

Attachment I.B.2-37 Sanctions Report

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Plan was late submitting the 4th Quarter 2009 Financial Report to AHCA - \$200.	3/4/10	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Warning Letter with Business Plan	Failure to meet disconnect rate specific to Part C and Part D current enrollee beneficiary customer service phone lines.	4/5/10	CMS	PR	Additional monitoring and training initiated.
Monetary penalty	Failure to receive prior approval for a continuing education course it provided in the Commonwealth of Kentucky - \$250.	4/22/10	KY DOI	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to upload data file Medication Therapy Management programs into HPMS by deadline	5/14/10	CMS	TN	Prior issues from acquired entity
Notice of Non-Compliance	Failure to timely submit disenrollment transactions for enrollees of a special needs plan who no longer met the special needs status	5/17/10	CMS	NY, TX, CA, MO, NH, WA, ME, SC	Prior issues from acquired entity
Monetary penalty	Failure to pay claims during the 30 day grace period without written notice of discontinuance to impacted members - \$3,000.	6/4/10	UT DOI	UT	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Contractual Non-compliance issues related to the newborn enrollment/unborn activation process - \$120,000.	6/16/10	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Contractual Non-compliance issues related to the newborn enrollment/unborn activation process - \$520,000.	6/16/10	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Contractual Non-compliance issues related to the newborn enrollment/unborn activation process - \$1,120,000.	6/16/10	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Contractual Non-compliance issues related to the newborn enrollment/unborn activation process - \$837,500.	6/16/10	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to respond to Colorado Hospital Average Reimbursement Rate for CY2009 Survey timely - \$1,100.	7/18/10	CO DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to respond to Colorado Hospital Average Reimbursement Rate for CY2009 Survey timely - \$1,100.	7/18/10	CO DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Warning Letter without Business Plan	Failure to meet performance thresholds for plan ratings	8/11/10	CMS	PR	Enhanced initiatives for improving measure performance
Notice of Non-Compliance	Failure to meet Medicare Part D program website requirements	8/19/10	CMS	All states	Updated website
Notice of Non-Compliance	Failure to promptly effectuate payments.	9/17/10	CMS	All states	Updated procedures and database improvements
Warning Letter without Business Plan	Failure to meet performance standards under Accuracy and Accessibility study for Medicare Part C and Part D customer service call centers	9/24/10	CMS	PR	Additional monitoring and training initiated.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Noncompliance with Prompt Payment regulation (Rule 73) - \$500.	9/27/10	PR DOI	PR	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to provide accurate 2010 Ann Notice of Change (ANOC) and Evidence of Coverage (EOC) documents to certain beneficiaries - \$55,880.	10/28/10	CMS	All states	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to meet marketing requirements by agents and/or representatives of organization	11/17/10	CMS	All states	Additional monitoring and training initiated.
Monetary penalty	HHP Target Market Conduct Exam issues relating to deficiencies in business practices. Penalty of \$100,000.	12/1/10	DOI	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Warning Letter without Business Plan	Failure to successfully submit 4Rx data for at least 99% of contract year (CY) 2011 CMS-generated enrollments by deadline	12/21/10	CMS	All states	Updated process and tracking system
Monetary penalty	Administrative fine for failure to timely pay annual appointment invoice - \$1,000.	1/19/11	NV DOI	NV	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to meet marketing requirements by agents and/or representatives of organization	2/11/11	CMS	All states	Additional monitoring and training initiated.
Monetary penalty	Privacy Breach - Member - \$,1000.	2/14/11	KY DOI	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Market Conduct Exam - \$11,000.	3/17/11	KY DOI	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to cross-walk one Plan Benefit Package (PBP) to the correct formulary	4/15/11	CMS	NY	Submitted plan correction
Monetary penalty	Inability to submit Compliant historic Medical Claims Files to MA Health Data Organization - \$5,000.	5/1/11	Attorney General	MA	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to meet call center timeliness standards during the first quarter (Q1) of 2011 for Part C and/or Part D current enrollee beneficiary customer service lines.	5/12/11	CMS	All states	Updated training
Monetary penalty	CO HIC Comprehensive Exam dates 7/1/2007 through 6/30/2009; \$184,000 penalty and \$7,500 surcharge for a total of \$191,500; HIC 58 findings: 3 operations/mgmt., 1 complaint, 38 contract forms, 9 underwriting/rating, 2 claims, 5 utilization review	5/25/11	DOI	CO	HIC - 20 CAPs completed and submitted.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	CO HHP Comprehensive Exam if dates 7/1/2007 through 6/30/2009; \$115,000 penalty and \$7,500 surcharge for a total of \$122,500; HHP 36 findings: 4 operations/mgmt., 1 complaints, 21 contract forms, 4 underwriting, 2 claims, 4 utilization review	5/25/11	DOI	CO	HHP - 15 CAPs completed and submitted.
Monetary penalty	OSHA Violation - re: Training on health hazards - \$1,500.	5/26/11	US Dept. of Labor	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to meet requirements concerning the transmission of plan-generated beneficiary enrollments to CMS.	6/6/11	CMS	All states	Updates to process
Monetary penalty	Meeting requirements in corrective action by submitting outstanding health claim data sets by 5/3/2011 - \$1,000.	6/17/11	MA DOI	MA	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	HHPI of Kentucky Market Conduct Exam 2009 findings: Numerous findings related to Pharmacy rebates; mgmt. agreements; non-registered review agent; misleading advertising. Penalty of \$120,000.	7/1/11	DOI	KY	Corrective actions were implemented to address findings.
Ad-Hoc CAP	Failure to meet performance thresholds for plan ratings	7/5/11	CMS	All states	Enhanced initiatives for improving measure performance
Notice of Non-Compliance	Failure to meet CMS requirements in submitting 4Rx data (enrollment data consisting of 4 fields - Rx ID, Rx BIN, Rx PCN, and Rx Group) timely and successfully for CMS-generated enrollments.	7/11/11	CMS	All states	Updated reporting and tracking
Monetary penalty	HICKY Market Conduct Exam findings penalty Humana's use of misleading statement within their advertising; Humana's failure to notify terminated insured's of their right to a conversion policy; Failure to document the providing of an Outline of Coverage and failure to document the providing of a Guide to Health Insurance for People with Medicare. Penalty of \$32,000.	7/26/11	DOI	KY	HICKY established and implemented procedures to correct the deficiencies and violations noted in the Final Report.
Monetary penalty	Failure to renew SD TPA license timely - \$250.	8/9/11	SD DOI	SD	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	MPI Managed Care Fraud and Abuse Sanction - \$3,225,000.	8/9/11	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to meet one or more call center timeliness standards during the second quarter (Q2) of 2011 for Part C and/or Part D current enrollee beneficiary customer service lines	8/17/11	CMS	PR	Updated training and communication

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Notice of Non-Compliance	Failure to issue accurate Annual Notice of Change/Evidence of Coverage (ANOC/EOC) documents	8/24/11	CMS	All states	Prior issues from acquired entity
Notice of Non-Compliance	Failure to submit the 2010 Attestation of Data Relating to CMS Payment to a Medicare Part D Sponsor and the 2010 Attestation of Plan-to-Plan Reconciliation Payment Data	9/20/11	CMS	All states	Prior issues from acquired entity
Monetary penalty	Failure to respond directly to member as requested by CO DOI - \$550.	10/24/11	CO DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to include members medical records with response when requested by CO DOI - \$550.	10/24/11	CO DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to adhere to the CMS requirement that final bid submissions and final actuarial certifications be complete and accurate at the time of submission.	11/15/11	CMS	All states	Updated processes and monitoring
Ad-Hoc CAP	Failure to meet performance thresholds for plan ratings	11/29/11	CMS	All states	Enhanced initiatives for improving measure performance
Notice of Non-Compliance	Failure to issue required transition fill notices to beneficiaries filling drugs with quantity limits (QL) during the transition period.	11/30/11	CMS	All states	Prior issues from acquired entity
Notice of Non-Compliance	Failure to submit timely Medicare Coverage Gap Discount Program (Discount Program) quarter three-payment confirmation	1/12/12	CMS	All states	Prior issues from acquired entity
Monetary penalty	The 2011 3rd Quarter Claims Aging Report illustrated that Humana was not meeting the 90 day ratio of 99% - \$2,500.	1/26/12	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	OSHA Citation for Inspection No. 316176387 - \$1,800.	2/8/12	Industrial Commission of AZ Division of OSHA	AZ	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to timely renew license in Orlando \$500.	2/14/12	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Non-compliance issue regarding the hospital 60-day inpatient admission hold - \$10,000.	2/23/12	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	2011 4th Quarter Financial Report - Supplemental Claims Aging Report - \$1,400.	2/24/12	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to file report timely - \$500.	3/6/12	NV DOI	NV	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Corrective action plan received regarding the 2011 4th Quarter Financial report - Supplemental claims aging.	3/22/12	AHCA	FL	Submitted CAP, implemented process changes and additional training. Issue closed.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Penalty for KY HHP Chiropractic PT & OT: \$2,500 for failure to maintain a complete and accurate provider directory; \$2,500 for failure to offer clear and conspicuous language in the determination letter; \$1,000 for failure to consistently document the initial number of provider requested visits in the chiropractic pre-authorization process and make that information available for examiner review; \$2,500 for failure to pay or deny claims timely. Penalty of \$8,500.	3/28/12	DOI	KY	Implemented processes to address deficiencies noted.
Notice of Non-Compliance	Failure to comply with the Centers for Medicare & Medicaid Services' (CMS) requirement for MA organizations and Part D sponsors to report Medicare Part C and D data to CMS	4/3/12	CMS	All states	Updated processes and escalation mechanism
Monetary penalty	HMP failed to protect Private Consumer Information by; disclosure of nonpublic financial information to nonaffiliated third parties; disclosure of nonpublic health information and privacy of Consumer Financial and Health Information. Monetary penalty of \$10,000.	4/10/12	DOI	FL	Humana made technical changes to correct the unexpected behavior of the software. Specifically, Humana enhanced its web email security by moving web email behind the array secure desktop. In June 2006, Humana prevented the downloading of attachments by associates using non-Humana workstations. In addition, employees were deployed to the location to ensure the data was properly deleted.
Monetary penalty	HHP failed to protect Private Consumer Information by; disclosure of nonpublic financial information to nonaffiliated third parties; disclosure of nonpublic health information and privacy of Consumer Financial and Health Information. Monetary penalty of \$10,000.	4/10/12	DOI	FL	Humana made technical changes to correct the unexpected behavior of the software. Specifically, Humana enhanced its web email security by moving web email behind the array secure desktop. In June 2006, Humana prevented the downloading of attachments by associates using non-Humana workstations. In addition, employees were deployed to the location to ensure the data was properly deleted.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	HIC failed to protect Private Consumer Information by; disclosure of nonpublic financial information to nonaffiliated third parties; disclosure of nonpublic health information and privacy of Consumer Financial and Health Information. Monetary penalty of \$10,000.	4/10/12	DOI	FL	Humana made technical changes to correct the unexpected behavior of the software. Specifically, Humana enhanced its web email security by moving web email behind the array secure desktop. In June 2006, Humana prevented the downloading of attachments by associates using non-Humana workstations. In addition, employees were deployed to the location to ensure the data was properly deleted.
Monetary penalty	failure to file Antifraud Plan as required by LSA-R.S. 22:572.1 - \$500.	4/17/12	LA DOI	LA	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Non compliance with sections of the contract regarding Hospital 60 day inpatient admission hold.	4/18/12	AHCA	FL	Submitted CAP, implemented process changes and additional training. Issue closed.
