

MCNA INSURANCE COMPANY

Utah Medicaid Managed Care Program

Independent Accountant's Report on a
Performance Audit of MCNA Dental
Encounter Data

For the period of January 1, 2021 through
February 28, 2023

May 6, 2025



Mr. Greg Trollan
Department of Health and Human Services
Office of Managed Healthcare
288 North 1460 West
Salt Lake City, Utah 84116

Dear Mr. Trollan:

This report presents the results of Myers and Stauffer's work conducted to address the performance audit objectives relative to MCNA Insurance Company's encounter data and in satisfaction of 42 Code of Federal Regulations § 438.602(e). Our audit is being performed under Myers and Stauffer's master contract #196387 with Utah Department of Health and Human Services (UDHHS). Our audit covered the period of January 1, 2021 through February 28, 2023.

We conducted this audit in accordance with the performance audit provisions of Generally Accepted Government Auditing Standards (GAGAS) issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Management responses from MCNA Insurance Company are included in this report. We did not audit their responses and, accordingly, we do not provide any assurances on them.

This report is intended solely for the information and use of Utah Department of Health and Human Services, Milliman, and MCNA Insurance Company management and is not intended to be, and should not be, used by anyone other than these specified parties.

Sincerely,

Myers and Stauffer LC
Kansas City, MO
May 6, 2025



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Executive Summary

Introduction

The Utah Department of Health and Human Services (UDHHS) has contracted with MCNA Insurance Company (MCNA or MCNA Dental), a managed care entity (MCE), to provide dental services under the Utah Medicaid managed care program. Dental coverage is available to eligible Medicaid members who meet certain criteria (e.g., members who are pregnant and EPSDT eligible children). Contract services and performance requirements are governed by the associated Medicaid contract for that state fiscal year (SFY). Contract compliance is measured for the Medicaid population. Expansion members are included, if applicable. UDHHS requested Myers and Stauffer complete a performance audit to validate the encounter data on completeness and accuracy, and timeliness of encounter submissions.

Summary of Findings and Recommendations

We reviewed MCNA's encounter data to determine compliance with the CDJ to encounter data completion percentage for the period of January 1, 2021 through February 28, 2023 (at least 95 percent of encounters submitted, but less than 100 percent submitted). The cumulative completion percentage for the plan was in compliance. However, our testing found numerous instances of monthly completion percentages above 100 percent and two months below 95 percent. Additionally, our review of MCNA's encounter data submissions determined that the encounter timeliness threshold was met for the review period (at least 95 percent of encounters submitted within 30 days of adjudication/paid date).

During our review of the reconciled data, we found that MCNA's Encounter TCN and Claim ID in the encounter records do not appear to match MCNA claim numbers reported in the CDJ submission(s). This limited the level of detail in our evaluation of encounter records to CDJ transactions.

We determined the primary contributors to the noncompliant monthly completion percentages to be:

- *Encounter submissions may be missing from the data, particularly for specific paid dates in August 2021 and February 2023.*
- *CDJ submissions may be missing transactions related to adjustments of payments for services prior to the audit period where only the final CDJ payment was included. This may cause some months to be overstated.*



Table 1: MCNA Cumulative Completion Totals and Percentages

MCNA Dental Cumulative Completion Totals and Percentages	
Description	Entire Plan
Encounter Total (FAC reported)	\$32,289,356
<i>Total Encounter Adjustments (\$)</i>	<i>(\$25,447)</i>
<i>Total Encounter Adjustments (%)</i>	<i>-0.07%</i>
Net Encounter Total	\$32,263,909
CDJ Total	\$33,082,870
<i>Variance</i>	<i>(\$818,962)</i>
Completion (%)	97.52%
Contract Minimum Completeness Requirement (%)	95.00%

