

Managed Care Compliance and Operations  
Corrective Action Plans (CAPs) as of November 30, 2019

| MCO/DMO/MTO | Program(s)        | Service Area(s)/Region | Area of Non-Compliance  |
|-------------|-------------------|------------------------|---|
| Aetna       | STAR<br>CHIP      | All Service Areas      | <b>Behavioral Health Hotline</b><br>The MCO did not meet the ≤7% standard for the call abandonment rate.  |
| Aetna       | STAR              | All Service Areas      | <b>Appointment Availability (Prenatal)</b><br>The MCO failed to timely perform an MCO Administrative Service.   |
| Aetna       | STAR<br>STAR KIDS | All Service Areas      | <b>Appealed Claims Aggregate (Acute, BH, LTSS)</b><br>Failure to resolve at least 98% of Provider Appeals within 30 calendar days of the MCO's receipt. |
| Aetna       | STAR              | All Service Areas      | <b>Appointment Availability (Vision)</b><br>The MCO failed to timely perform an MCO Administrative Service.   |
| Aetna       | STAR Kids         | All Service Areas      | <b>Nurse Hotline</b><br>The MCO did not meet the ≤7% standard for the call abandonment rate.  |
| Aetna       | ALL               | All Service Areas      | <b>Operational Review Follow-up</b><br>The MCO failed to timely perform an MCO Administrative Service.  |
| Aetna       | ALL               | All Service Areas      | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.  |
| Amerigroup  | STAR+PLUS         | All Service Areas      | <b>Utilization Review</b><br>The MCO fails to timely provide a MCO Covered Service that is not otherwise associated with a performance standard.        |
| Amerigroup  | ALL               | All Service Areas      | <b>IG Audit</b><br>The MCO failed to respond to requests for information.   |
| Amerigroup  | STAR              | All Service Areas      | <b>Appointment Availability (Prenatal)</b><br>The MCO failed to timely perform an MCO Administrative Service.   |
| Amerigroup  | STAR<br>STAR+PLUS | All Service Areas      | <b>2016 FREW Timely Checkups</b><br>The MCO did not meet all time or distance access standards.   |

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| Amerigroup                | STAR Kids                 | All Service Areas        | <b>Covered Service (Overhead Lift)</b><br>The MCO failed to provide a covered service   |
| Amerigroup                | STAR+PLUS                 | All Service Areas        | <b>SAO Audit</b><br>The MCO failed to perform an MCO Administrative Service.  |
| Amerigroup                | STAR Kids                 | All Service Areas        | <b>Appointment Availability (Vision)</b><br>The MCO failed to timely perform an MCO Administrative Service.                                     |
| Amerigroup                | STAR+PLUS                 | All Service Areas        | <b>Appointment Availability (PCP)</b><br>The MCO failed to timely perform an MCO Administrative Service.  |
| Amerigroup                | STAR Kids                 | All Service Areas        | <b>Operational Review Follow-up</b><br>The MCO failed to timely perform an MCO Administrative Service.  |
| Blue Cross Blue Shield    | STAR Kids                 | 1Q; Travis<br>1P; Travis | <b>FSR to Encounter Reconciliation (Medical)</b><br>The MCO failed to reconcile medical encounters to within a 2% variance.                     |
| Blue Cross Blue Shield    | STAR<br>CHIP<br>STAR Kids | All Service Areas        | <b>Operational Review Follow-up (Acute Care and LTSS Utilization Review)</b><br>The MCO failed to timely perform an MCO Administrative Service. |
| Blue Cross Blue Shield    | ALL                       | All Service Areas        | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.  |
| Children's Medical Center | ALL                       | All Service Areas        | <b>MCO Hotlines (Member, Provider, Nurse)</b><br>The MCO did not meet hotline performance standards.  |
| Children's Medical Center | ALL                       | All Service Areas        | <b>Timely Prior Authorizations</b><br>The MCO failed to timely perform an MCO Administrative Service.   |
| Children's Medical Center | ALL                       | All Service Areas        | <b>FSR to Encounter Reconciliation (Medical)</b><br>The MCO failed to reconcile pharmacy encounters to within a 2% variance.                    |