Notice of Non-Compliance	Failure to adhere to the 90% upload requirement for scheduled marketing events	5/18/12	CMS	All states	New policy and system enhancements
CAP	The providers have to submit clean claims to be paid for services, pursuant to the Texas prompt payment laws TEX. INS. CODE ANN. §§ 843.342 and 1301.137. One element of a clean claim is the provider's contact information. When certain providers submitted claims to Respondents, the clearinghouse did not forward the provider's contact information to Respondents because of a computer program problem. As a result, Respondents' claims payment system incorrectly treated the claims as deficient. Respondents paid the claims but mistakenly sent the providers deficiency notices and did not pay statutory penalties on the claims if they were not timely paid.	5/22/12	TDI	TX	Claims were reprocessed and paid with interest.
Notice of Non-Compliance	Failure to adhere to the 90% upload requirement for scheduled marketing events	7/18/12	CMS	All states	New policy and system enhancements
Notice of Non-Compliance	Failure to comply with Medicare Part D Medication Therapy Management Program (MTMP) change requirements	7/26/12	CMS	All states	Updated process and monitoring
Notice of Non-Compliance	Failure to meet performance standards under Accuracy and Accessibility study for Medicare Part C and Part D customer service call centers	8/16/12	CMS	All states	Additional monitoring and training initiated.
Monetary penalty	Late renewal for MarketPoint - \$2,500.	9/5/12	FL-Dept. of Financial Services	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Penalty as a result of an HHP 2009 Timely Claim payment and adjustment practices examination. Penalty of \$45,500.	10/12/12	DOI	AZ	Findings were remediated during exam.
Monetary penalty	Penalty as a result of a HIC 2009 Timely Claim payment and adjustment practices examination. Penalty of \$37,250.	10/12/12	DOI	AZ	Findings were remediated during exam.
Monetary penalty	Administrative Fine for failure to file report as required by NAC 683.A155(4)-2010 - \$500.	10/14/12	DOI	NV	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Administrative Fine for failure to file report as required by NAC 683.A155(4)-2011 - \$500.	10/14/12	DOI	NV	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Late Payment of surcharge/tax March2012 - \$835.06.	10/23/12	Treasury	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	MI Assessment Late Filing - \$835.06.	10/23/12	Dept. of Treasury	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to adhere to the CMS requirement that final bid submissions and final actuarial certifications be complete and accurate at the time of submission.	10/26/12	CMS	KY, OH	Process enhancements and additional training
Monetary penalty	Late Payment of surcharge/tax June2012 - \$2,666.14.	11/1/12	Treasury	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Late Payment of surcharge/tax March2012 - \$1,053.87.	11/1/12	Treasury	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Untimely submission of 2012 Chronic Care Improvement Program (CCIP) information	11/8/12	CMS	All states	Additional compliance oversight and improved tracking mechanisms
Monetary penalty	Failure to file Annual TPA HHP by 7/1 - \$500.	11/15/12	DOI	ID	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Plan was late filing the 2012 3rd Quarter Claims Aging Report - \$200.	11/19/12	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Plan was late filing the 2012 3rd Quarter Claims Aging Report (Non-Reform) - \$200.	11/19/12	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Encounter Data Submission Requirements - \$25,000.	11/20/12	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit Slavery era survey on time - \$5,000.	11/30/12	DOI	MD	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit Slavery era survey on time - \$3,000.	11/30/12	DOI	MD	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit Slavery era survey on time - \$1,000.	11/30/12	DOI	MD	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Failure to submit Slavery era survey on time - \$1,000.	11/30/12	DOI	MD	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit Slavery era survey on time - \$3,000.	11/30/12	DOI	MD	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Ad-Hoc CAP	Failure to meet performance thresholds for plan ratings	12/13/12	CMS	All states	Enhanced initiatives for improving measure performance
Notice of Non-Compliance	Failure to submit 2013 bids for two Employer Group Waiver Plans (EGWPs)	12/20/12	CMS	FL, NY, MN, MT, NE, ND, OR, SD, WA	Additional quality control processes
Monetary penalty	Failure to submit 2011 annual report - \$500.	1/22/13	DOI	OK	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Response for complaint documents sent incomplete-deemed late - \$500.	1/22/13	DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to upload 2013 Annual Notice of Change/Evidence of Coverage (ANOC/EOC) documents into HPMS.	1/30/13	CMS	All states	Updated procedures and oversight
CAP and Monetary Penalty	Failure to submit encounter claims with dates of payments in months January 2012 - October 2012 - \$500.	2/7/13	AHCA	FL	Submitted CAP, implemented process changes and additional training. Monetary penalty settles with the regulator. Issue closed.
Monetary penalty	Plan failed to achieve minimum performance standards during the period of calendar year 2011 - \$15,000.	2/19/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Incorrectly issuing refunds to low income subsidy (LIS) eligible beneficiaries.	2/28/13	CMS	All states	Prior issues from acquired entity
Monetary penalty	Penalty due to late payment of Tax/Surcharge - \$258.20.	3/15/13	DOT	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Penalty due to late payment of Tax/Surcharge \$665.79.	3/15/13	DOT	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Penalty due to late payment of Tax/Surcharge - \$884.70.	3/15/13	DOT	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to submit D-SNP renewal requirements by the application deadline	3/27/13	CMS	All states	Clarifications to process
Monetary penalty	Penalty due to late payment of Tax/Surcharge - \$2,133.87.	3/28/13	DOT	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Penalty due to late payment of Tax/Surcharge - \$15,757.82.	3/28/13	DOT	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Penalty due to late payment of Tax/Surcharge - \$4,997.90.	3/28/13	DOT	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Late Filing 2012 Annual Behavioral Health 80/20 Expenditure Report - \$500.	4/19/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to comply with formulary crosswalk (i.e., the assignment of a proposed formulary to a particular bid submission) requirements	4/22/13	CMS	All states	Updated procedures and oversight
Ad-Hoc CAP	Failure to meet one or more actuarial standards in submitting its 2013 Medicare Advantage and/or Part D bids	5/6/13	CMS	All states	Process enhancements and additional training
Monetary penalty	Failure to file supplemental compensation exhibit - \$750.	5/13/13	DOI	WA	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Commonwealth of Kentucky DOI Order of Civil Penalty, Humana Health Plan, Inc. Company continues to use a non-approved version of the application with language that contains the words "abnormal tests" in its Humana One Short Term Medical Application even after having been instructed to remove that language. Penalty of \$15,000.	5/13/13	DOI	KY	Language removed.
Notice of Non-Compliance	Failure to implement the Low Income Subsidy (LIS) subsidy level in your Pharmacy Benefit Manager (PBM) claims processing system as of January 3, 2013	5/17/13	CMS	All states	Corrections to system; updated process
Notice of Non-Compliance	Failure to adhere to the January 8, 2013, HPMS memo related to the accuracy assessment of ANOC/EOC's	6/12/13	CMS	All states	Updated procedures and oversight
Monetary penalty	Penalty due to late payment of Tax/Surcharge - \$214.04.	6/18/13	DOT	MI	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit PNV file in correct formatting \$1,750.	7/3/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Findings from audit of Humana Health Plans of Puerto Rico, Inc., period 2001-2005 - \$750.	7/19/13	DOI	PR	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Late payment of billing - \$200.	7/30/13	DOI	MO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit PNV file timely \$1,750.	8/14/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to submit a Medicare Improvements for Patients and Providers Act of 2008 (MIPPA) compliant State Medicaid Agency Contract (SMAC) by the resubmission deadline	8/28/13	CMS	TX, ME	Updated policies and processes
Monetary penalty	Failure to submit PNV file timely \$250.	8/31/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure found in provider network report for Region 10 \$2,500.	9/10/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Failure found in provider network report for Region 2 \$2,500.	9/10/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure found in provider network report for Region 8 \$2,500.	9/10/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure found in provider network report for Region 9 \$2,500.	9/10/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to fulfill Corrective Action Plan to the satisfaction of the Agency for Health Care Administration - \$26,400.	9/13/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Findings with timely claims payment, balance billing, timely G&A response, provider contracts - \$50,000.	9/17/13	IL DOI	IL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Findings with timely claims payment, balance billing, timely G&A response, provider contracts - \$50,000.	9/17/13	IL DOI	IL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KY DOI Order of Civil Penalty to Humana Health Plan, Inc. shall pay civil penalty of \$65,430 for failure to file forms, including amendments with the KY DOI for approval prior to form being delivered or issued for delivery in the state of KY.	9/17/13	DOI	KY	No further action needed.
Notice of Non-Compliance	Failure to comply with Medicare Part D requirements related to the coverage of Cialis in the administration of contracts	9/17/13	CMS	All states including PR	Improved system tracking
Monetary penalty	Administrative penalty to the State of Maryland in the amount of \$2,300 for violations stated in the Final Exam Report and Consent Order which include failure to file an application form and obtain approval before use; The company failed to send written notice to members which included required appeal rights; the company failed to fulfill the carriers obligations to provide or reimburse for healthcare services.	9/30/13	DOI	MD	Findings were remediated during exam.
Monetary penalty	Additional penalty for deficient submission of the provider network ad-hoc report for Region 2 - \$7,000.	10/8/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Additional penalty for deficient submission of the provider network ad-hoc report for Region 8 - \$3,500.	10/8/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Additional penalty for deficient submission of the provider network ad-hoc report for Region 9 - \$3,500.	10/8/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Penalty for IL HHP and HBP of IL exam. Humana Health Plan and Humana Health Benefit plan of IL Market Conduct Exam civil forfeiture for non-compliance violations determined during exam pertaining to claims and complaints. Penalty of \$50,000.	10/9/13	DOI	IL	\$50,000 penalty paid; procedures instituted and maintained according to consent order. All overcharges or underpayments were reimbursed during the examination.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Additional penalty for deficient submission of the provider network ad-hoc report for Region 2 - \$9,000.	11/4/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Warning Letter without Business Plan	Issuance of inaccurate Evidence of Coverage (EOC) documents to your Medicare enrollees for the Contract Year 2013	11/12/13	CMS	All states	Increased tracking and oversight
Monetary penalty	Penalty - IL HIC Exam. Civil forfeiture as stated in the Stipulation and Consent Order by the IL DOI as a result of non compliant findings during 2013 mandated market conduct exam of Humana Insurance Co NAIC # 73288. Penalty of \$50,000.	11/18/13	DOI	IL	\$50,000 penalty paid; issues addressed and corrected during exam
Monetary penalty	Plan missed filing deadline for 2013 3rd Quarter claims aging report. Report was due on 11/13/13 and ACHA did not receive the report until 11/21/13 - \$1,000.	11/22/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to submit a complete and accurate final bid at the time of submission	12/3/13	CMS	All states	Updated process and system
Monetary penalty	Penalty of \$20,000 for IL HDIC Exam. Civil Forfeiture as a result of findings related to the IL DOI mandated market conduct exam of Humana Dental Insurance Co.	12/11/13	DOI	IL	\$20,000 penalty paid; procedures instituted and maintained according to consent order. All overcharges or underpayments were reimbursed during the examination.
Monetary penalty	Missouri Department of Insurance Stipulation of Settlement and Voluntary Forfeiture as a result of market conduct exam of Humana Health Plan, Inc. Findings included Chiropractic Forms and Filing violations; failure to issue EOB; failure to pay interest on reprocessed claims; immunization claims; limitations on chiro benefits; chiro copayments and limitations; complaint finding - incorrect information provided. Penalty of \$99,000.	12/19/13	DOI	MO	Humana agreed to take remedial action bringing it in to compliance with the statues and regulations. Corrective actions were filed and approved. Claims were reprocessed and paid with interest. Any co-pays greater than specified limitation were refunded.