Table 2: MCNA Encounter Timeliness Analysis

MCNA Dental Encounter Timeliness Analysis		
Description	Total Encounter Count	Percent Compliant
0 - 30 Days*	188,184	95.66%
31 - 60 Days	2,059	1.05%
61 - 90 Days	2,106	1.07%
91 - 120 Days	1,327	0.67%
121 + Days	3,048	1.55%
Total	196,724	100.00%

Recommendations

We recommend that MCNA:

- Identify and submit any potentially missing dental encounter sequences to UHDDS, and
- Confirm all CDJ transaction sequences, including recoupments/adjustments in the period for payments made prior to the period, are included in future data submissions, and
- Ensure a common transaction identifier is available in the encounter and CDJ data to allow for a more detailed evaluation of the data sources.



Background Information

MCNA Insurance Company

MCNA Insurance Company is located in Fort Lauderdale, Florida, and under contract with UDHHS to provide services as a dental benefits manager in the Utah managed care program. MCNA offers a Medicaid dental plan in all Utah counties. UnitedHealthcare, MCNA's parent company, maintains office locations in Metairie, Louisiana; Lincoln, Nebraska; and San Antonio, Texas. The dental Managed Care Entity provides dental services to eligible members who meet certain criteria, such as being pregnant or eligible for EPSDT benefits (expansion members are included if applicable).

Myers and Stauffer conducted a performance audit specific to encounter data for MCNA's Utah Medicaid line of business to ensure that UDHHS is in compliance with 42 CFR § 438.602(e), which requires the state conduct, or contract with an outside entity who will conduct, an independent audit of the accuracy, truthfulness, and completeness of the encounter and financial data submitted by, or on behalf of, each MCE no less frequently than once every three years.

Myers and Stauffer developed a risk assessment to inform the audit procedures we performed. This risk assessment included reviewing the work of other auditors in reviewing MCNA's Management Information System (MIS). The conclusions in those reviews did not appear to negatively impact our audit procedures or increase any identified risks for this audit.



Encounter Data Submission

We have reviewed MCNA's encounter data and determined that the encounter to Cash Disbursement Journal (CDJ) cumulative completion percentage is compliant. However, when testing 26 months of encounter records and CDJ transactions, we found two months with completion percentages below 95 percent and 8 months above 100 percent. Additionally, we have reviewed MCNA's encounter data and determined that the encounter timeliness threshold was met for the period for encounter submissions. We have documented the primary factors contributing to noncompliant monthly completion percentages, along with any recommendations for MCNA to remediate the issues.

Objectives, Scope, and Methodology

Objectives

The contract between MCNA and UDHHS defines the terms of how MCNA will provide dental services to qualified program recipients via a managed care delivery system. The purpose of this report is to provide the results of our performance audit, which measures whether MCNA's encounter data submitted to UDHHS meets the state contract minimum completeness and timeliness requirement of 95 percent of encounters be submitted within 30 calendar days of the date of service or claim adjudication date, when compared to the CDJ files.

1. **Encounter Data Submission:** We assessed the completeness of encounter submissions against the CDJs submitted by MCNA. In addition, we
 - a. Determined whether the state encounter submission completeness and timeliness contract requirements were met, and
 - b. Documented the factors contributing to incorrect and/or incomplete encounter submissions and the impact of these errors on the overall encounter to CDJ completion percentage.

Scope

We performed this audit in accordance with the performance audit provisions of GAGAS issued by the Comptroller General of the United States. The scope of this audit covered the period of January 1, 2021 through February 28, 2023, and the data used met the following criteria:

- *Encounters paid within the reporting period of January 1, 2021 through February 28, 2023.*
- *CDJ transactions had payment dates within the reporting period of January 1, 2021 through February 28, 2023.*
- *Encounters included in the audit period were submitted by MCNA, received and accepted by UDHHS through September 13, 2023, excluding records submitted into the Provider Reimbursement Information System for Medicaid (PRISM) system.*



- *Myers and Stauffer was transmitted extracts created by UDHHS of these encounter records. We relied on the UDHHS extract process to ensure all applicable encounters for the period under review were provided. Please see data analysis assumption number 1 in Appendix D for additional explanation regarding source data presumptions.*