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| Children's Medical Center | ALL        | All Service Areas      | <b>Appealed Claims Aggregate</b><br>Failure to adjudicate 98% of appealed claims within 30 days.   |
| Children's Medical Center | ALL        | All Service Areas      | <b>Operational Review Follow-up (Compliance, Utilization Review)</b><br>The MCO failed to timely perform an MCO Administrative Service.          |
| Children's Medical Center | ALL        | All Service Areas      | <b>Operational Review Follow-up (Acute Utilization Review)</b><br>The MCO failed to timely perform an MCO Administrative Service.                |
| Cigna HealthSpring        | STAR+PLUS  | All Service Areas      | <b>Provider Directory</b><br>The MCO failed to ensure that the provider directory remained current.  |
| Cigna HealthSpring        | ALL        | All Service Areas      | <b>Utilization Review</b><br>The MCO fails to timely provide a MCO Covered Service that is not otherwise associated with a performance standard. |
| Cigna HealthSpring        | ALL        | All Service Areas      | <b>Provider Complaints</b><br>The MCO failed to resolve at least 98% of Provider Complaints within 30 calendar days.                             |
| Cigna HealthSpring        | ALL        | All Service Areas      | <b>Member Complaints</b><br>The MCO failed to resolve at least 98% of Member Complaints within 30 calendar days.                                 |
| Cigna HealthSpring        | STAR+PLUS  | All Service Areas      | <b>Third Party Audit (Self-Reported Data)</b><br>The MCO failed to accurately perform an MCO Administrative Service.                             |
| Cigna HealthSpring        | ALL        | All Service Areas      | <b>Operational Review Follow-up</b><br>The MCO failed to timely perform an MCO Administrative Service.   |
| Cigna HealthSpring        | ALL        | All Service Areas      | <b>Operational Review Follow-up (Therapy and Transition Issues)</b><br>The MCO failed to timely perform an MCO Administrative Service.           |

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| Cigna HealthSpring          | STAR<br>STAR Kids<br>CHIP | All Service Areas      | <b>2018 Appointment Availability (Vision)</b><br>The MCO failed to timely perform an MCO Administrative Service.                       |
| Cigna HealthSpring          | ALL                       | All Service Areas      | <b>Provider Contract Terminations</b><br>The MCO failed to notify HHSC within five days of a provider contract termination.            |
| Cigna HealthSpring          | ALL                       | All Service Areas      | <b>IG Audit</b><br>The MCO had non-compliances in three areas of service coordination.   |
| Cigna HealthSpring          | ALL                       | All Service Areas      | <b>LTSS Appealed Claims</b><br>The MCO failed to resolve at least 98% of appealed claims within 30 calendar days of the MCO's receipt. |
| Cigna HealthSpring          | ALL                       | All Service Areas      | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.                                   |
| Community First Health Plan | STAR Kids                 | KA; Bexar              | <b>Clean Claims Adjudication (Acute, Behavioral Health, LTSS)</b><br>The MCO failed to adjudicate 98% of clean claims within 30 days.  |
| Community First Health Plan | STAR Kids                 | KA; Bexar              | <b>Appealed Claims Aggregate</b><br>Failure to resolve at least 98% of Provider Appeals within 30 calendar days of the MCO's receipt.  |
| Community First Health Plan | ALL                       | Bexar                  | <b>Operational Review Follow-up (General)</b><br>The MCO failed to timely perform an MCO Administrative Service.                       |
| Community First Health Plan | STAR<br>STAR Kids<br>CHIP | All Service Areas      | <b>Appointment Availability (Vision)</b><br>The MCO failed to timely perform an MCO Administrative Service.                            |
| Community First Health Plan | STAR<br>STAR Kids<br>CHIP | All Service Areas      | <b>Appointment Availability (PCP)</b><br>The MCO failed to timely perform an MCO Administrative Service.                               |
| Community First Health Plan | STAR<br>CHIP              | All Service Areas      | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.                                   |