Monetary penalty	Failure to submit PNV file timely \$1,750.	12/30/13	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Sanction	Non-compliance with claims adjudication cycle time requirements and provider network adequacy requirements, which originated prior to Humana's acquisition, resulted in AHCA suspending automatic enrollment for select regions within the Florida LTC program for members who were not previously enrolled in an American Eldercare nursing home diversion plan, with no effect to voluntary enrollment in American Eldercare for members in any region.	Q3 2013 - Q2 2014	AHCA	FL	Process and system fixes were implemented to address non-compliance; AHCA reinstated auto-enrollment privileges.
Monetary penalty	Response for complaint documents sent incomplete-deemed late - \$550.	1/30/14	DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	FL HMP, Inc. Exam. FL Office of Insurance Regulation mandated market conduct exam of Humana Medical Plan dated November 2, 2013. In 17 instances the Company did not provide timely acknowledgement of the receipt of out of network claims, in violation of Sections 641.3155(3)(a) and (4)(a), Florida Statutes. Penalty of \$54,000.	2/5/14	DOI	FL	Automation of claims acknowledgement: A critical request was submitted internally to update the system logic to in the claims processing system. To cover the time frame leading up to automation, process documentation utilized by the adjuster for claims adjudication will be updated to reflect steps to manually issue an acknowledgement letter in accordance with FS 641.3155 (4)(a).
Monetary penalty	Failure to achieve the required Federal 80% Participation Ratio for CHCUP - \$25,000	2/7/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Small employer group complaint led to investigation regarding HIC requiring some employers, who purchased small group medical insurance to also purchase a group life insurance product - \$4,200,000.	2/14/14	MO DOI	MO, AL, AR, GA, MS, MT, NC, TN, UT, VA	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Call Center Monitoring - Timeliness Study Fourth Quarter 2013	2/18/14	CMS	FL	Made adjustments to call center routing.
Notice of Non-Compliance	Failure to Provide Valid NPI and/or DEA Prescriber Identifiers on 2012 PDEs	2/28/14	CMS	ME and NH	This issue from Arcadian (an acquisition) was resolved by transitioning to Humana platforms.
Monetary penalty	Failure to comply with Pharmacy Encounter (NCPDP) data submission requirements - \$25,000	3/17/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Deficient member roster facility residence report submission - \$500	3/24/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to adhere to CMS agent/broker compensation rules	3/27/14	CMS	All states plus PR	Developed new compensation policies and implemented system enhancements.
Monetary penalty	Untimely submission of the Provider Complaint Report - \$1,000	3/31/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Untimely submission of Florida TPA Report - \$25	4/7/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Ad Hoc Corrective Action Plan (CAP) without beneficiary impact	Organization received a less than 3 star plan rating for 2014 for H1681, H5416, and H7188.	4/17/14	CMS	All states plus PR	No action required by CMS. Steps already taken to improve operation in areas identified.
Monetary penalty	Failure to achieve minimum performance measure standards as per the Contract - \$47,500	4/21/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Response for complaint documents sent incomplete-deemed late - \$550.	5/6/14	DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Failure to provide report timely to state - \$500.	5/16/14	DOI	NV	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Actuarial Compliance Issues	5/21/14	CMS	All states plus PR	Implemented additional process improvements to ensure Humana follows CMS guidance and requirements in the development, finalization and submission of bids.
Notice of Non-Compliance	CY 2014 Inaccurate ANOC/EOC	5/23/14	CMS	All states excluding PR	Implemented additional controls to validate accuracy of ANOC/EOCs.
CAP	Humana CareSource sign was placed on a Senior Center and Community Action of Southern Kentucky bus. However, bus contains state license plate and is therefore considered a state vehicle. Guidance forbids marketing on state endorsed vehicles so plan was placed on external CAP as a result	5/27/14	KDMS	KY	Marketing vendor was educated about the violation and the vendor removed the marketing and committed to ensure no future violations.
Monetary penalty and interest	TX Claims Underpayment Cited. Penalty and interest of \$3,002 paid.	6/1/14	DOI	TX	\$2799.00 Penalties/ \$203.00 interest paid.
Monetary penalty	Failure to meet plan readiness review deadlines and/or specific plan readiness goals set by the Agency (Provider Network File Submission) - \$1,750	6/6/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to adhere to CMS requirements regarding member Information	6/20/14	CMS	All states excluding NY and PR	Updated process and call scripts to ensure the accuracy of the information the customer service representative gives to a caller.
Warning Letter with Business Plan	Failure to successfully coordinate and implement the Part D benefit and hospice	7/2/14	CMS	All states plus PR - MMP (IL & VA)	Updated systems logic, revised authorization process, and increased monitoring.
Notice of Non-Compliance	Sending out an unapproved OTC form to members. The unapproved letter was automatically inserted upon fulfillment of order	7/17/14	CMS	VA - MMP	CMS approved revised OTC form.
Notice of Non-Compliance	Failure to Adhere to CMS Requirements Regarding Member Information	7/17/14	CMS	All states excluding NY and PR	Updated process and call scripts to ensure the accuracy of the information the customer service representative gives to a caller.
Notice of Non-Compliance	Failure to acquire prior approval on a form used by members for the Over-the-Counter (OTC) catalog benefit.	7/28/14	CMS	IL - MMP	Received CMS approval of revised OTC form.
Notice of Non-Compliance	QHP issuers must be accredited 90 days prior to open enrollment in order to be certified; Humana's accreditation was set to expire prior to open enrollment	8/22/14	CMS	AL, MO, MS, TN, TX	Accreditation certificates were received prior to enrollment and were forwarded to CMS. CMS confirmed that this closed the notices of non-compliance
Monetary penalty	Failure to file report timely - \$550.	9/15/14	DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Notice of Non-Compliance	Failure to Adhere to CMS Requirements Regarding Member Information	9/19/14	CMS	All states, including PR	Updated process and call scripts to ensure the accuracy of the information the customer service representative gives to a caller.
CAP	The 2013 Medicaid Compliance Review conducted by IPRO on behalf of KDMS, Humana CareSource was placed on an external CAPs.	9/22/14	KDMS	KY	Submitted CAP, implemented process changes and additional training. Issue closed.
Monetary penalty	Failure to respond timely to a filing - \$550.	9/25/14	DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to respond timely to a filing - \$550.	9/25/14	DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to notify prior to Material Modification - \$75,000.	9/30/14	DMHC	CA	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to meet the Plan's CAP for the CHCUP for federal fiscal year 2009-2010 - \$36,500	10/2/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	State of MN department of Insurance civil penalty against HDIC due to failure to comply with MN Statutes regarding unearned premium. Penalty of \$50,000.	10/10/14	DOI	MN	Refunded unearned premium to consumers who had requested cancellation
Monetary penalty	Maryland DOI Consent Order stating HDIC Administrative penalty due to policies being sold using unapproved forms for Loyalty Plus Dental Plan product. Penalty of \$108,300 assessed.	10/21/14	DOI	MD	Implemented corrective action plan which was submitted to the MD IA and approved 7/10/15
Monetary penalty	Non-compliance due to improper claims denials specific to the Statewide Inpatient Psychiatric Program (SIPP) claims - \$30,000	10/31/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to respond timely to a filing - \$550.	11/4/14	DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to notify prior to Material Modification - \$25,000.	11/14/14	CA DMHC	CA	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	MCO was not meeting 95% encounters success rate threshold for the month - penalty \$1,000 issued	11/19/14	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit critical incident reporting within 24 hours of notification - \$2,000	11/25/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Kentucky DOI sent CAP to Kentucky Medicaid on December 4, 2014 that it failed to adjudicate 95% of clean claims for third quarter 2013.	12/4/14	DOI	KY	Submitted CAP response, review of performance was done to ensure correction.
Monetary penalty	MO DOI mandated market conduct Investigation of HIC resulted in a penalty due to correspondence sent to 1618 members regarding their policy and premium. Penalty of \$161,800.	12/9/14	DOI	MO	Sent follow-up communication to members correcting misinformation contained in the initial correspondence

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Plan failed to meet requirements for November 2014 encounters submissions - \$18,000.	12/15/14	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit Critical Incident Reporting within 24 hours of notification - \$7,000	12/19/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit critical incident reporting within 24 hours of notification - \$6,000	12/19/14	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Untimely response to an ad hoc documentation request from AHCA (Financial and Encounter Data for FY 2012 and 2013) - \$6,000	1/6/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Action plan deemed non-compliant because AHCA does not accept the Health Network One, Inc. (HN1) model for providing therapy services.	1/9/15	AHCA	FL	Submitted CAP. Compliance concern(s) addressed internally. Issue was closed.
Monetary penalty	Failure to comply with marketing requirements - \$12,500	1/12/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS levied fine for noncompliant encounter submissions for the month of December 2014 - \$17,000.	1/15/15	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to provide an annual report for customers' Universal Life Insurance policies - \$500.	1/16/15	DOI	MD	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit critical incident reporting within 24 hours of notification - \$6,000	1/22/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Deficient submission of the Provider Network File - \$2,500	1/27/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	MD Insurance Commissioner has entered an Order taking disciplinary action against HDIC for failing to provide complainant with the annual report for year 2011. Penalty of \$500.	1/29/15	DOI	MD	No further action needed.
Monetary penalty	Failure to renew FL Health Care Provider Certificate timely - \$20,000.	2/9/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS levied fine for noncompliant encounter submissions for the month of January 2015 - \$18,500.	2/15/15	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	WI OCI issues penalty due to the following: (A) Respondent failed to comply with guidance regarding rate filing requirements. Penalty of \$2,500.	2/17/15	DOI	WI	No further action needed.
Monetary penalty	LA DOI penalty due to Humana charging more for co-pays for chiropractors than it was charging for co-pays for primary care providers. Penalty of \$2,000.	2/23/15	DOI	LA	Humana readjudicated and paid denied claims
Monetary penalty	Untimely submission of the Administrative Subcontractors and Affiliates Report - \$500	3/3/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Failure to submit critical incident reporting within 24 hours of notification - \$500	3/3/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit critical incident reporting within 24 hours of notification - \$2,000	3/3/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS levied fine for noncompliant encounter submissions for the month of February 2015 - \$11,000.	3/15/15	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to file annual form certification - \$550.	3/17/15	DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Failure to achieve the required Participation Ratios for CHCUP	3/24/15	AHCA	FL	Submitted a CAP, and implemented process changes and additional training. Issue closed.
Notice of Non-Compliance	Failure to ensure timely receipt of ANOC/EOC documents to Medicare members for the Contract Year 2015	3/26/15	CMS	PR	Updated process to alleviate a recurrence, including training.
Monetary penalty	UT - administrative penalty for failure to report KY DOI penalty - \$750.	4/1/15	DOI	UT	No further action needed.
Monetary penalty	Failure to report to the Department administrative actions taken against HHP in another jurisdiction - \$1,500.	4/10/15	UT DOI	UT	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	CAP requested to address issues with preventable errors with Encounters being submitted to HFS, specifically issues around claims data and general provider billing errors.	5/1/15	HFS	IL	Response submitted addressing processing improvements put in place.
Ad Hoc Corrective Action Plan (CAP) without beneficiary impact	Failure to comply with CMS CY2015 Bid Instructions	5/5/15	CMS	AL, AR, AZ, CO, DE, GA, HI, ID, IN, IA, KS, KY, LA, MD, MN, MS, MO, MT, NE, NV, NM, NC, ND, OH, OK, OR, PA, SC, SD, TN, TX, UT, VA, WA, and WV	Edited formulas within the bid model and added additional peer review prior to the submission of bids.
Notice of Non-Compliance	CY2015 inaccurate ANOC/EOC	5/18/15	CMS	PR	Sent errata letters and made improvements to validation process.
