# Payment Year 2019 Contract-Specific Risk Adjustment Data Validation Questions and Answers

Last Updated June 25, 2025

#### Introduction

The Centers for Medicare & Medicaid Services (CMS) conducts contract-specific risk adjustment data validation (RADV) audits to confirm that enrollees' medical diagnoses, submitted by Medicare Advantage organizations (MAOs) for risk adjusted payment, are supported by medical record documentation. When unsupported diagnoses are identified, it could lead to CMS making overpayment determinations and collecting overpayments from MAOs.

Below are answers to frequently asked questions about the Payment Year (PY) 2019 Medicare Advantage (MA) contract-specific RADV audit. CMS may periodically update this document to add and/or clarify questions and answers. Please review the log at the end of this document for a history of updates made.

#### **Questions and Answers**

#### Q1: When did CMS initiate PY 2019 RADV audits?

A1: CMS initiated the first and second batches of PY 2019 RADV audits on June 12, 2025, and June 25, 2025, respectively, when it sent notices in the Health Plan Management System (HPMS) to points of contact for selected MA contracts.

#### Q2: How long will it take to complete PY 2019 RADV audits?

A2: CMS expects to begin issuing PY 2019 audit findings by early 2026.

#### Q3: What will be audited during the PY 2019 contract-specific RADV audits?

A3: The PY 2019 RADV audits will focus on risk adjusted payments, made to MAOs for the 2019 coverage year, that CMS believes may be at higher risk for overpayments. Risk adjusted payments for PY 2019 were derived from diagnoses from face-to-face medical encounters with dates of service from January 1, 2018, through December 31, 2018. CMS selects samples of enrollees within the audited MA contracts and request medical records from MAOs to confirm that diagnoses submitted by MAOs to receive risk adjustment payments are supported by medical record documentation.

#### Q4: Who reviews the medical record documentation submitted by MAOs?

A4: CMS tasks certified medical record coders to perform the intake and diagnosis code abstraction reviews of medical records in support of RADV audits.

# Q5: What recourse does an MAO have if it disagrees with audit results communicated by CMS in a final audit report?

A5: An MAO that disagrees with MA RADV audit results has up to sixty (60) days to appeal medical record review determinations and/or payment error calculations included in an issued audit report. More information about the MA RADV appeals process is found in regulations at 42 CFR 422.311 (c).

Q6: If an MAO believes it submitted a transaction(s) in the past to CMS to delete a diagnosis code(s) related to a CMS-HCC that has been selected in its RADV audit sample, how should the MAO proceed? Should the MAO submit a medical record(s) to CMS before the MR submission deadline to substantiate the audited CMS-HCC?

A6: CMS advises that the MAO submit a valid medical record for each audited CMS-HCC selected in the audit sample. Given the timing of when PY 2019 RADV audits were initiated, CMS will refresh sampling frame data prior to calculating PY 2019 RADV audit results to ensure the accuracy of overpayment calculations. If a diagnosis code was deleted by the MAO prior to the relevant overpayment data submission deadline for the payment year rerun, and the removal of the diagnosis code resulted in the deletion of the CMS-HCC from risk adjusted payment calculations, then CMS will grant an administrative exception for the CMS-HCC included in the RADV audit sample.

#### Q7: Which MA contracts were selected in the first batch of PY 2019 CMS RADV audits?

A7: CMS selected the following 45 MA contracts in the first batch of PY 2019 RADV audits:

| Parent Organization             | Contract ID | Contract Name                                 |
|---------------------------------|-------------|---|
| American Health Companies, Inc. | H3708       | Oklahoma Superior Select, Inc.                |
| Associated Care Ventures, Inc.  | H4091       | Simpra Advantage, Inc.                        |
| Cambia Health Solutions, Inc.   | H1997       | Regence BlueShield                            |
| Cambia Health Solutions, Inc.   | H3817       | Regence BlueCross BlueShield of Oregon        |
| Cambia Health Solutions, Inc.   | H5009       | Regence BlueShield                            |
| Cambia Health Solutions, Inc.   | H5010       | Asuris Northwest Health                       |
| CenterLight Health System, Inc. | H5989       | CenterLight Healthcare, Inc.                  |
| Community Care, Inc.            | H2034       | Community Care Health Plan, Inc.              |
| Elderplan, Inc.                 | H3347       | Elderplan, Inc.                               |
| Elevance Health, Inc.           | H5431       | HealthSun Health Plans, Inc.                  |
| Elevance Health, Inc.           | H5471       | Simply Healthcare Plans, Inc.                 |
| Henry Ford Health System        | H2354       | Health Alliance Plan of Michigan              |
| Horizon Mutual Holdings, Inc    | H8298       | Horizon Healthcare of New Jersey, Inc.        |
| Humana Inc.                     | H1951       | Humana Health Benefit Plan of Louisiana, Inc. |
| Humana Inc.                     | H3533       | Humana Health Company of New York, Inc.       |
| Humana Inc.                     | H4007       | Humana Health Plans of Puerto Rico, Inc.      |
| Humana Inc.                     | H4141       | Humana Employers Health Plan of Georgia, Inc. |
| Humana Inc.                     | H5216       | Humana Insurance Company                      |
| Humana Inc.                     | H5525       | Humana Benefit Plan of Illinois, Inc.         |
| Humana Inc.                     | H5970       | Humana Insurance Company of New York          |
| Humana Inc.                     | H6622       | Humana Wi Health Organization Insurance Corp  |