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| Community First Health Plan | STAR Kids    | All Service Areas      | <b>Expiring ISP</b><br>The MCO failed to timely process expiring ISPs.  |
| Community Health Choice     | ALL          | All Service Areas      | <b>Operational Review Follow-up</b><br>The MCO failed to timely perform an MCO Administrative Service.                      |
| Community Health Choice     | STAR         | All Service Areas      | <b>Appointment Availability (Prenatal)</b><br>The MCO failed to timely perform an MCO Administrative Service.               |
| Community Health Choice     | ALL          | All Service Areas      | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.                        |
| Cook Children's             | ALL          | All Service Areas      | <b>Provider Directory</b><br>The MCO failed to ensure that the provider directory remained current.                         |
| Cook Children's             | ALL          | All Service Areas      | <b>IG Audit - Improper Release of Funds</b><br>The MCO failed to appropriately perform an MCO Administrative Service.       |
| Cook Children's             | STAR         | 66; Tarrant            | <b>Third Party Audit (Self-Reported Data)</b><br>The MCO failed to accurately perform an MCO Administrative Service.        |
| Cook Children's             | STAR Kids    | All Service Areas      | <b>Member Appeals</b><br>The MCO failed to resolve at least 98% of Member Appeals within the specified timeframes.          |
| Cook Children's             | STAR<br>CHIP | All Service Areas      | <b>Appealed Claims Aggregate</b><br>The MCO failed to adjudicate 98% of appealed claims within 30 days.                     |
| Cook Children's             | ALL          | All Service Areas      | <b>Operational Review Follow-up (Utilization Review)</b><br>The MCO failed to timely perform an MCO Administrative Service. |
| Cook Children's             | ALL          | All Service Areas      | <b>MCO Hotlines (Behavioral Health)</b><br>The MCO incorrectly routed calls to an unmonitored phone number.                 |

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| Cook Children's | STAR       | All Service Areas      | <b>Appointment Availability (Prenatal)</b><br>The MCO failed to timely perform an MCO Administrative Service.                       |
| Cook Children's | STAR Kids  | All Service Areas      | <b>IG Audit</b><br>The MCO had non-compliances in three areas of service coordination.  |
| Cook Children's | ALL        | All Service Areas      | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.                                |
| Dell Children's | ALL        | All Service Areas      | <b>Operational Review Follow-up (Retro Claims Processing)</b><br>The MCO failed to timely perform an MCO Administrative Service.    |
| Dell Children's | ALL        | All Service Areas      | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.                                |
| DentaQuest      | Dental     | Statewide              | <b>Claims Processing</b><br>The DMO failed to notify providers of a claims processing limitation.                                   |
| DentaQuest      | Dental     | Statewide              | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.                                |
| DentaQuest      | Dental     | Statewide              | <b>Member Complaints</b><br>The MCO failed to resolve Member Complaints within 30 days of receipt.                                  |
| DentaQuest      | Dental     | Statewide              | <b>Member Appeals</b><br>The MCO failed to resolve Member Complaints within 30 days of receipt.                                     |
| Driscoll        | ALL        | All Service Areas      | <b>Clean and Appealed Claims Adjudication (Acute, BH, LTSS)</b><br>The MCO failed to adjudicate 98% of clean claims within 30 days. |

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| Driscoll               | STAR Kids                 | All Service Areas      | <b>Operational Review Follow-Up (LTSS)</b><br>The MCO failed to timely perform an MCO Administrative Service.                         |
| Driscoll               | STAR<br>STAR Kids<br>CHIP | All Service Areas      | <b>Appointment Availability (Vision)</b><br>The MCO failed to timely perform an MCO Administrative Service.                           |
| Driscoll               | STAR                      | 82, Nueces             | <b>Provider Complaints</b><br>The MCO failed to resolve 98% of Provider Complaints within 30 calendar days.                           |
| Driscoll               | STAR Kids                 | All Service Areas      | <b>Vision Encounters</b><br>The subcontractor has not submitted encounter data since November 2016.                                   |
| Driscoll               | STAR<br>STAR Kids         | KC; Hidalgo            | <b>Nurse Hotline</b><br>The MCO failed to meet the 80% call hold rate standard.   |
| Driscoll               | STAR                      | All Service Areas      | <b>Member Complaints</b><br>The MCO failed to meet the 98% standard for complaints resolved within 30 days.                           |
| Driscoll               | ALL                       | All Service Areas      | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.                                  |
| El Paso Health         | STAR                      | 37; El Paso            | <b>Appointment Availability (Prenatal)</b><br>The MCO failed to timely perform an MCO Administrative Service.                         |
| El Paso Health         | ALL                       | All Service Areas      | <b>Operational Review Follow-Up</b><br>The MCO failed to timely perform an MCO Administrative Service.                                |
| First Care Health Plan | ALL                       | All Service Areas      | <b>Inaccurate Encounter Reporting</b><br>The MCO failed to submit accurate institutional vision and behavioral health encounter data. |
| First Care Health Plan | STAR                      | All Service Areas      | <b>2016 FREW Timely Checkups</b><br>The MCO failed to timely perform an MCO Administrative Service.                                   |