CAP	Failure to meet contractually required thresholds for resolution of provider appeals	5/19/15	KDMS	KY	Submitted CAP, implemented process changes and additional training. Issue closed.
Warning Letter	CY2015 inaccurate ANOC/EOC	5/20/15	CMS	FL	Sent errata letters and made improvements to validation process.
Monetary penalty	Untimely submission of Provider Termination and New Provider Notification Report. - \$500	5/22/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Failure to submit electronic encounter data test files as required by KDMS in the format referenced in the contract	6/1/15	KDMS	KY	Submitted CAP, implementing process and system fixes to prevent recurrence, CAP response accepted and issue closed.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Failure to meet the minimum standards for CY 2013 HEDIS Performance Measures - \$44,500	6/4/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Non-compliance with credentialing requirements, which require Plans to screen board members and owners of provider entities against sanctions lists during the credentialing and re-credentialing process.	6/22/15	KDMS	KY	Submitted CAP and implemented process enhancements
Monetary penalty	Non-compliant submission of the Provider Network File - \$25,000	6/23/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Plan deemed out of compliance with Americans with Disabilities Act (ADA) requirements - \$2,500	6/30/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	UT - July administrative penalty for failure to report KY DOI penalty - \$750.	7/1/15	DOI	UT	No further action needed.
Monetary penalty	Failure to comply with the Affordable Care Act Primary Care Services Rate Increase Audit - \$2,500	7/9/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Non-compliance with contractual requirements specific to the layout of the Provider Network File	7/23/15	KDMS	KY	Submitted and gained approval of CAP. Issue closed
Notice of Non-Compliance	CMS issued a Notice of Non-compliance (NONC) to Humana for failure to meet certain standards within a Call Center Monitoring and Guidance for Timeliness and Accessibility Study.	7/23/15	CMS	FL and IL	system and process changes implemented
CAP	Results of the Annual External Quality Review Audit - six findings across five areas reviewed	8/10/15	KDMS	KY	Submitted and gained approval of CAP. Issue closed
Monetary penalty	Failure to meet encounters thresholds for July 2015 - \$14,600	8/15/15	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to meet the Childhood Check Up (CHCUP) participation ratio for the 2013-2014 contract year - \$25,000	8/25/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	UT Sept administrative penalty for non compliance with state regulations in regard to grandfathered health insurance plans - \$75,000.	9/1/15	DOI	UT	Conducted outreach to affected employers and sent apology letters; implemented corrective actions to prevent future communication errors
Monetary penalty	Failure to submit Critical Incident Reporting within 24 hours of notification - \$1,000	9/2/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KS DOI Commissioner ordered monetary penalty as result of findings during KS HDIC market conduct exam pertaining to selling of policies to an invalid groups and collecting duplicate association fees. Penalty of \$65,000.	9/11/15	DOI	KS	Refunded duplicate associations fees to impacted membership; all other corrective actions were corrected during the exam period. No further action required.
Monetary penalty	Failure to meet encounters thresholds for August 2015 - \$36,880	9/17/15	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
CAP	Non-compliance with certain network adequacy requirements per the Network Adequacy Report submission.	9/18/15	KDMS	KY	Submitted response and requested additional information from the State, as the State generates this report and there are questions as to the accuracy of the report generation. Response was received and assistance to assist state was provided.
Monetary penalty	Failure to timely file a report with the Commissioner, to include audited financial statement with all requisite schedules as required by NRS 683A.08528(1) - \$500.	9/22/15	NV DOI	NV	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Non-compliance with licensure and appointment requirements for a given marketing representative - \$2,500	9/30/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Deficient submission (improper formatting) of the Participant Direction Option Roster Report - \$1,000	10/1/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Failure to adhere to NOA requirements for payment denials.	10/6/15	AHCA	FL	Implemented system fix, CAP satisfied and closed.
Technical Assistance Letter (Notice of Non-Compliance)	Under 45 CFR 156.122(d) and 156.230(c), issuers offering Qualified Health Plans (QHPs) on the FFM are required to submit provider and formulary data in a machine-readable format to HHS and make this information available on the QHP issuer's website. CMS is unable to access required machine-readable files for plan, provider and formulary information by the specified deadline	10/7/15	CMS	AL, AZ, FL, GA, IL, LA, MI, MO, MS, OH, PA, TN, TX, UT, WI	Corrections were made to server, and CMS confirmed 10/8/15 that the website was working
Notice of Non-Compliance	Failure to timely update online provider networks	10/9/15	CMS	FL, HI, and IA	Made changes to the Provider Directory for the identified PCPs, and for any other inaccurate providers. Developed process to continuously review to change incorrect information in the Provider Directories.
CAP	Non-compliance with claims prompt pay requirements	10/12/15	DOI	KY	Submitted CAP and corrective actions were completed.
Monetary penalty	Failure to meet encounters thresholds - \$28,450	10/14/15	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Incomplete submission of the Enrollee Complaints, Grievances and Appeals Report - \$1,000	10/19/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Untimely submission of the Third Party Liability (TPL) file.	11/2/15	KDMS	KY	Submitted a CAP, subsequent file submissions were timely. Issue closed.
CAP	Received 20 CARs, and 17 ICARs under program audit conducted by the Centers for Medicare & Medicaid Services (CMS) for our Medicare Advantage and Prescription Drug Plan contracts	11/3/15	CMS	All states plus PR - MMP (IL & VA)	Independent Audit conducted to validate remediation efforts and CMS issued an Audit Close Out Notice on 09/08/2016.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
CAP and Monetary Penalty	Non-compliance with contractual timeliness requirements pertaining to member ID card and welcome packet mailings - \$45,000	11/4/15	AHCA	FL	Submitted CAP, settled monetary penalty and issue was closed.
Monetary penalty	Deficient Case Manager Caseload Report submission - \$1,000	11/6/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Failure to meet federally mandated "access and availability" thresholds.	11/9/15	KDMS	KY	Submitted and gained approval of CAP. Issue closed.
CAP and Monetary Penalty	Non-compliant results from an AHCA secret shopping review (of all Florida MMA MCOs) of the Statewide Adult Psychiatry provider network - \$1,000	11/12/15	AHCA	FL	Submitted CAP, settled monetary penalty and closed.
Monetary penalty	Failure to meet encounters thresholds - \$45,795	11/13/15	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Non-compliance with certain contractual network adequacy requirements, specific to the oral surgery specialty.	11/23/15	KDMS	KY	Submitted and gained approval of CAP. Issue closed
Monetary penalty	Violation of 15-209 and 15D-03 of the Insurance Article - \$500.	12/4/15	MD DOI	MD	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA received member complaints about Humana's transportation provider, LogistiCare Solutions, LLC. - \$8,500	12/4/15	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Ad Hoc Corrective Action Plan (CAP) without beneficiary impact	Organization received a less than 3 star plan rating for 2016 for S2874.	12/8/15	CMS	PR	No action required by CMS. Steps already taken to improve operation in areas identified.
Monetary penalty	Failure to meet encounters thresholds - \$33,165	12/15/15	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to use appropriate material types/codes for CY2016 Annual Notice of Change/Evidence of Coverage (ANOC/EOC)	12/18/15	CMS	AL, AR, AZ, CO, FL, GA, ID, IL, IN, IA, KS, KY, MI, MN, MS, MO, MT, NM, NC, ND, OH, OK, OR, PA, SC, SD, TX, VA, WA, WI, and WV	Updated process to include specific filing requirements.
Notice of Non-Compliance	Failure to download enrollment requests via the Medicare Online Enrollment Center (OEC) within the CMS required timeframe. Four delinquent OEC downloads for contract year 2016.	12/22/15	CMS	FL	Updated processes to accept enrollments through the OEC as completed requests and to process enrollment requests on a daily basis.
CAP (Audit Findings)	Findings identified via the September 2015 Virginia MMP External Quality Review - 44 findings across eight standards reviewed	12/29/15	DMAS	VA (MMP)	DMAS approved CAP responses. All gaps were closed.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	\$1000.00 -Kanawha Insurance Company related to incorrect fraud language provided on some application forms \$500.00 - HIC penalty for failure to comply with MD law regarding Med Supp reinstatement	1/5/16	DOI	MD	Discontinued use of unapproved application forms until forms with an updated fraud statement were filed and approved by Commissioner.
CAP	Non-compliance with claims prompt pay requirements	1/8/16	DOI	KY	Submitted CAP and corrective actions were completed.
Notice of Non-Compliance	Failure to meet certain provider network standards in the approved services areas.	1/14/16	CMS	VA (MMP)	Of the two network gaps cited, we have filled one. The other remains open because the only provider available in the area refuses to contract with Humana.
Monetary penalty	Failure to meet encounters thresholds - \$101,740	1/15/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Humana American Eldercare utilized an enrollee letter template which had not been pre-approved by AHCA - \$1,000	2/2/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Market Conduct Exam for 2014 plan year \$ 39,100.	2/3/16	CO DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Market Conduct Exam for 2014 plan year - \$27,600.	2/4/16	CO DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to meet encounters thresholds - \$61,480	2/15/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	A complaint was filed with the Office for Civil Rights alleging that Humana placed all HIV/AIDS medication in the highest cost-sharing formulary tier - \$503,000.	2/17/16	DOI	FL	Humana denied the allegations, but agreed to pay \$503,000 penalty; maintain procedures to ensure it does not treat those living with HIV/AIDS less favorably than any other condition; established an independent market conduct examination separate from litigation department
CAP	The Avesis (plan's dental subcontractor) Draft provider manual noted hours of operation which do not meet contractual requirements for provider services.	2/25/16	KDMS	KY	Submitted and gained approval of CAP. Issue closed.
Notice of Non-Compliance	Failure to comply with the requirement to promptly provide standard terms and conditions for network participation to pharmacies upon request	2/29/16	CMS	All states plus PR	Sent a copy of the standard terms and conditions for Humana retail network pharmacies to the pharmacy regardless of whether they were qualified to join Humana's retail network.
Monetary penalty	Failure to meet encounters thresholds - \$90,350	3/14/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
CAP and Monetary Penalty	Failure to comply with timeliness requirements pertaining to NOA letters for denials, reductions, terminations, or suspensions of services. Findings resulted from AHCA's review of a Medicaid Fair Hearing evidence packet. - \$2,500	3/25/16	AHCA	FL	Submitted CAP and settled monetary penalty. System was updated and associate training was completed. Issue closed.
Notice of Non-Compliance	Failure to timely upload Actual Mail Dates (AMDs) for Contract Year 2016 ANOC/EOC documents	4/1/16	CMS	AL, AR, ID, IN, KY, NE, SC, VA, and WA	Uploaded the date for one missing contract to CMS. Made updates to process and reporting to ensure that the failure to upload does not occur again.
Notice of Non-Compliance	Failure to resubmit Prescription Drug Event (PDE) Data	4/1/16	CMS	TN	Related to an entity acquired by Humana and some PDEs that occurred prior to the closing of the acquisition. There was no formal action required by CMS.
CAP	Non-compliance with claims prompt pay requirements	4/11/16	DOI	KY	Submitted CAP and corrective actions were completed.
Monetary penalty	Failure to meet encounters thresholds - \$50,000	4/13/16	HFS	IL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to meet encounters thresholds - \$265,805	4/13/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Humana American Eldercare self-reported a systematic issue impacting claims processing due to a system migration - \$30,000	4/15/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	CO HIC Amended Penalty - claims handling - Penalty of \$39,100.	4/19/16	DOI	CO	Most of the findings were corrected during the exam period; submitted proof of corrective action plan. Exam closed no further action is required .
