



February 24, 2022

State of Nevada Public Employees Benefits Program

To whom it may concern,

Below is the Willis Towers Watson (WTW) response to the recommendations from Claim Technologies Incorporated (CTI) to the Audit of the State of Nevada Public Employees' Benefits Program Health Reimbursement Arrangement for the period of July 2020-June 2021:

Recommendation #1:

The overpayment report provided by Via Benefits' should specify the reason for overpayments. If the reasons are not currently captured and tracked, CTI recommends doing so. Tracking the reason for overpayments will allow both the PEBP and Via Benefits to understand why overpayments occur and help determine the steps necessary to prevent them going forward.

WTW Response:

The Overpayment Report does identify the type of overpayment that was created in two categories as described below.

- "Negative Account Balance" - In many cases these overpayments happen due to a late notification that the participant has passed away so funding is removed from the

account and claims paid from those funds are then denied and placed into overpayment. This can also happen if a participant has a retroactive loss of their HRA funding qualification.

- “Claims Overpayment” - These overpayments can be tied a claim that was approved but then later determined to be an ineligible expense, for example a claim that was later identified a duplicate claim.

Our current overpayment report does not provide more detailed information on why a specific overpayment occurred on an account. Manual research would need to occur on the individual participant to confirm the specific reason for an overpayment. WTW is currently working on reviewing improvements on the reports that we can provide to clients related to the HRA. One of those reports under review is the Overpayment report, however we are currently unable to confirm if additional detail can be added to the report at this time.

Recommendation #2:

Via Benefits and LifeWorks need to work together to determine how to best update eligibility in a timely manner. Via Benefits reported 146 members with a negative account balance for a total of \$67,561.82

Response:

Nevada PEBP has changed their data vendor from LifeWorks to BenefitFocus effective for 2022. WTW has been working with BenefitFocus on the eligibility and HRA files that we need to receive to manage participant data. Part of this process is to improve the timing of when the files are scheduled to be sent to help expedite account updates. Many of the negative account balances identified by CTI can occur due to a death status update. This means that WTW will not be updated with the death status until after Nevada PEBP is updated and then WTW receives the update via the file. We are hopeful that the new files we will receive from BenefitFocus will allow us to receive account updates more timely to help minimize accounts having negative account balances due to a late notification of a deceased status.

One item to note is that WTW is currently working on a tool called OneView that would allow clients and authorized Third Party Eligibility Administrators to access/review/and edit participant account information in real time without having to send a file. This tool would be designed to help resolve/update an account that is an escalation due to a data issue and could be ideal to help resolve an update of a deceased status on an account. OneView is currently in development and is expected to be live in 2023, though access may be rolled in out phases.

Recommendation 3:



Via Benefits should coach examiners on the claim processing errors identified during the audit:

- Overlooked charges in claim file
- Incorrect amount entered
- Incorrect date of service entered
- Allowed payment under incorrect benefit type

WTW Response:

WTW’s Claims Manager has confirmed that claim processors are coached on all identified errors, and we have shared the report broadly with the onshore team.

Recommendation 4:

Via Benefits should develop a process to track claim turnaround time.

WTW Response:

WTW’s Claims Manager has confirmed that we do have a process to track turnaround time (TAT).

- We have several controls to monitor aging inventory on a daily and weekly basis through reporting and dashboards
- We receive reports monthly and determine Service Level Agreements quarterly
- We do not have a “TAT on demand” type of report as the above controls eliminate the need

Recommendation 5:

Performance Guarantee Metrics included in PEBP’s contract with Via Benefits should be measurable to allow for outside validation of the metric being met.

WTW Response:

WTW has confirmed the following related to the Performance Guarantees included in PEBP’s contract with Via Benefits being measurable for outside validation.

Please note that Dawn Nisius from Claims Technologies Incorporated advised that this recommendation did not apply to the claims focused Performance Guarantees since those were measurable as part of the audit.

Metric	Comments on Reporting Validation
--------	----------------------------------



Claim Processing Turnaround Time	This metric is already measurable as part of the HRA Audit.
Claim Financial Precision	This metric is already measurable as part of the HRA Audit.
Claim Processing Payment Precision	This metric is already measurable as part of the HRA Audit.
Reports	This metric cannot be validated by a TPA as the reports are either 1) automatically generated at the end of each month and made available in BenefitView, or 2) run on demand by Nevada PEBP through BenefitView.
HRA Web Services	WTW's Reporting Manager has advised that the data for these reports can be provided for review by a TPA for future HRA Audits.
Benefits Administration Customer Service Call Center Abandon Rate	WTW's Reporting Manager has advised that the data for these reports can be provided for review by a TPA for future HRA Audits.
Benefits Administration Customer Service Average Speed to Answer	WTW's Reporting Manager has advised that the data for these reports can be provided for review by a TPA for future HRA Audits.
Customer Satisfaction	WTW's Reporting Manager has advised that the data for these reports can be provided for review by a TPA for future HRA Audits.
Disclosure of Subcontractors	This metric cannot be validated by a TPA outside of reviewing emails that the WTW Client Service Manager sends to Nevada PEBP.
Unauthorized Transfer of PEBP Data	This metric cannot be validated by a TPA as this item would only come up if there was an unauthorized transfer of PEBP Data and notification was provided to Nevada PEBP accordingly.

Recommendation 6:

PEBP should verify that missed performance goals have been credited back to the plan.

WTW Response:



Nevada PEBP will need to respond to this recommendation item.

We appreciate the partnership with Claim Technologies Incorporated and the State of Nevada Public Employees' Benefits Program and look forward to building on a strong audit for last plan year.

Sincerely,

Cara Smouse

Cara Smouse
Senior Associate-Client Operations

10975 S Sterling View Dr
South Jordan, UT 84095

T +1 801-415-0561
Cara.Smouse@extendhealth.com
W wtwco.com

Willis Towers Watson US LLC