A formal audit of internal controls over MCNA's MIS and UDHHS' compliance with state and federal regulations related to encounter data was not performed. We determined the State has privacy and security policies in place for each department. Medicaid standard operating procedures are in place in the scenarios where stronger policies and procedures are required. The Division of Technology Services manages the data warehouse and they have policies that cover how the data is handled securely. Edits are in place for encounter submissions to identify duplicate submissions and reject them. Additionally, UDHHS has the ability to move/update encounters to a rejected state when other issues are identified. UDHHS has procedures in place to perform data quality checks as data is received. The scope of our audit did not include an assessment of the implementation and/or effectiveness of MCNA's or UDHHS' encounter data internal controls.

Methodology

For this audit, we reviewed MCE contracts, internal control reports (i.e., Service Organizational Controls reports), and Cash Disbursement Journals (CDJs) provided by MCNA and performed a risk assessment based on the above objective(s). Our testing included comparing the encounter submissions sent to us by UDHHS against the CDJs submitted by the MCE. In addition, we worked with the MCE to request that the CDJ file(s) submitted included all payments, refunds, and adjustments that were issued to providers during the audit period.

After receiving the encounter data submissions from UDHHS, we applied our proprietary reconciliation logic using Structured Query Language (SQL) in a Microsoft SQL Server database. We made the following adjustments to the encounter data during our analysis, and *Table 3* below outlines the impact of applying these encounter adjustments to the encounter paid amounts, when compared to the raw data received.

1. Encounters identified as denials are assumed to have zero dollar MCE paid amounts. Additionally, encounter voids with missing former/linked transaction control numbers or with original encounters already offset by backouts, are excluded from the encounter totals.
2. Myers and Stauffer identified potential duplicate encounters using our encounter review logic. Both paid encounters as well as void encounters were reviewed for identification of potential duplicate encounter submissions. Based on a comparison to the CDJ files, we noted some may be actual duplicate submissions, and some may be replacement encounter records without a matching void (i.e., calculated voids). The potential duplicate and calculated void totals noted in the table(s) below are considered actual duplicate submissions for reporting purposes and excluded from the compliance totals. These values may be reduced in the future by MCE



encounter corrections and/or responses by the MCE to dispute these identifications (e.g., noting split claims).

3. Our potential duplicate and calculated void process attempts to identify and exclude encounter payment amounts that appear to be duplicated. Encounters paid by the MCE, but noted as denied were included in both our potential duplicate and calculated void processes. It should be noted that the inclusion of denied encounters by either UDHHS or the MCE can artificially inflate the percentages of encounter counts and paid amounts being removed. In the case of encounters identified as denied, some of these encounters may have already been identified and flagged during submission as being duplicates.
4. Timeliness standards were tested based on the submission date populated in the encounter data extracts in comparison to the paid date identified in the completion reconciliation process through either the encounter extract or any MCE supplied supplemental data, if available.

Table 3: Myers and Stauffer's Adjustments to MCNA Encounters

Myers and Stauffer LC's Adjustments to MCNA Encounters			
Description	Encounter		Paid Amount (% of Total*)
	Count	Paid Amount	
Total Encounter Amount (FAC Reported)	196,724	\$32,289,356	100.00%
<i>Adjustment Type</i>			
<i>Denied</i>	(3,621)	(\$16,270)	-0.05%
<i>Calculated Void</i>	0	\$0	0.00%
<i>Duplicate</i>	(50)	(\$9,178)	-0.02%
<i>Total Adjustments Made</i>	(3,671)	(\$25,447)	-0.07%
Net Encounter Amounts	193,053	\$32,263,909	99.93%

* - Percentage ratios are rounded down for each adjustment type and may not add up to the total percentage of adjustments made for this reporting period. Please see data analysis assumption number 8 on page 18 for further explanation.