Monetary penalty	Non-compliant submission of the Achieved Savings Rebate (ASR) Report. - \$1,000	4/22/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit critical incident reporting within 24 hours of notification - \$500	4/22/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	CO HHP Amended Penalty - claims handling, Penalty of \$27,600.	4/26/16	DOI	CO	Most of the findings were corrected during the exam period; submitted proof of corrective action plan. Exam closed no further action is required .
Monetary penalty	Non-compliant findings resulting from a member record review conducted by Florida's Department of Elder Affairs - \$5,000	4/27/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Inaccuracies within Humana American Eldercare's submission of "Unable to Locate/Contact Enrollee" reports - \$2,000	4/27/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Failure to submit critical incident reporting within 24 hours of notification - \$500	4/27/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Administrative penalty as result of findings during FL Office of Insurance Regulation market conduct exam of Kanawha Insurance Co. Failed to make annual rate certifications timely; used unapproved forms and rates; failed to file forms for information purposes; failed to report suspected fraudulent insurance acts, Penalty of \$182,000.	4/29/16	DOI	FL	All findings were remediated during exam.
Monetary penalty	Untimely submission of the Annual NAIC Health Statement - \$9,000	5/2/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit critical incident reporting within 24 hours of notification - \$500	5/6/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Grace period Investigation penalty MD HIC - Penalty of \$75,600.	5/11/16	DOI	MD	Reprocessed and paid claims along with applicable interest.
Monetary penalty	Failure to meet encounters thresholds - \$122,830	5/16/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Non-compliance with specific access to care requirements, specifically member's inability to access a suboxone clinic.	5/23/16	KDMS	KY	Submitted Corrective Action Plan and response was accepted.
Notice of Non-Compliance	Inaccurate health plan website entered for Humana's Virginia MMP contract in HPMS.	5/25/16	CMS	VA (MMP)	Updated website in HPMS.
Notice of Non-Compliance	Inaccurate health plan website entered for Humana's Illinois MMP contract in HPMS	5/25/16	CMS	IL	Updated website in HPMS.
Monetary penalty	Failure to submit timely response; Failure to provide accurate and complete information - \$5,000.	5/26/16	UT DOI	UT	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to submit timely response; Failure to provide accurate and complete information - \$5,000.	5/26/16	UT DOI	UT	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Inaccurate health plan website entered for Humana's Virginia MMP contract in HPMS.	6/1/16	CMS	VA (MMP)	Updated website address in HPMS and realigned internal responsibilities.
Notice of Non-Compliance	Inaccurate health plan website entered for Humana's Illinois MMP contract in HPMS	6/1/16	CMS	IL (MMP)	Updated website address in HPMS and realigned internal responsibilities.
Monetary penalty	Instances of non-compliance with Notice of Action (NOA) letter timeframes per the Denial, Reduction, Termination or Suspension of Services Report - \$87,500	6/7/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Non-compliance with certain Access and Availability contractual requirements specific to dental providers.	6/8/16	KDMS	KY	Submitted Corrective Action Plan. Implemented additional provider outreach to further educate providers on access and availability contractual requirements/obligations.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Improper processing of behavioral health claims, by Humana's Behavioral Health subcontractor, due to incorrect application of prior authorizations - \$20,000	6/8/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to meet encounters thresholds - \$117,905	6/14/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Failure to recognize updates from the Third Party Liability (TPL) Resource File.	6/14/16	KDMS	KY	A targeted audit was completed and additional training was conducted.
Monetary penalty	LA DOI has fined Kanawha Insurance Co because they failed to respond to the Dept's revised directive 205. Fine of \$2,000.	6/14/16	DOI	LA	Penalty paid. No further action needed.
Monetary penalty	TX Denticare findings related to Provider recredentialing, provider notifications, provider directory, QIPs, documentation of complaints and appeals, timeliness of claims payments, etc. Penalty of \$50,000.	6/14/16	DOI	TX	Recredentialing process was made timely; network, claims, directory and G&A process improvements implemented.
Monetary penalty	Failure to meet established thresholds for encounter submissions - \$50,000	6/17/16	HFS	IL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Non-compliance with provider network adequacy requirements specific to Adult Psychiatry and Child Psychiatry specialties- \$20,000	6/17/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Instances of non-compliance per the Enrollee Complaints, Grievances and Appeals report - \$2,000	6/21/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to respond to 2016 Medicare Supplement Survey - \$575.	6/24/16	CO DOI	CO	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Instances of noncompliance per the Enrollee Complaints, Grievances and Appeals report - \$500	6/27/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Penalty CO HIC - failure to submit Final Agency Order signed by each member of the Board of Directors. Fine of \$575.	6/29/16	DOI	CO	No further action needed.
Monetary penalty	Penalty CO HHP - Failure to submit Final Agency Order signed by each member of the Board of Directors. Fine of \$575.	6/29/16	DOI	CO	No further action needed.
Monetary penalty	Failure to meet the Prompt Pay Standards under KRS 304.99 -123(2) - \$5,500.	6/30/16	KY DOI	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Assessed \$7000 in civil penalties for failure to meet claims prompt pay thresholds for Q3 2015.	6/30/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to meet encounter thresholds - \$114,275	7/14/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Instances of noncompliance per the Enrollee Complaints, Grievances and Appeals report submitted by Humana on May 15, 2016 - \$1,000.	7/25/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Failure to notify of a network outage of its subcontractor, which impacted providers and members.	7/26/16	KDMS	KY	Submitted CAP and corrective actions were completed.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
CAP	Failure to notify of a network outage of its subcontractor which impacted providers and members.	7/26/16	KDMS	KY	Submitted CAP and corrective actions were completed.
CAP	Provider attempted contact several times regarding claims that needed to be voided.	7/28/16	KDMS	KY	Submitted CAP and corrective actions were completed.
CAP	KDMS converted the Letter of Concern into a Corrective Action Plan (CAP) regarding the Encounters Void Process.	7/29/16	KDMS	KY	Submitted Corrective Action Plan. Implemented education to providers and associates. Process improvements were made. All was implemented and issue closed.
Monetary penalty	Failure to meet encounters thresholds - \$11,895.	8/15/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Provider Services, Delegations of Authority, and Monitoring Requirements response to LOC turned into a CAP.	8/22/16	KDMS	KY	Submitted CAP and corrective actions were completed.
Monetary penalty	Instances of noncompliance per the Enrollee Complaints, Grievances and Appeals report - \$500.	8/23/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	In March 2016, Humana sent letters to a large population of their fully insured members advising that a recently filled prescription wasn't FDA approved, and as such, not covered by their plan. The letters were inadvertently sent to members indicating that certain FDA approved drugs were not FDA approved - \$10,000.	8/30/16	TDI	TX	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Ad Hoc Corrective Action Plan (CAP) without beneficiary impact	Failure to comply with Part D requirements concerning the representation of its contracted pharmacy network on its website and maintain the required Special Needs Plan (SNP) Pharmacy websites for all but 1 SNP plan.	8/31/16	CMS	All states plus PR	Web issues corrected
Monetary penalty	TX Commissioner of Insurance disciplinary action against HHP of TX for letters sent incorrectly regarding Rx. Penalty of \$10,000.	9/7/16	DOI	TX	Corrective action plan was submitted and approved by TDI. Exam closed.
Monetary penalty	Civil Money Penalty - Failure to provide enrollees with Medicare benefits in accordance with CMS requirements specific to Part D formulary and benefit administration and Part C and Part D organization/coverage determination, appeal, and grievance - \$3,100,900	9/8/16	CMS	All states plus PR	Updated systems and beneficiaries now have access at the pharmacy as needed. In addition, Humana updated Grievance and Appeals policies and procedures and implemented additional process changes. Associates receive training on the requirements and new reporting mechanisms are in place to monitor all cases.
Monetary penalty	Failure to send a Notice of Action timely for a standard service authorization decision - \$2,500.	9/9/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Non compliance with Third Party Liability (TPL) process and management for a member.	9/22/16	KDMS	KY	Submitted CAP and corrective actions were completed.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Noncompliant encounter submissions - \$7,835.	9/23/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to meet disconnect rate during the third quarter (Q3) of the 2016 review specific to Part C and Part D current enrollee beneficiary customer service phone lines.	10/3/16	CMS	All states plus PR	Additional monitoring and training initiated.
Monetary penalty	Failure to renew timely - \$25,000.	10/7/16	SD DOI	SD	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Noncompliant encounter submissions for the month of September 2016 -\$15,395.00.	10/17/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to meet claims prompt pay thresholds for Q4 2015 - \$7,500.	10/18/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to download enrollment requests via the Medicare Online Enrollment Center (OEC) within the CMS required timeframe	10/21/16	CMS	FL	Updated monitoring process
CAP	Vendor mistakenly terminated a provider and failed to notify Humana - CareSource which meant that subsequently the Department and affected Members were not contacted.	10/25/16	KDMS	KY	Submitted CAP and corrective actions were completed.
Monetary penalty	Failure to provide a list of documents requested by CPA Carr, Riggs & Ingram, LLC - \$2,500.	10/31/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Incorrect information given to a Provider with regards to an appeal the Provider wanted to file.	11/2/16	KDMS	KY	Submitted CAP detailing process improvements and enhanced monitoring. Issue closed.
Monetary penalty	TX CompBenefits penalty related to Prompt Pay warning letter. Penalty of \$25,000.	11/2/16	DOI	TX	Compbenefits change their process on how they report the number of clean claims numbers
Monetary penalty	Did not meet the minimum standards for the CY 2015 HEDIS performance measures, or the CHCUP screening rate of at least 80% for enrollees who are continuously enrolled for at least 8 months during the federal fiscal year (10/1-9/30). Liquidated damages were assessed, \$130,000 2014 - 2015 FFY Child Health Check-Up \$515,400 - CY 2015 HEDIS TOTAL: \$645,400	11/10/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to meet the minimum standards for CY 2015 Long-Term Care performance measures - \$316,600.	11/18/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	TPL process- including not meeting deadlines for submitting resource files, including member information not being updated timely and not providing the Department information timely - 0.25% of monthly capitation payment.	11/21/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Encounter submissions for the month of October 2016 - \$45,568.00.	11/22/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to properly adjudicate Medicare Part D drug claims as determined by Formulary Administration Analysis (FAA)	12/1/16	CMS	All states plus PR	Reviewed quality assurance procedures regarding POS drug claim adjudication and qualified prescription drug coverage.
Monetary penalty	TX Denticare Enforcement Action penalty regarding Prompt Pay. Areas cited were Compliance Reporting, Claims, and Provider Relations. Penalty of \$75,000.	12/2/16	DOI	TX	Denticare changed their processes on how it reports clean claims and is now in compliance.
Monetary penalty	Sold product to association that was not a bona fide association as defined in 33-22-501 - \$7,500.	12/14/16	MT CSI	MT	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Noncompliant encounter submissions for the month of November 2016 - \$151,046.00.	12/15/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to meet MMP Medicare network standards in its approved service area. Specifically, Humana has coverage gaps for Orthopedic Surgery, Mammography, and Outpatient Infusion/Chemotherapy in Lake County.	12/19/16	HFS	IL	Response submitted. Due to unwilling Providers, network gaps are not able to be filled. Due to the sunset of the program on 12/31/2017 this was closed.
Notice of Non-Compliance	Failure to demonstrate adequate network sufficient to provide all enrollees with access to the full range of Covered Services.	12/19/16	CMS	IL (MMP)	Due to unwilling Providers, some network gaps are not able to be filled.
Notice of Non-Compliance	Failure to demonstrate adequate network sufficient to provide all enrollees with access to the full range of Covered Services.	12/19/16	CMS	VA (MMP)	Due to unwilling Providers, some network gaps are not able to be filled.