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| First Care Health Plan                  | ALL                    | All Service Areas      | <b>Operational Review Follow-Up</b><br>The MCO failed to timely perform an MCO Administrative Service.                            |
| First Care Health Plan                  | STAR                   | 50; Lubbock            | <b>Operational Review Follow-up (Acute Utilization Review)</b><br>The MCO failed to timely perform an MCO Administrative Service. |
| Logisticare                             | Medical Transportation | All Regions            | <b>Desk Review Performance</b><br>The MTO failed to meet 98% of the desk review findings.   |
| Logisticare                             | Medical Transportation | All Regions            | <b>Client Services Complaints</b><br>The MTO failed to timely resolve client service delivery complaints.                         |
| Logisticare                             | Medical Transportation | All Regions            | <b>Client Satisfaction Survey</b><br>The MTO failed to meet the 95% client satisfaction standard.                                 |
| Logisticare                             | Medical Transportation | All Regions            | <b>Encounter Submissions</b><br>The MTO failed to meet encounter standards.   |
| Logisticare                             | Medical Transportation | All Regions            | <b>IG Audit</b><br>The MTO did not successfully meet criteria reviewed.   |
| Medical Transportation Management (MTM) | Medical Transportation | All Regions            | <b>Accident/Incident Client Safety</b><br>The MTO failed to timely report accidents and incidents.                                |
| Medical Transportation Management (MTM) | Medical Transportation | All Regions            | <b>Customer Satisfaction Results</b><br>Failure to achieve an overall 95% on annual customer satisfaction surveys.                |
| Medical Transportation Management (MTM) | Medical Transportation | All Regions            | <b>Encounter Submissions</b><br>The MTO failed to meet encounter standards.   |
| Medical Transportation Management (MTM) | Medical Transportation | All Regions            | <b>IG Audit</b><br>The MCO failed to respond to requests for information.   |



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| Medical Transportation Management (MTM) | Medical Transportation | All Regions            | <b>Performing Provider Monitoring</b><br>The MTO failed to monitor performing providers and submit complete and timely reports.   |
| Molina                                  | ALL                    | All Service Areas      | <b>Provider Complaints</b><br>The MCO failed to resolve 98% of Provider Complaints within 30 calendar days.   |
| Molina                                  | ALL                    | All Service Areas      | <b>Appealed Claims Aggregate (Acute)</b><br>Failure to resolve at least 98% of Provider Appeals within 30 calendar days of the MCO's receipt; within 10 days for nursing facility claims. |
| Molina                                  | ALL                    | All Service Areas      | <b>Operational Review Follow-up (Utilization Review)</b><br>The MCO failed to timely perform an MCO Administrative Service.   |
| Molina                                  | STAR                   | All Service Areas      | <b>Appointment Availability (Prenatal)</b><br>The MCO failed to timely perform an MCO Administrative Service.   |
| Molina                                  | STAR+PLUS              | All Service Areas      | <b>Appointment Availability (Vision)</b><br>The MCO failed to timely perform an MCO Administrative Service.   |
| Molina                                  | ALL                    | All Service Areas      | <b>PBM Audit</b><br>The MCO's formulary did not align with the Vendor Drug Program.   |
| Parkland                                | ALL                    | All Service Areas      | <b>Appointment Availability (Behavioral Health)</b><br>The MCO failed to timely perform an MCO Administrative Service.  |
| Parkland                                | ALL                    | All Service Areas      | <b>Third Party Audit (Self-Reported Data)</b><br>The MCO failed to accurately perform an MCO Administrative Service.  |
| Parkland                                | STAR CHIP              | All Service Areas      | <b>Appealed Claims Aggregate</b><br>Failure to resolve at least 98% of Provider Appeals within 30 calendar days of the MCO's receipt.   |
| Parkland                                | STAR CHIP              | All Service Areas      | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.  |

