



An Anthem Company

Jason O'Malley
Regional Vice President, Sales

15 Plaza Drive
Latham, NY 12110
(518) 713-6190

Jason.O'Malley@.empireblue.com

January 24, 2022

Ms. Andrea Inman, Audit Director
Office of the New York State Comptroller
110 State Street
Albany, NY 12236

Re: OSC Follow-up Audit 2021-F-17

Dear Ms. Inman:

We reviewed the final report for Follow-up Audit 2021-F-17 and appreciate the opportunity to respond. For the remainder of this response, we will refer to Empire BlueCross as "Empire" and the Office of the New York State Comptroller as "OSC". Please note that for purposes of this response we are only addressing recommendations 1, 4 and 5 as they are focused on action items where Empire maintained primary responsibility.

Recommendation #1: *Review the \$4.6 million (\$3.5 million + \$1.1 million) in claims paid for ineligible members and make recoveries as warranted.*

Status- Partially Implemented

As of January 3, 2022, Empire has recovered \$1,426,909.69 which includes claims identified prior to and during the audit. In our response to OSC's Final Report for Audit 2019-S-32, Empire advised we initiated recoveries on 760 claims where Empire agreed with OSC's findings. There are open recovery requests for 92 claims, and it is uncertain if any additional recoveries will occur due to contractual timeframes and the audit period spans back more than (6) years.

We will continue to update OSC on the status of recoveries associated with this audit on a quarterly basis.

We value OSC's acknowledgement of the corrective steps Empire has taken based on the recommendations from Audit 2019-S-32 and appreciate recognition of the controls Empire already had in place or implemented based on the "Implemented" status of recommendations 4 and 5. We are committed to continually improve the service we provide to the State of New York and appreciate the partnership we have with your office. Thank you for the courtesy extended throughout the audit process.

Sincerely,

A handwritten signature in black ink that reads "Jason O'Malley". The signature is written in a cursive, flowing style.

Jason O'Malley
Regional Vice President, Sales
Empire BlueCross

Cc: Ms. Angela Blessing, Empire BlueCross
Ms. Janna Liberty, Empire BlueCross