Notice of Non-Compliance	Failure to meet MMP Medicare network standards in the approved service area. Specifically, Humana has coverage gaps for ENT/Otolaryngology, Gastroenterology, General Surgery, Pulmonology, Urology, and Cardiothoracic Surgery in Bedford County, ENT/Otolaryngology and General Surgery in Bedford City, Cardiac Surgery Program in James City, Gastroenterology in Northampton County, Cardiac Surgery Program in Williamsburg City, and Cardiac Surgery Program in York County.	12/19/16	CMS	VA (MMP)	Response submitted. Due to unwilling Providers, network gaps are not able to be filled. Due to the sunset of the program on 12/31/2017 this was closed.
Monetary penalty	Failure to submit a response to a Letter of Concern within 2 business days following the date of the written deficiency notice - \$500.	12/20/16	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to update its online provider directory to match its most recent Provider Network file submitted to the agency - \$1,000.	12/27/16	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Warning Letter	Failure to maintain accurate online provider directories	1/6/17	CMS	WI	Verified inaccuracies updated for contract
Monetary penalty	Failure to comply with encounter data submission requirements regarding timeliness - \$1,000.	1/13/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Transportation provider arriving late to pick up an enrollee which resulted in the enrollee missing their appointment - \$2,500.	1/13/17	AHCA	FL	Monetary penalty settled with regulator. The vendor was put on a CAP and completed the remediation plan.
Monetary penalty	Deficiencies found in its long-term care case record review (Submission 13) - \$161,500. June 9, 2017 the damages were reduced from \$161,500 to \$151,000.	1/13/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Noncompliant encounter submissions for the month of December 2016 - \$85,514.00.	1/17/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Montana State Auditor's Office Final Agency Order. HDIC did not file forms/rates in MT as required and then issued policies - \$7,500 fine.	1/18/17	DOI	MT	Obtained form approvals; implemented corrective action plans.
Monetary penalty	Failure to request prior approval to delegate services to two vision service contractors - \$25,000.	2/1/17	AHCA	FL	Monetary penalty settled with the regulator. Issue was remediated with process improvements and ongoing tracking of delegate services.
Monetary penalty	Failure to report a fine on the TPA renewal - \$500.	2/3/17	OH DOI	OH	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	TX Department of insurance administrative penalty assessment against HIC due to violation of TX insurance code regarding premium increases. Penalty of \$75,000.	2/6/17	DOI	TX	Revised grandfathered policy forms to include missing disclosure and refunded overpaid premiums.
Notice of Non-Compliance	Failure to submit complete and accurate final bid at time of submission.	2/14/17	CMS	AL, AR, AZ, CO, FL, GA, IL, IN, IA, KS, KY, MI, MN, MS, MO, MT, NM, NC, ND, OH, OK, OR, PA, SC, SD, TX, VA, WI, WV	Requested plan corrected and updated process
Monetary penalty	Noncompliance encounter submissions for the month of January 2017 - \$126,020.	2/17/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Incorrectly denying claims for family planning services because they did not contain a prior authorization number. The dates of services were between August 29, 2016 and October 26, 2016 for thirty-nine claims. Fine of \$10,000.	2/23/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages in the amount of \$1,000 per occurrence due to the average timeliness for Humana's encounter data submitted for the week of January 9, 2017 to January 15, 2017 being greater than 7 days following the date of adjudication as required by the Contract.	3/1/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Review of the Denial, Reduction, Termination or Suspension of Services reports identified that a total of 6 enrollees received Notices of Action that were not provided within the timeframes as specified in the contract - \$15,000.	3/13/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to provide notice of a material modification in a timely manner - \$50,000.	3/14/17	CA DMHC	CA	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Noncompliant encounter submissions for the month of February 2017 - \$254,121.96.	3/20/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failed to meet call center timeliness standards during the first quarter (Q1) of 2017 for Part D current enrollee beneficiary customer service.	3/23/17	CMS	All states	Remediated root causes for after hours failures to answer/ not pick-up incoming calls
CAP	Failure of Beacon Health Options call center between January 9 and 10, 2017 and HCS was not clear how many members or providers were impacted or what steps were to be taken to mitigate future outages.	3/28/17	KDMS	KY	Education was provided to Beacon regarding obtaining complete impact to members and/or providers. CAP was submitted, corrective actions were completed and issue closed.
Monetary penalty	Failure to comply with March Encounter Data Submissions \$33,902.00	4/17/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to timely notify of material modification - \$25,000.	4/19/17	CA DMHC	CA	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to update online and printed provider directories - \$1,000.	4/20/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to send Integrated Denial Notice (IDN) letters with correct State Fair Hearing address	4/26/17	CMS	VA (MMP)	Established a quality audit process prior to production to prevent recurrence.
Monetary penalty	Failure to timely file a TPA report - \$500.	5/16/17	NV DOI	NV	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP and Monetary Penalty	When inputting certain search terms into search engines, searchers are directed to Humana CareSource. It is indicated that this was a pattern of marketing abuses.	5/16/17	KDMS	KY	Discontinued Digital Marketing for KY Medicaid product. Issue closed.
Notice of Non-Compliance	Failure to comply with the Part D Recovery Audit Contractor (RAC) program requirements concerning the timely resubmission of Prescription Drug Event (PDE) data prior to the re-opening specified.	5/16/17	CMS	All states	Reviewed process for submitting corrected PDEs.
Monetary penalty	Failure to comply with April Encounter Data Submissions - \$46,945.00	5/18/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Result of the 2017 IPRO Compliance Audit due to the failure of disclosure information to members when there is a provider investigation.	5/24/17	KDMS	KY	Submitted CAP detailing process improvements and updated the resolution letter.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
CAP	Failure to correctly process an appeal in regard to a prior authorization denial for Baptist Health Louisville until the provider contacted DMS for an external independent review.	5/24/17	KDMS	KY	Submitted CAP detailing process improvements of a new PO BOX created to assist with priority. Corrective actions were completed.
Monetary penalty	Failure to timely report violations in the access, use and disclosure of PHI or timely report a security incident or timely make a notification of breach or notification of provisional breach - \$12,500.	5/26/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to expedite the delivery of information as directed by the Department - \$5,000.	6/9/17	CA DMHC	CA	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to file Annual Quality of Health Care Report-2016 - \$1,000.	6/9/17	NV DOI	NV	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to correctly upload the Provider Network File Humana submitted - \$250.	6/9/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Ad Hoc Corrective Action Plan (CAP) without beneficiary impact	Organization received a less than 3 star plan rating for 2017 for H6859.	6/13/17	CMS	PA	No action required by CMS. Steps already taken to improve operation in areas identified.
Monetary penalty	Failure to comply with May Encounter Data Submissions \$254,266.27	6/23/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages of \$10,000 due to an issue loading eligibility information pertaining to the behavioral health subcontractor, Beacon, which resulted in behavioral health claims denying incorrectly for services rendered in March 2017.	7/14/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to Timely File a Report with the Commissioner as Required by NAC 683.A125 TPA Notice of Change - \$500.	7/18/17	Nevada Department of Business and Industry, Division of Insurance	NV	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to comply with June Encounter Data Submissions - \$260,851.56	7/21/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages of \$2,500 for failure to provide an enrollee long term care services for two months (Nov and Dec 2016). Humana confirmed that services were not provided. Liquidated damages of \$2,500 were assessed by AHCA in a letter to Humana dated 7/21/2017.	7/21/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
CAP	Failure to meet the July 1, 2017 deadline for Provider Payment Suspension Process.	7/24/17	KDMS	KY	Submitted CAP detailing process improvements and enhanced monitoring. State accepted response. Monitoring occurred with no issues found, issued closed.
CAP	Failure to update policies and procedures on the payment suspension process by July 1, 2017	7/24/17	KDMS	KY	Submitted CAP detailing process improvements and enhanced monitoring. State accepted response. Monitoring occurred with no issues found, issued closed.
CAP	Failure to correctly process an appeal for behavioral health services by a member until the provider contacted the Department.	8/9/17	KDMS	KY	Policies and Procedures were updated on future submissions of appeals to be able to identify and route appeals timely and appropriate. The new policies were trained to associates in August 2017. Remediation completed and issue was closed.
Monetary penalty	Failure to comply with July Encounter Data Submissions \$254,188.00	8/16/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Failure to meet the requirement that it shall enroll at least one (1) Federally Qualified Health Centers (FQHCs) and one (1) Rural Health Clinic into its network for each region where available and at least one teaching hospital. Network Adequacy report form May 2017 does not reflect any Federally Qualified Health Centers (FQHCs) for regions 1, 4, 6, and 7.	8/17/17	KDMS	KY	Response submitted and accepted. FQHCs were enrolled; however, it was discovered the report that went to the state was not accurate. Remediations were completed on the report and Issue closed.
CAP and Monetary Penalty	Failure to meet contact standards for a member and failure to request member's termination from waiver services - \$25,000.	8/23/17	HFS	IL	Monetary penalty settled with the regulator. Additional oversight was implemented and CAP was remediated.
Monetary penalty	Multiple violations found during an HHPTX Triennial Quality of Care examination. Penalty of \$140,000.	9/4/17	DOI	TX	HHPTX letter processes and language were updated, claims and G&A staff coached on proper processes to follow, and process for CAP submission clarified.
Monetary penalty	Failure to comply with August Encounter Data Submissions - \$129,451.00	9/18/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Contractual violations in accordance with Section 28.9 Provider Grievances and Appeals - \$5,000.	9/19/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Resurrection Treatment Clinics indicating they submitted claims for repricing to subcontractor Beacon and then the claims were lost prior to submission.	9/28/17	KDMS	KY	Response submitted and accepted. Remediations were completed and Issue closed.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	Liquidated damages of \$50,000 for failure to meet the Encounter thresholds.	10/9/17	HFS	IL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to comply with September Encounter Data Submission requirements regarding timeliness - \$2,000.	10/11/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to comply with September Encounter Data file submissions \$269,650.45.	10/20/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$5,000 in liquidated damages (LD) for not processing home birth claims correctly.	10/25/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$2,000 in liquidated damages (LD) for failure to update the plan online provider directory for adult psychiatrists in region 11.	10/25/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$500 in liquidated damages (LD) for failure to timely report violations. The privacy breach involved 1 member and was due to a mobile app spoofing incident.	11/14/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to comply with October encounter file submissions \$79,341	11/21/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$1,000 in liquidated damages (LD) for failure to update the plan online provider directory for adult psychiatrists in region 11. Humana continued to have discrepancies between PNV file and online provider directory.	12/1/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$500 in liquidated damages (LD) for discrepancies found on the Physician Compensation Schedule for Q2 2017 on the Humana Q2 2017 Achieved Savings Rebate (ASR) Financial Report.	12/1/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Complaint previously received from Provider Ethan Health regarding claims between Beacon and HCS were not reprocessed.	12/7/17	KDMS	KY	Response submitted and accepted. Remediations were completed.
Monetary penalty	AHCA assessed the plan liquidated damages in the total amount of \$1,347,100.00 for not meeting minimum standards for the CY 2016 HEDIS performance measures (\$1,217,100) and the FFY 2015-2016 CHCUP measures (\$130,000).	12/8/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages of \$13,000 as Humana did not meet the minimum standards for the calendar year 2016 LTC performance measures.	12/8/17	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	HFS sent notification that it will assess liquidated damages of \$50,000 for failure to meet the Encounter thresholds for Evaluation Period 4.	12/18/17	HFS	IL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
CAP	KDMS issued a CAP regarding a Provider Enrollment being incomplete and not processed.	12/20/17	KDMS	KY	Response submitted and accepted. Remediations were completed by updating policy and procedures. Issue closed.
