Points Earned	Qualifies for 2021 Discount	SEHP Applied 2021 Discount	Discount Amount Correct
			Supported by Wellness Partner Documentation	Reported by Cerner							
11	3	State-Sponsored Biometric Screening Services (Onsite Screening, Healthy Range Incentive Form, or Home Test Kits)	5	5		37	8	✓	✓	✓	
12	3	State-Sponsored Biometric Screening Services (Onsite Screening, Healthy Range Incentive Form, or Home Test Kits)	5	5		79	0	✓	✓	✓	
13	3	State-Sponsored Biometric Screening Services (Onsite Screening, Healthy Range Incentive Form, or Home Test Kits)	5	5		52	3	✓	✓	✓	

Summary of Findings

Sample #	Strata	Primary Goal Name	Incentive Points Earned for Goal			Total Employee 2020 Incentive Points Earned	Total Spouse 2020 Incentive Points Earned	Qualifies for 2021 Discount	SEHP Applied 2021 Discount	Discount Amount Correct
			Supported by Wellness Partner Documentation	Reported by Cerner	Auditor Notes					
14	3	State-Sponsored Biometric Screening Services (Onsite Screening, Healthy Range Incentive Form, or Home Test Kits)	5	5		57	0	✓	✓	✓
15	3	State-Sponsored Biometric Screening Services (Onsite Screening, Healthy Range Incentive Form, or Home Test Kits)	5	5		38	0	✓	✓	✓
16	4	Naturally Slim (credits to appear after 10-week completion)	15	15		18	0			
17	4	Naturally Slim (credits to appear after 10-week completion)	15	15		65	0	✓	✓	✓

Summary of Findings

Sample #	Strata	Primary Goal Name	Incentive Points Earned for Goal		Auditor Notes	Total Employee 2020 Incentive Points Earned	Total Spouse 2020 Incentive Points Earned	Qualifies for 2021 Discount	SEHP Applied 2021 Discount	Discount Amount Correct
			Supported by Wellness Partner Documentation	Reported by Cerner						
18	4	Naturally Slim (credits to appear after 10-week completion)	15	15		76	71	✓	✓	✓
19	4	Naturally Slim (credits to appear after 10-week completion)	15	15		66	52	✓	✓	✓
20	4	Naturally Slim (credits to appear after 10-week completion)	15	15		33	29	✓	✓	✓
21	5	EAP Webinars & On-Demand Training (up to 1 credit daily)	8	9	Partner report does not match Cerner report, although 2021 discount is not affected by error.	70	73	✓	✓	✓
22	5	EAP Webinars & On-Demand Training (up to 1 credit daily)	1	1		42	0	✓	✓	✓
23	5	EAP Webinars & On-Demand Training (up to 1 credit daily)	2	2		24	0	✓	✓	✓

Summary of Findings

Sample #	Strata	Primary Goal Name	Incentive Points Earned for Goal		Auditor Notes	Total Employee 2020 Incentive Points Earned	Total Spouse 2020 Incentive Points Earned	Qualifies for 2021 Discount	SEHP Applied 2021 Discount	Discount Amount Correct
			Supported by Wellness Partner Documentation	Reported by Cerner						
24	5	EAP Webinars & On-Demand Training (up to 1 credit daily)	6	6		72	50	✓	✓	✓
25	5	EAP Webinars & On-Demand Training (up to 1 credit daily)	2	2		20	0	✓	✓	✓
26	6	Annual Flu Shot	1	1	Cerner data does not include source of vaccination data. Marathon confirmed not the source. Confirmed vaccine with BCBSKS data.	21	29	✓	✓	✓
27	6	Annual Flu Shot	1	1	Cerner data does not include source of vaccination data. Marathon confirmed not the source. Confirmed vaccine with BCBSKS data.	20	0	✓	✓	✓
28	6	Annual Flu Shot	1	1	Cerner data does not include source of vaccination data. Marathon confirmed not the source. Confirmed vaccine with SEHP data for EI	37	8	✓	✓	✓