Criteria

The encounter data submission process is governed by the contract between UDHHS and the MCE, which includes the following requirements for an encounter to be considered complete and timely:

- *MCE Contract Attachment B Article 12.3.1(E) states: "The Contractor shall transmit Encounter Data within 30 calendar days of the service or Claim adjudication date. The Encounter Data shall represent all Encounter Claim types (professional and institutional) received and adjudicated by the Contractor."*
- *MCE Contract Attachment B Article 12.3.1(G) states: "If the Contractor fails to transmit at least 95 percent of its Encounter Data within the timely submission standard in Article 12.3.1(E) of this attachment, the Department may require corrective action."*[^]

[^] Myers and Stauffer references the SFY2023 contracts for MCNA Medicaid Dental in this report.



- *We tested for a range of encounter completion between ninety-five (95%) and one hundred percent (100%) to identify instances of both missing encounter payments (which would cause understated completion percentages) as well as missing encounter voids (which would cause overstated completion percentages). We performed these calculations on a monthly and cumulatively or reporting period basis, allowing further insights into the severity of the impact on the health plan to be recognized.*
- *We calculated encounter submission timeliness by comparing the date the encounter was submitted and/or received by UDHHS (SUBMITDATE field in the raw encounter extract) to the reconciled paid date. Instances of records where the encounter submission date was before the reconciled paid date would be excluded from the analysis below, but this did not impact MCNA.*

Condition

The overall MCNA encounter data completeness contract requirement was met for the period. However, the MCNA Medicaid Dental (MDEN) encounter submissions and/or CDJ files appear to be partially incomplete for some months within the reporting period, due to missing claim sequences in the encounter data (both positive payments and recoupments/voids) and some potentially missing CDJ sequences. This is causing some monthly completion percentages to be above 100 percent or below 95 percent (see Appendix A.1 on pages 12 to 13). Eight months are non-compliant with completion percentages exceeding the 100 percent requirement, including January 2021 through April 2021, July 2021, December 2021, June 2022, and July 2022. Two months are below the 95 percent compliance requirement, including August 2021 at 68.16 percent and February 2023 at 59.56 percent.

Additionally, 95.66 percent of encounters were submitted within the 30 day requirement window. The encounters appear to meet the timeliness requirement of 95 percent of encounters submitted within 30 days adjudication/payment. See Appendix A.2 on page 14.

Findings

Cause

We noted that MCNA's Encounter TCN and Claim ID values in the encounter records do not appear to match the MCNA CDJ claim numbers. This created some limitations to the level of detail in our evaluation of encounter records to CDJ transactions. During the review of our reconciled data, it was determined that the primary contributors to the noncompliant monthly completion percentages may be:

- *Encounter records may be missing from MCNA's submissions within the reporting period, particularly for specific paid dates in August 2021 and February 2023.*



- *MCNA appears to be missing almost all encounters for paid dates between August 11, 2021 and August 17, 2021 and between February 20, 2023 and February 28, 2023, when compared to submitted CDJ files.*
- *Potentially missing CDJ sequences that are causing the misallocation of payments between months, or prior to the audit period, when the two data sources are compared (both positive payments and recoupments/voids).*
- *Throughout the reporting period, we identified instances of missing CDJ sequences when compared to the encounters. This is particularly occurring for adjusted encounters where the original payment was made prior to the audit period, but adjusted more recently. This is causing months like January 2021 to April 2021 to be overstated due to the CDJ recoupment/voids missing and only the a partial payment included in the CDJ submission.*

Effect

The MCE's claim payment information is utilized to ensure completeness and accuracy of submitted data from the MCE and the state. Missing payment sequences will cause variances and may lead to a cumulative completion percentage that is outside of acceptable ranges. Missing voids will result in the overstatement of the encounter data completion percentage.

Alternatively, the MCE's encounters are also used for other department analyses and decision making, potentially including capitation rate development. Missing and inaccurate encounter data can result in impacted analytics as well as capitation rates that do not accurately capture the cost of the services provided. Encounter paid amounts that are overstated, when compared to claim payment information, may cover significantly more than the cost of the services provided.