Monetary penalty	Failure to comply with November encounter file submissions \$89,2015	12/20/17	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS issued a CAP on Philip J Morris Chiropractic clinic. The Chiropractic clinic withdrew from network since 3/18/2016; however, is still listed in the directory.	1/3/18	KDMS	KY	Response submitted and accepted. Remediation was completed.
Monetary penalty	AHCA assessed liquidated damages of \$1,000 for failure to update online provider directory for adult psychiatrists in Region 11 on November 9, 2017 report.	1/4/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS issued a CAP regarding Eastside Elementary complaint regarding claims rejected and provider representative communication discrepancy.	1/5/18	KDMS	KY	Response submitted and accepted. Policies and procedures were created and implemented.
CAP	KDMS issued a CAP regarding provider complaint Premier Surgery Center regarding recouping twice from the provider.	1/9/18	KDMS	KY	Response submitted and accepted. Remediations were completed.
Monetary penalty	AHCA assessed liquidated damages of \$2,500 for failure to provide one enrollee a notice of adverse benefit determination.	1/12/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP and Monetary Penalty	AHCA assessed liquidated damages of \$90,000 and corrective action plan for multiple complaints from hospice, skilled nursing facility and assisted living facility for incorrectly denying claims for no authorizations when providers obtained authorization.	1/12/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan liquidated damages in the total amount of \$1000 for failure to file accurate Provider Complaint Report.	1/19/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS issued a CAP regarding Sunrise Children's Services for a DMS complaint from Sunrise Children's Services stating payments to their providers were erroneously sent to another provider.	1/26/18	KDMS	KY	Response submitted and accepted. Remediations were completed.
Monetary penalty	AHCA assessed liquidated damages in the amount of \$1000 for plan failure to file accurate reports (failure to include 45 physicians license numbers), specifically the MPIP Provider List.	1/26/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$1,500 in liquidated damages (LD) for failure to file an accurate ECGA report and failure to comply with the enrollee notice requirements.	1/26/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to comply with December encounter file submissions \$97,288	1/29/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	AHCA assessed the plan Liquidated Damages of \$101,000 for the PNV files for failing to meet the provider network standards.	1/29/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages of \$73,500 regarding long term care case records were non-compliant with the requirements of the contract.	2/2/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Warning Letter with Business Plan	Failure to properly execute a transition program according to transition policy requirements as identified through CMS' Transition Monitoring Program Analysis (TMPA) project.	2/7/18	CMS	FL, KY, MS, NC, OR	Claims processing logic was updated to adequately document ongoing drug therapy.
Monetary penalty	Failure to respond timely to a provider complaint, penalty \$2,500.	2/8/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to respond timely to requests for DBHDID MCO Quarterly Meeting Data, penalty \$13,000	2/8/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS converted a Letter of Concern into a CAP regarding communication on resolving claims and complaints between Humana - CareSource and Beacon.	2/12/18	KDMS	KY	Response submitted and accepted. Remediation was completed.
Monetary penalty	AHCA assessed liquidated damages of \$10,000 for claims processing deficiencies on the Q3 2017 Claims Aging Report.	2/12/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Failed to notify DMS regarding a planned outage on December 22, 2017.	2/14/18	KDMS	KY	Response submitted and accepted. Remediations were completed.
Monetary penalty	Failed to meet the Credentialing standards set forth by the NCQA. Penalty of \$50,000.	2/15/18	DOI	TX	No further action needed.
Monetary penalty	AHCA assessed the plan Liquidated Damages of \$2,000 for discrepancies between the PNV files and the online provider directory.	2/16/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages of \$500 for failure to file a LTC critical incident report.	2/26/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan Liquidated Damages of \$5,000 for failure of LogistiCare to provide transportation services in a timely manner.	3/6/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS converted a Letter of Concern into CAP regarding a complaint from Murray Calloway Hospital on outstanding claims over 90 days old.	3/9/18	KDMS	KY	Response submitted and state accepted response. Remediations were completed.
Monetary penalty	AHCA assessed liquidated damages of \$39,000 for failure to comply with Provider Network Standards – Regional Provider Ratios.	3/15/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to comply with January encounter file submissions \$116,674	3/16/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to comply with February encounter file submissions \$184,019	3/16/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	AHCA assessed liquidated damages of \$4,000 for failure to file accurate reports and to comply with the notice requirements for complaints, grievances and appeals (Enrollee Complaint, Grievances and Appeals Report).	3/16/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages of \$30,000 for failure to comply with claims processing requirement regarding crossover claims being process incorrectly.	3/27/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages of \$1,000 for failure to update the online directory- February 2018 (adult Psych).	3/27/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	Failure to meet one or more call center timeliness standards during Q1 of 2018.	3/29/18	CMS	FL	Developed process/procedure to correct hold time issue and ensure proper education/training takes place to prevent future occurrence.
CAP	Failure to notify KDMS of a notification going to providers regarding Urinary Drug Testing services no longer covered.	4/2/18	KDMS	KY	Response submitted and processes were updated. KDMS reviewed the urinary drug policies with each MCO.
CAP	Failure to interpret state fee schedule for a provider's incontinence supplies.	4/4/18	KDMS	KY	Response submitted and accepted. The fee schedule was updated and claims were reprocessed.
Monetary penalty	AHCA assessed the plan \$1,000 in liquidated damages (LD) for failure to file accurate reports (MPIP Data).	4/10/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$8,000 in liquidated damages (LD) for failure of providing contract to comply with requirement of the Contract (Hospital Rates).	4/13/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$30,000 in liquidated damages (LD) for incorrect denials of therapy service claims.	4/18/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to comply with March encounter file submissions \$161,699	4/20/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages of \$4,000 for failure to file accurate reports.	4/20/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$5000 in liquidated damages (LD) for failure to comply with marketing events reporting requirements.	4/25/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS issued a CAP stating Humana CareSource received an External Review request from Manchester hospital and HCS notified DMS 19 days after request is received.	4/26/18	KDMS	KY	Response submitted and accepted. Policies and procedures were updated, a dedicated fax line was created and training was completed.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	AHCA assessed the plan \$38,000 in liquidated damages (LD) for failure to comply with provider network standards (Regional Provider Ratios).	4/30/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$3000 in liquidated damages (LD) for failure to comply with encounter data submission requirements regarding timeliness.	5/4/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$2000 in liquidated damages (LD) for failure to update provider directory (Adult Psych).	5/4/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$250 in liquidated damages (LD) for failure to submit a provider network file that meets the Agency's specifications.	5/4/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP and Monetary Penalty	Failure to comply to monitor and having oversight of Vendor. Penalty, one quarter of one percent (.25%) of monthly capitation payment until corrective action accepted and completed.	5/9/18	KDMS	KY	Response submitted and accepted. A remediation plan of Beacon oversight was implemented which included moving processing of Behavioral Health claims to Beacon. Monthly updates were provided to KDMS. Penalty was retained by KDMS.
CAP	KDMS issued a CAP stating Manchester Hospital received an appeal denial from MCO dated January 22, 2018 for claims. The same provider received a second letter dated March 15, 2018 denying a second appeal for the same claim.	5/15/18	KDMS	KY	Response submitted and accepted. Humana CareSource updated appeal language on denial letters and updated procedures.
Monetary penalty	Failure to comply with April encounter file submissions \$278,213	5/25/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	June 2018 Texas Fine - HIC and HHPTX self-reported systemic error in payment of certain orally administered anticancer medication. Penalty of \$60,000.	6/6/18	DOI	TX	Humana implemented a corrective action plan, sent notification letters to all impacted members, along with refunds and interest.
Monetary penalty	AHCA assessed the plan \$133,500 in liquidated damages (LD) for long term case record review deficiencies.	6/12/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to respond timely to a provider complaint, penalty \$500.	6/15/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to comply with May encounter file submissions \$270,372	6/15/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$500 in liquidated damages (LD) for failure to timely report violations in the access, use and disclosure of PHI or timely report and a security incident or timely make a notification of breach.	6/18/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$38,000 in liquidated damages (LD) for failure to submit a provider network file that meets the Agency's specifications.	6/21/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
CAP	KDMS issued a CAP stating Humana has had several missed deadlines in relation to Department requests.	7/11/18	KDMS	KY	Response submitted and accepted. Remediations were completed.
Monetary penalty	Failure to comply with June encounter file submissions \$15,815	7/25/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to comply with June encounter file submissions \$388,382	8/18/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$250 in liquidated damages (LD) for failure to submit a provider network file that meets the Agency's Specification.	8/27/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	CMS issued a Notice of Non-Compliance (NONC) for failure to submit timely enrollments for the Online Enrollment Center (OEC) download on July 9, 2018.	8/31/18	CMS	All states	Humana isolated system break and developed a monitoring and oversight process that triggers an immediate review should a file not be transferred.
Monetary penalty	Failure to comply with July encounter file submissions \$324,564	9/14/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$27,000 in liquidated damages (LD) for failure to comply to provide transportation to 7 members.	9/19/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS issued a CAP stating Humana did not educate provider after conducting a postpayment and prepayment review.	9/21/18	KDMS	KY	Response submitted and accepted. Humana CareSource updated policies and procedures to ensure timely education is conducted with the provider.
Monetary penalty	AHCA assessed the plan \$1,750 (\$250 per occurrence) in liquidated damages (LD) for failure to comply with the enrollee notice requirements.	9/25/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$12,000 in liquidated damages (LD) for failure to comply with claims processing requirements for Transportation Medicare Crossovers January 2017-October 2017, all claims were reprocessed January 2018.	9/28/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP and Monetary Penalty	AHCA assessed the plan \$50,000 in liquidated damages (LD) for failure to comply with claims processing requirements for Hospice Services.	9/28/18	AHCA	FL	Submitted CAP. Compliance concern(s) addressed internally. Monetary penalty settled with the regulator. Issue was closed.
Monetary penalty	AHCA assessed the plan \$101,000 in liquidated damages (LD) for failure to comply with provider network standards for Regional provider ratios.	10/1/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	CMS issued a Notice of Non-Compliance (NONC) for the failure to properly adjudicate Medicare Part D drug claims	10/15/18	CMS	IL & MN	Enhanced testing procedures for benefit builds to ensure appropriate set up prior to the start of a new plan year.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	ACA claims and compliance violations - \$77,750.	10/18/18	IL DOI	IL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS assessed a total penalty of \$284,760 for September encounter file submissions.	10/19/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS assessed a penalty of \$3,000 for a late response update on CAP HU2018HHP-1.	10/23/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	HIC \$53,000; HHP \$24,750; Total penalty of \$77,750 for MCE year 2014 ACA claims and compliance violations	10/24/18	DOI	IL	Submitted the penalty check of \$77,750, and proof of compliance with CAPs to the Illinois DOI.
CAP	KDMS issued a CAP HU2019SME-1 stating the department has received complaints regarding member eligibility information not being accurately maintained in the system for Humana CareSource's subcontractor, Avesis. The error has caused interruption of services for members and providers inability to verify the member eligibility.	10/31/18	KDMS	KY	Response submitted and accepted. CareSource and Avesis created a new file transfer to ensure correct member data is transferred.
Monetary penalty	AHCA assessed the plan \$2,000 (\$1,000 per data set - PCP, PDO) for failure to file accurate reports –COC Data Sharing.	11/7/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan \$3,000 for LTC Performance Measures (CY 2017) pertaining to contract #FP023.	11/7/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed the plan for \$1,528,000 (CY2017 MMA Hedis Performance Measures \$1,348,000 and FFY 2016-2017 CHCUP \$180,000) for MMA PM and CHCUP pertaining to contract #FP023.	11/7/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Arcadian Health Plan was charged \$5,000 for not meeting the deadline to expand into two underserved counties in Iowa by the contract year 2019	11/13/18	DOI	ID	Penalty paid. Arcadian has requested and received from Idaho an extension to expand into outlined counties by contract year 2020.