Summary of Findings

Incentive Points Earned for Goal						Total Employee 2020 Incentive Points Earned	Total Spouse 2020 Incentive Points Earned	Qualifies for 2021 Discount	SEHP Applied 2021 Discount	Discount Amount Correct
Sample #	Strata	Primary Goal Name	Supported by Wellness Partner Documentation	Reported by Cerner	Auditor Notes					
					Dorado Corrections Flu Clinic with Cerner.					
29	6	Annual Flu Shot	1	1	Cerner data does not include source of vaccination data. Marathon confirmed not the source. Confirmed vaccine with BCBSKS data.	27	31	✓	✓	✓
30	6	Annual Flu Shot	1	1	Cerner data does not include source of vaccination data. Marathon confirmed not the source. Confirmed vaccine with BCBSKS data.	6	0			✓

Summary of Findings

State HSA/HRA Account Contributions

In addition to the opportunity to earn 2021 premium discounts, employees and spouses in plans C, Q, N, J who earn credits by participating in wellness activities throughout 2020 will be eligible for contributions to their HRA/HSA from the State. Employees and spouses receive a \$10 incentive contribution in their HRA/HSA for each credit earned, up to 50 credits, or \$500. Credits must have been earned prior to November 18, 2020 to receive an incentive payment in 2020.

Sagebrush reviewed sampled participants in strata 3 through 6 to determine whether Cerner-reported information supported State contributions to the sampled participants' HRA/HSAs. Sagebrush used the following methodology to make the determination:

- Identified sampled participants in plans C, Q, N, and J as eligible for HRA/HSA contributions.
- Using the Cerner-provided worksheet SOK Campaign Points 2020_SageBrush.xlsx, Sagebrush relied on the data field "latest_week_with_activity" to determine whether the sampled participant earned credits eligible for SOK HRA/HSA contributions on the December 26, 2020 payroll.
- Sagebrush relied on the SEHP-provided payroll file KPAY230.D0111.T203104.OUT to determine the amount of the contribution, if any. Plan type code 67 denotes employer HSA contributions, and plan type code 68 denotes employer HRA contributions. Plan type must also be considered with Plan Code, where HSAREW = HSA Rewards and HRAREW = HRA Rewards.

The following table presents the results of the HRA/HSA contributions review.

Out of 40 participants reviewed in strata 3 through 6, Sagebrush identified the following exceptions and observations:

- Sampled participants not enrolled in plans C, Q, N, and J did not receive employer HRA/HSA contributions.
- Sagebrush observed accurate regular Quarter 1 2021 employer contributions.
- Sagebrush did not observe any exceptions to incentive reward contributions.

Summary of Findings

Exhibit 5 – Results for Employer HRA/HSA Contribution Testing

Sample #	Strata	Plan Eligible for SOK HSA/HRA Contributions	Latest Cerner-Reported Credit Activity	12/26/20 SOK HSA/HRA Contribution	Total Employee 2020 Incentive Points Earned	Total Spouse 2020 Incentive Points Earned	HSA/HRA Contribution Correct
11	3	C	1/1/2021	\$312.50	37	8	✓
16	4	N	1/1/2021	\$125.00	18	0	✓
17	4	C	1/1/2021	\$437.50	65	0	✓
18	4	C	1/1/2021	\$312.50	76	71	✓
19	4	C	1/1/2021	\$312.50	66	52	✓
20	4	C	1/1/2021	\$312.50	33	29	✓
21	5	C	1/1/2021	\$312.50	70	73	✓
22	5	N	1/1/2021	\$125.00	42	0	✓

Summary of Findings

Sample #	Strata	Plan Eligible for SOK HSA/HRA Contributions	Latest Cerner-Reported Credit Activity	12/26/20 SOK HSA/HRA Contribution	Total Employee 2020 Incentive Points Earned	Total Spouse 2020 Incentive Points Earned	HSA/HRA Contribution Correct
23	5	J	1/1/2021	\$0.00	24	0	No HSA/HRA incentive contribution recorded since credits accrued after 11/18/20 cutoff. ✓
24	5	C	1/1/2021	\$312.50	72	50	✓
25	5	C	1/1/2021	\$0.00	20	0	✓
28	6	C	1/1/2021	\$312.50	37	8	✓
29	6	N	1/1/2021	\$156.25	27	31	✓
30	6	C	1/1/2021	\$0	6	0	✓

Conclusion

The project results indicate that the HealthQuest wellness credit collection and reporting process appears to function as intended.

Cerner should enhance its database to include the source of the participant credit when multiple Wellness Program Partners may have sourced the service.