Recommendation

We recommend MCNA review their encounter submission procedures to ensure processes are in place to submit all claim sequences into the encounter data; and we recommend MCNA work with UDHHS to identify any encounter records that may require (re)submission. Additionally, we recommend MCNA establish a system for CDJ/financial reporting to include all transaction sequences (including all recoupments and voids) that occur within the period in future submissions. We also recommend MCNA identify a solution to include a common claim transaction identifier in future encounter and CDJ records to allow for an improved detailed data evaluation. Further recommendations to encounter requirements will be documented separately and provided to UDHHS directly.



Appendix

Appendix A.1: MCNA Summary Reporting Charts

Figure 1: Monthly CDJ Totals and Encounter Submission for MCNA

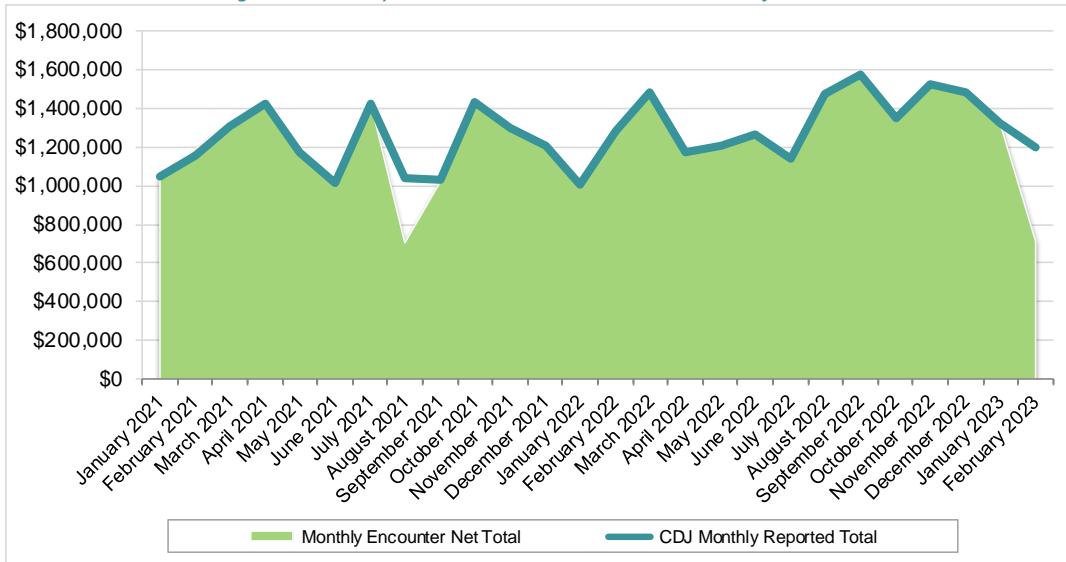


Figure 2: MCNA Monthly Encounter Submissions Expressed as a Percentage of Payments Submitted to UDHHS to Reported MCE CDJ Payments