Monetary penalty	KDMS assessed a total penalty of \$263,365 for October encounter file submissions.	11/16/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	CMS issued a Notice of Non-Compliance (NONC) for inaccurate information distributed in Marketing/Communication materials	11/16/18	CMS	All states	Established new end-to-end processes to validate product detail and geographically accurate messaging across marketing materials.
Notice of Non-Compliance	CMS issued a Notice of Non-Compliance (NONC) for the failure Non-compliance related to Part C Hold Time and Part D Hold Time	11/16/18	CMS	PR	Transitioned to new Call Center vendor; assigned liaison to assure compliance with metrics, ensure effective communication with Humana operational areas, and communicate changes to processes that may affect customer service.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	HIC failure to maintain an adequate network of facility based anesthesiologists, failure to notify members of decrease in network, and failure to file an access plan with TDI. Penalty of \$350,000.	11/18/18	DOI	TX	HIC filed an access plan for anesthesia services on 8/31/18. Humana's facility-based anesthesiology network with an access plan was certified adequate on 9/28/18.
Monetary penalty	HHPTX failure to maintain an adequate network of facility based anesthesiologists, failure to notify members of decrease in network, and failure to file an access plan with TDI. Penalty of \$350,000.	11/18/18	DOI	TX	HHPTX filed an access plan for anesthesia services on 8/31/18. Humana's facility-based anesthesiology network with an access plan was certified adequate on 9/28/18.
CAP	HFS requested a CAP, as a result of continued findings related to the quarterly HCBS record reviews - On-site record review from Q1 SFY18 through Q2 SFY19 identified the following continued non-compliance with contract requirements. The sampled cases reviewed during SFY18 and SFY19 (Q1 and Q2) did not contain documentation of the waiver service validation process, including (ILS) There was no evidence of a standard oversight process that required ILS care coordination staff to validate waiver services, and there was no evidence of review of claims data to validate service delivery.	11/30/18	HFS	IL	Response to CAP provided to HFS. Remediation was completed and CAP was closed.
Monetary penalty	HIC failed to offer replacement coverage in 2015 for discontinued plans. HIC had advised TDI that Humana's Bronze plan would be available off-exchange to all policyholders affected by the discontinuation. HIC failed to timely respond to information request from TDI. Penalty of \$100,000.	12/3/18	DOI	TX	Letters were sent to effected members offering Bronze plan and extending deadline to enroll.
Monetary penalty	KDMS assessed a total penalty of \$308,542.07 for November encounter file submissions.	12/21/18	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	CMS issued a Notice of Non-Compliance for the failure to oversee and distribute accurate materials for beneficiary education	12/21/18	CMS	All states	Sent approved corrective notices to all impacted beneficiaries. Identified increased opportunities for additional validation and checkpoints. Re-educated all team members on existing processes.
Monetary penalty	AHCA assessed liquidated damages \$176,500 for LTC Case Records Review Deficiencies -submission 19 and 20.	12/28/18	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Warning Letter	CMS issued a Warning Letter for inaccurate Marketing/Communication regarding Cost Plans Exiting	1/2/19	CMS	All states	Sent approved corrective notices to all impacted beneficiaries. Identified increased opportunities for additional validation and checkpoints. Re-educated all team members on existing processes.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	TX Penalty of \$115,000 total on HHPTX and HIC for failure to timely respond to information request and improper claim denials of vaccination claims	1/11/19	DOI	TX	Claims were reprocessed and paid with interest.
CAP and Monetary Penalty	KDMS issued a CAP and assessed \$5,000 stating the Department did not receive confirmation of completion, but through an inquiry found that the payments were not complete until 12/10/2018. Due to missed completion date and the amount of time that has passed, the Department is requesting a detailed plan outlining how this issue was corrected.	1/15/19	KDMS	KY	Response submitted and accepted. Monetary Penalty settled with the regulator. Provided KDMS with procedures updated to ensure deadlines are met.
Monetary penalty	KDMS assessed a total penalty of \$215,592 for December encounter file submissions.	1/18/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages \$3,750 for failure to comply with enrollee notice requirements (Enrollee, Grievances and Appeals Report 2nd and 3rd Quarter, 2018).	2/15/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages \$10,000 (calculated \$500 per day) for failure to comply with fraud and abuse provisions.	2/15/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages for failure to timely report violations in the Access, Use and Disclosure of PHI. The LD amount is \$25,500 calculated at \$500 per enrollee.	2/15/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS assessed a total penalty of \$215,298 for January encounter file submissions.	2/15/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS issued a CAP stating Department forwarded a complaint for provider Mountain Comprehensive Care Center due to finding six sets of issues related to the complaint involving Beacon.	2/25/19	KDMS	KY	Reponse was sent to KDMS and providers concerns were resolved.
Notice of Non-Compliance	Failure to meet one or more actuarial requirements in submitting the 2019 Medicare Advantage and/or Part D bids	2/28/19	CMS	National (excluding NY & PR)	Implementing additional process improvements to ensure Humana follows CMS guidance and requirements in the development, finalization and submission of bids.
Monetary penalty	UT DOI Penalty assessed for failure to pay a valid claim. Involving provider payment and refund. Fine of \$2,500.	3/1/19	DOI	UT	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS assessed a total penalty of \$185,791 for February encounter file submissions.	3/26/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS issued a CAP stating the Department that Humana's subcontractor, Avesis, was withholding a copayment on dental claims.	4/2/19	KDMS	KY	Reponse was sent to KDMS and accepted.
Monetary penalty	AHCA assessed liquidated damages for failure to report timely by one day of a critical incident. The LD amount is \$500.	4/15/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	KDMS assessed a total penalty of \$272,549 for March encounter file submissions.	4/19/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	TN Insurance Division assessed penalty on Humana Pharmacy Solutions for failure to pay claims at MAC cost. Penalty of \$25,000.	4/21/19	DOI	TN	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS issued a CAP stating the Department continues to receive numerous complaints from providers regarding non-payment or insufficient payment, outstanding claims, poor communications, credentialing, etc.	4/23/19	KDMS	KY	Response was sent to KDMS and accepted.
Monetary penalty	AHCA assessed liquidated damages for failure to timely report for violations in the access, use and disclosure of PHI. The LD amount was \$500.	4/23/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages for failure to timely report a critical incident that was reported to Humana on April 8, due to AHCA on April 9, but not reported until April 10. The LD amount was \$500.	5/10/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	CMS issued a Notice of Non-Compliance (NONC) for the failure to adhere to regulatory requirements regarding excluded providers.	5/10/19	CMS	FL	Updated online and hard copy provider directories. Implementing safeguards to timely identify and remove excluded providers from internal network. Enhancing current processes and re-training associates
Notice of Non-Compliance	CMS issued a Notice of Non-Compliance (NONC) for the failure to adhere to marketing requirements.	5/15/19	CMS	TX	Updated Summary of Benefits and uploaded revised version into HPMS. Updated website to include the correct Summary of Benefits.
Monetary penalty	AHCA assessed liquidated damages for failure to comply with claims processing requirements (Newborn Screening Claims). The LD amount was \$10,000.	5/16/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	CMS issued a Notice of Non-Compliance (NONC) for the failure to meet the CMS standard for the disconnect percentage rate.	5/16/19	CMS	All states	Developing processes/procedures to remedy the issue and prevent recurrence.; establishing oversight and monitoring efforts to provide timely insight into performance (i.e. daily reports)
Monetary penalty	KDMS assessed a total penalty of \$16,243 for April encounter file submissions.	5/20/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages for failure to timely report a critical incident timely- \$26,000.	5/21/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS assessed a total penalty of \$41,034 for May encounter file submissions.	6/19/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	AHCA assessed liquidated damages for failure to timely file a long term care critical incident report. The LD amount was \$500.	7/8/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Humana is in violation of the Prompt Pay Act for its failure to meet the standards for the payment of clean claims as set forth in KRS 304.99-123(2); - \$5,500.	7/11/19	KY DOI	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS assessed a total penalty of \$41,635 for June encounter file submissions.	7/19/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages for failure to comply with provider network standards for May 2019 - \$9,000	7/25/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages for long term care record review deficiencies - \$75,500.	7/30/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	Failure to timely report violations in the access, use and disclosure of PHI - \$500.	7/31/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	KDMS issued a CAP stating the Department continues to receive a complaint from a provider regarding not being participating.	8/5/19	KDMS	KY	Response was sent to KDMS, corrected loading of the provider and reprocessed claims.
CAP and Monetary Penalty	KDMS issued a CAP and penalty stating the Department received an External Review exceeding the five day notification period - \$8,500.	8/5/19	KDMS	KY	Response submitted and Monetary Penalty settled with the regulator.
Monetary penalty	KDMS assessed a total penalty of \$35,572 for July encounter file submissions.	8/16/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages for failure to be present at a market event that was originally planned and the state was not notified of the change - \$500.	8/22/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS assessed a total penalty of \$1500 for responding three days late in notifying the Department of an external review.	9/9/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS assessed a total penalty of \$62,462 for August encounter file submissions.	9/18/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages for a late submission of a Long Term Care critical incident report in the amount of \$500.00	9/24/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	KDMS assessed a total penalty of \$115,696 for September encounter file submissions.	10/18/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages for failure to comply with enrollee notice for denials, reductions, terminations or suspension of services in the amount of \$13,500.	11/5/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA assessed liquidated damages for Long Term Care case record review deficiencies in the amount of \$500.	11/8/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.

Regulatory Sanction	Description	Date Issued	Issuing Entity	State(s) in Which the Non-Compliance Was Issued	Resolution
Monetary penalty	KDMS assessed a total penalty of \$72,099 for October encounter file submissions.	11/11/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
CAP	Failure to score at least 80% on one must pass element	12/3/19	NCQA	FL	Issue was self-identified and remediated prior to CAP receipt. CAP submitted and pending acceptance.
Monetary penalty	AHCA assessed liquidated damages for inaccurate or incorrect system information resulting in inappropriate adjudication of claims/incorrect payment - \$116,400.	12/9/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA Assessed liquidated damages for failure to comply with provider network standards and filing inaccurate reports regarding Pediatric Therapists providers- \$21,000.	12/16/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Notice of Non-Compliance	CMS issued a Notice of Non-Compliance for inaccurate information distributed within marketing materials.	12/18/19	CMS	WI	Process changes and training for market and vendors
CAP	KDMS issued a Corrective Action Plan stating the Department's previous Letter of Concern response was cited with the following deficiencies: prepayment removal is not in the Provider Manual or notification letter. The notification letter mentions denial of claims, but does not mention appeal rights.	12/18/19	KDMS	KY	Response was sent to KDMS and accepted. Updates were made to prepayment letters and process documents.
Monetary penalty	KDMS assessed a total penalty of \$153,182 for November encounter file submissions.	12/18/19	KDMS	KY	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA Assessed liquidated damages for review of long term care case records revealed that records were non-compliant - \$1,500.	12/19/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA Assessed liquidated damages for failure to comply with provider network standards - \$14,000.	12/20/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA Assessed liquidated damages for failure to comply with Enrollee notice for denials, reductions, terminations or suspension of services - Long Term Care reports - \$2,500.	12/20/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.
Monetary penalty	AHCA Assessed liquidated damages for failure to update online provider directory (ad hoc). Amount is \$1,000.	12/20/19	AHCA	FL	Monetary penalty settled with the regulator. Compliance concern(s) addressed internally.