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| Parkland      | STAR CHIP                        | All Service Areas      | <b>Operational Review Follow-up</b><br>The MCO failed to timely perform an MCO Administrative Service.                                |
| Scott & White | ALL                              | All Service Areas      | <b>Third Party Audit (Self-Reported Data)</b><br>The MCO failed to accurately perform an MCO Administrative Service.                  |
| Scott & White | STAR                             | All Service Areas      | <b>Appointment Availability (Prenatal)</b><br>The MCO failed to timely perform an MCO Administrative Service.                         |
| Scott & White | ALL                              | All Service Areas      | <b>Appointment Availability (Vision)</b><br>The MCO failed to timely perform an MCO Administrative Service.                           |
| Scott & White | ALL                              | All Service Areas      | <b>Utilization Review</b><br>The MCO failed to timely perform an MCO Administrative Service.  |
| Superior      | STAR+PLUS                        | All Service Areas      | <b>Operational Review Follow-up (STAR+PLUS and HCBS processes)</b><br>The MCO failed to timely perform an MCO Administrative Service. |
| Superior      | STAR Kids                        | All Service Areas      | <b>Nurse Hotline</b><br>The MCO did not meet the 80% call hold rate standard.   |
| Superior      | STAR<br>STAR+PLUS                | All Service Areas      | <b>Provider Complaints</b><br>The MCO failed to resolve at least 98% of Provider Complaints within 30 calendar days.                  |
| Superior      | ALL                              | All Service Areas      | <b>Appealed Claims Aggregate</b><br>Failure to resolve at least 98% of Provider Appeals within 30 calendar days of the MCO's receipt. |
| Superior      | STAR<br>STAR Kids<br>STAR Health | All Service Areas      | <b>Appointment Availability (Vision)</b><br>The MCO failed to timely perform an MCO Administrative Service.                           |
| Superior      | STAR Health                      | All Service Areas      | <b>MDCP Consenter Policy</b><br>The MCO failed to provide a covered service because there was no policy in place.                     |

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| Superior         | STAR Health       | All Service Areas      | <b>Covered Services</b><br>The MCO failed to provide covered services to MSHCN members.   |
| Superior         | STAR Health       | All Service Areas      | <b>IG Audit</b><br>The MCO had non-compliances related to assessments, service plan alignment, prior authorizations, and service access and delivery. |
| Superior         | ALL               | All Service Areas      | <b>Agreed Upon Procedures (AUP)</b><br>The MCO was not compliant for elements of the AUP in the FSR.  |
| Texas Children's | ALL               | All Service Areas      | <b>Operational Review Follow-up</b><br>The MCO failed to timely perform an MCO Administrative Service.  |
| Texas Children's | CHIP              | 7M; Harris             | <b>Provider Complaints</b><br>The MCO failed to resolve at least 98% of Provider Complaints within 30 calendar days.                                  |
| Texas Children's | CHIP<br>STAR Kids | All Service Areas      | <b>Clean Claims Adjudication (Acute)</b><br>The MCO failed to adjudicate 98% of clean claims within 30 days.  |
| Texas Children's | STAR Kids         | All Service Areas      | <b>Clean Claims Adjudication (Behavioral Health, LTSS)</b><br>The MCO failed to adjudicate 98% of clean claims within 30 days.                        |
| Texas Children's | STAR              | All Service Areas      | <b>Appealed Claims Aggregate</b><br>Failure to resolve at least 98% of Provider Appeals within 30 calendar days of the MCO's receipt.                 |
| Texas Children's | STAR              | All Service Areas      | <b>Appointment Availability (Prenatal)</b><br>The MCO failed to timely perform an MCO Administrative Service.   |
| Texas Children's | STAR              | All Service Areas      | <b>Appointment Availability (Vision)</b><br>The MCO failed to timely perform an MCO Administrative Service.   |
| Texas Children's | STAR Kids         | All Service Areas      | <b>Nurse Hotline</b><br>The MCO did not meet the $\leq 7\%$ call abandonment rate standard.   |

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| Texas Children's | ALL        | All Service Areas      | <b>Vision Encounter Submission</b><br>The MCO failed to submit encounters since the start of the subcontractor's contract. |
| Texas Children's | STAR Kids  | All Service Areas      | <b>Covered Services</b><br>The MCO failed to provide covered services to MDCP members.                                     |