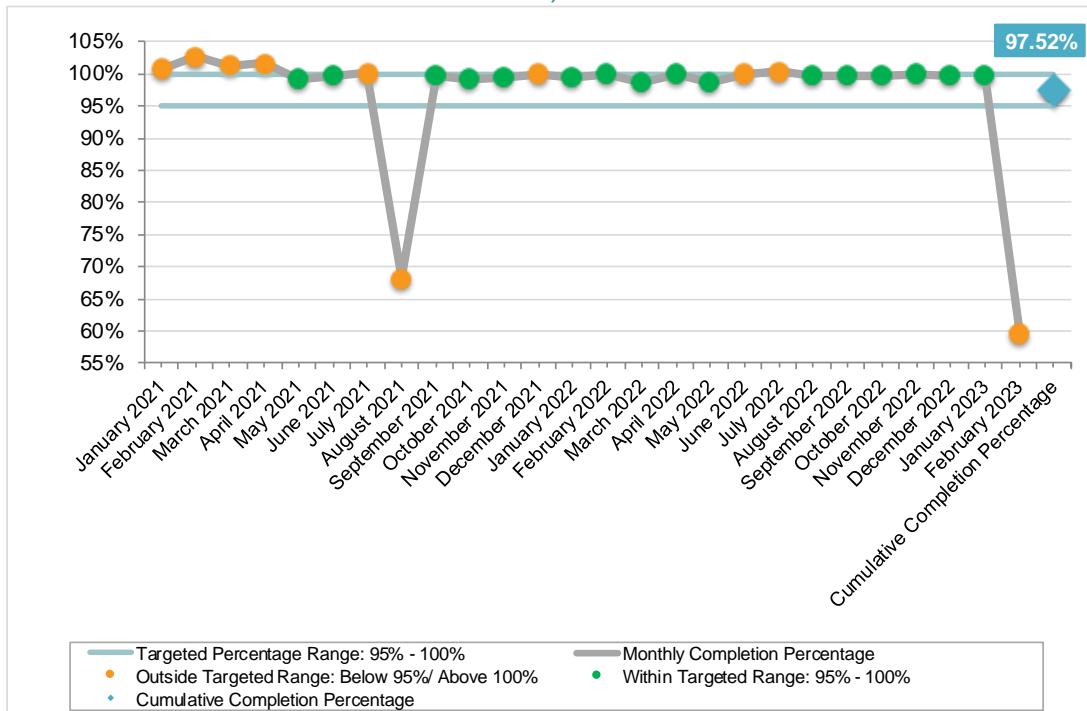




Table 4: MCNA Monthly Table

MCNA Dental							
Paid Month	Monthly Encounter Total (Reported)	Monthly Encounter Total (Adjustments)	Percentage of Encounters Adjusted	Monthly Encounter Net Total	CDJ Monthly Reported Total	Monthly Variance	Monthly Completion Percentage
January 2021	\$1,057,932	(\$407)	-0.03%	\$1,057,525	\$1,049,040	\$8,485	100.80%
February 2021	\$1,189,925	(\$448)	-0.03%	\$1,189,477	\$1,158,247	\$31,230	102.69%
March 2021	\$1,330,480	(\$593)	-0.04%	\$1,329,887	\$1,312,632	\$17,255	101.31%
April 2021	\$1,447,044	(\$616)	-0.04%	\$1,446,429	\$1,422,918	\$23,511	101.65%
May 2021	\$1,163,257	(\$418)	-0.03%	\$1,162,839	\$1,171,949	(\$9,110)	99.22%
June 2021	\$1,015,573	(\$966)	-0.09%	\$1,014,607	\$1,018,016	(\$3,409)	99.66%
July 2021	\$1,430,887	(\$877)	-0.06%	\$1,430,010	\$1,427,414	\$2,596	100.18%
August 2021	\$707,851	(\$271)	-0.03%	\$707,580	\$1,038,066	(\$330,487)	68.16%
September 2021	\$1,028,034	(\$786)	-0.07%	\$1,027,249	\$1,030,280	(\$3,032)	99.70%
October 2021	\$1,425,839	(\$741)	-0.05%	\$1,425,099	\$1,436,351	(\$11,252)	99.21%
November 2021	\$1,293,107	(\$1,868)	-0.14%	\$1,291,240	\$1,297,717	(\$6,477)	99.50%
December 2021	\$1,209,838	(\$565)	-0.04%	\$1,209,273	\$1,208,502	\$771	100.06%
January 2022	\$998,211	(\$459)	-0.04%	\$997,752	\$1,003,384	(\$5,632)	99.43%
February 2022	\$1,287,812	(\$548)	-0.04%	\$1,287,264	\$1,287,291	(\$27)	99.99%
March 2022	\$1,471,438	(\$4,238)	-0.28%	\$1,467,200	\$1,486,610	(\$19,410)	98.69%
April 2022	\$1,176,836	(\$488)	-0.04%	\$1,176,348	\$1,176,850	(\$503)	99.95%
May 2022	\$1,198,151	(\$1,394)	-0.11%	\$1,196,757	\$1,211,587	(\$14,830)	98.77%
June 2022	\$1,266,300	(\$442)	-0.03%	\$1,265,858	\$1,265,139	\$719	100.05%
July 2022	\$1,145,809	(\$984)	-0.08%	\$1,144,824	\$1,139,657	\$5,167	100.45%
August 2022	\$1,472,565	(\$834)	-0.05%	\$1,471,732	\$1,475,808	(\$4,076)	99.72%
September 2022	\$1,574,693	(\$1,026)	-0.06%	\$1,573,667	\$1,579,434	(\$5,766)	99.63%
October 2022	\$1,342,805	(\$620)	-0.04%	\$1,342,185	\$1,346,535	(\$4,350)	99.67%
November 2022	\$1,529,923	(\$1,012)	-0.06%	\$1,528,911	\$1,529,019	(\$108)	99.99%
December 2022	\$1,480,682	(\$1,302)	-0.08%	\$1,479,380	\$1,482,441	(\$3,061)	99.79%
January 2023	\$1,328,947	(\$2,257)	-0.16%	\$1,326,691	\$1,329,148	(\$2,457)	99.81%
February 2023	\$715,414	(\$1,289)	-0.18%	\$714,126	\$1,198,834	(\$484,709)	59.56%
Cumulative Totals	\$32,289,356	(\$25,447)	-0.07%	\$32,263,909	\$33,082,870	(\$818,962)	97.52%
<i>State Contract Minimum Completeness Percentage Requirement</i>							95.00%



Appendix A.2: Encounter Timeliness Verification Chart

Table 5: MCNA Encounter Submission Timeliness Comparison

MCNA Dental Encounter Timeliness Totals and Percentages		
Description	Entire Plan	
	Encounter Count / Percent Compliant	
0 - 30 Days	188,184	95.66%
31 - 60 Days	2,059	1.05%
61 - 90 Days	2,106	1.07%
91 - 120 Days	1,327	0.67%
121 + Days	3,048	1.55%
Total	196,724	100.00%



Appendix B: Definitions and Acronyms

The following terms are used throughout this document:

- **Calculated Void Encounter (CV)** – An encounter that Myers and Stauffer LC has identified as being a replacement encounter that does not appear to have a corresponding void of the original encounter in the data warehouse.
- **Cash Disbursement Journal (CDJ) Monthly Reported Total** – The sum of all payments from a MCE or delegated vendor to service providers for a given month as reported by the MCE.
- **Managed Care Entity (MCE)** - A private organization that has entered into a contractual arrangement with the Utah Department of Health and Human Services (UDHHS) to obtain and finance care for enrolled Medicaid members. MCEs receive a capitation or per member per month (PMPM) payment from UDHHS for each enrolled member. Eight MCEs were operating in the state of Utah during the reconciliation period. They are as follows: Health Choice Utah; Healthy U & University of Utah, HOME program; MCNA Dental; Molina Healthcare; Optum Tooele County; Premier Access; Salt Lake County Optum; and SelectHealth Community Care.
- **Medicaid Management Information System (MMIS)** – The claims processing system used to adjudicate Utah Medicaid claims. MCE submitted encounters are loaded into this system and assigned a unique claim identifier.
- **Monthly Completion Percentage** – The percentage of the monthly encounter total in relation to the CDJ monthly reported total, net of adjustments.
- **Monthly Encounter Net Total** – The sum of the encounter submissions for a given month incorporating the Myers and Stauffer encounter data adjustments made to the encounter submissions stored in the encounter data warehouse.
- **Monthly Encounter Total (Adjustments)** – The sum of all Myers and Stauffer adjustments for a given month that were removed from the encounter submissions stored in the encounter data warehouse.
- **Monthly Encounter Total (State Reported)** – The sum of all encounter submissions for a given month stored in the encounter data warehouse.
- **Monthly Variance** – The difference between the monthly encounter total and the CDJ monthly reported total for a given month, net of adjustments.
- **Potential Duplicate Encounter (PDUP)** – An encounter that Myers and Stauffer has identified as being a potential duplicate of another encounter in the data warehouse.
- **Potential Duplicate Void (PVDUP)** – An encounter, identified as a void, that Myers and Stauffer has identified as being a potential duplicate of another encounter, also identified as a void, in the data warehouse. PVDUP totals are included in the duplicate category in summary tables above.



- **Prepaid Mental Health Plan (PMHP)** – A private organization that provides mental health and/or substance use disorder services to eligible Medicaid members residing in specific counties. Two traditional PMHPs were operating in the state of Utah during the reconciliation period: Optum Tooele County (for members residing in Tooele County, Utah) and Salt Lake County Optum (for members residing in Salt Lake County, Utah). In addition, there are eight non-traditional PMHPs operating in the state of Utah, which were audited in separate reports.



Appendix C: Analysis

We analyzed the information reported on each encounter to capture the amount paid on the entire claim. Encounter totals were calculated by summarizing the data by the MCE paid date, MCE identification number, and specific delegated vendor and program criteria. Each cash disbursement submitted by the MCE was summarized by paid date, MCE program identifier, and delegated vendor to create a matching table. These matching tables were combined using common fields and were used to produce the results.

Based on criteria noted in our review of the encounter data, we identified MCNA encounters as follows:

MCE and Program Identification:

- *MCNA MDEN Encounters*
 - *Trading Partner ID of 'HT007992-001.'*
 - *Encounters with a Submitting Plan of '522459969001.'*



Appendix D: Data Analysis Assumptions

1. We assume that all data provided to Myers and Stauffer is complete and accurate, when compared to the submission source(s).
2. Voided encounter records contained within the encounter submissions were coded to match the associated adjustment's paid date to allow for the proper matching of cash disbursements that occurred due to this void transaction. However, we were unable to assign a paid date to the void transactions in which there was not an associated adjustment encounter. This may be contributing to monthly completion percentage variances when the original payment and void do not occur within the same month.
3. We identified that some encounters submitted as voids had MCE paid amounts greater than or equal to zero. Based on a review of these records, we have ensured that all non-zero voids have negative paid amounts.
4. During our audit procedures, we noted that the encounter and CDJ claim numbers did not match. This made it difficult to identify potential issues in the data.
5. We instructed the MCEs to exclude referral fees, management fees, and other non-encounter related fees in the CDJ data submitted to Myers and Stauffer.
6. Interest amounts do not appear to be included in the MCE paid amounts. We have therefore excluded the separately itemized interest expense from the CDJ totals.
7. There are instances of encounter records with all zero dollar line MCE paid amounts and non-zero header MCE paid amounts. For the purposes of this reconciliation, we are using the header MCE paid amounts.
8. Percentage ratios noted in this report are rounded down. The sum of the percentages may not add up to the percentage sum totals (*Table 3*).
9. Opportunities for improving the encounter reconciliation process have been identified during the analysis of the encounter data and cash disbursement journals, as well as frequent interactions with the MCEs, their delegated vendors, and UDHHS. While we have attempted to account for these situations, other potential issues within the data may exist that have not yet been identified which may require us to restate a report or modify reconciliation processes in the future.



Appendix E: MCE Response

MCNA acknowledges the recommendations outlined in the draft report. MCNA will review the CDJ files for paid dates between February 7, 2023, and February 14, 2023, to identify any potentially missing transactions. Additionally, we will ensure that any potentially missing dental encounter sequences, including voids, are identified and submitted in accordance with contractual and federal requirements. We look forward to reviewing any further recommendations that will be provided to UDHHS directly.