| Humana Inc.                       | H8908 | Humana Medical Plan of Michigan, Inc.              |
|-----------------------------------|-------|--|
| Independence Health Group, Inc.   | H4227 | Vista Health Plan, Inc.                            |
| InnovaCare Inc.                   | H4003 | MMM Healthcare, LLC                                |
| InnovaCare Inc.                   | H4004 | MMM Healthcare, LLC                                |
| InnovaCare Inc.                   | H7522 | MMM Healthcare, LLC                                |
| Johns Hopkins Healthcare LLC      | H3890 | Hopkins Health Advantage, Inc.                     |
| Liberty Healthcare Insurance      | H6351 | Liberty Advantage, LLC                             |
| Mercy Care                        | H5580 | Mercy Care   |
| Missouri Healthcare Advisors, LLC | H4172 | NHC Advantage, LLC                                 |
| Molina Healthcare, Inc.,          | H5823 | Molina Healthcare of Washington, Inc.              |
| Molina Healthcare, Inc.,          | H5926 | Molina Healthcare of Michigan, Inc.                |
| Orange County Health Authority    | H5433 | Orange County Health Authority                     |
| PacificSource                     | H3864 | PacificSource Community Health Plans               |
| Rifkin Managed Care Holding, LLC  | H8067 | Provider Partners Health Plan, Inc.                |
| SCAN Health Plan                  | H5425 | Scan Health Plan                                   |
| UnitedHealth Group, Inc.          | H2406 | UnitedHealthcare Insurance Company                 |
| UnitedHealth Group, Inc.          | H3749 | UnitedHealthcare of Oklahoma, Inc.                 |
| UnitedHealth Group, Inc.          | H4527 | Physicians Health Choice of Texas, LLC             |
| University of Maryland Medical    | H8854 | University of Maryland Health Advantage, Inc.      |
| System Corporation                |       |  |
| Village Care of New York, Inc.    | H2168 | Village Senior Services Corporation                |
| WellCare Health Plans, Inc.       | H0174 | Wellcare of Texas, Inc.                            |
| WellCare Health Plans, Inc.       | H1032 | Wellcare of Florida, Inc.                          |
| WellCare Health Plans, Inc.       | H2816 | American Progressive Life & Hlth Ins Company of NY |
| WellCare Health Plans, Inc.       | H5475 | Meridian Health Plan of Michigan, Inc.             |

### CMS selected the following 310 MA contracts in the second batch of PY 2019 RADV audits:

| Parent Organization           | Contract ID | Contract Name                           |
|-------------------------------|-------------|---|
|                               |             |   |
| AHMC Central Health LLC       | H5649       | Central Health Plan of California, Inc. |
| AIDS Healthcare Foundation    | H5852       | Aids Healthcare Foundation              |
| ATRIO Health Plans            | H3814       | Atrio Health Plans                      |
| ATRIO Health Plans            | H5995       | Atrio Health Plans                      |
| ATRIO Health Plans            | H6743       | Atrio Health Plans                      |
| ATRIO Health Plans            | H7006       | Atrio Health Plans                      |
| Alignment Healthcare USA, LLC | H3815       | Alignment Health Plan                   |
| AllCare Health, Inc.          | H3810       | AllCare Health Plan, Inc.               |
| AlohaCare                     | H5969       | AlohaCare                               |
| Aultman Health Foundation     | H3664       | AultCare Health Insuring Corporation    |
| AvMed, Inc.                   | H1016       | AvMed, Inc.                             |
| Aware Integrated, Inc.        | H2425       | Blue Plus                               |
| BMC Health System, Inc.       | H9585       | Boston Medical Center Health Plan, Inc. |
| Banner Health                 | H4931       | Banner - University Care Advantage      |

| Baylor Scott & White Holdings                      | H2032   | Insurance Company of Scott and White         |
|--|---------|--|
| Baystate Health, Inc.                              | H8578   | Health New England, Inc.                     |
| Blue Cross & Blue Shield of Rhode                  | H4152   | Blue Cross & Blue Shield of Rhode Island     |
| Island   | П4152   | Blue Cross & Blue Shield of Rhode Island     |
| Blue Cross Blue Shield of Arizona                  | H0302   | Modisup Inc                                  |
|  |         | Medisun, Inc.                                |
| Blue Cross Blue Shield of Michigan                 | H5883   | Blue Care Network of Michigan                |
| Mutual Ins. Co.                                    | 110572  | DCDC of Mishing Marked Incomes Comment       |
| Blue Cross Blue Shield of Michigan Mutual Ins. Co. | H9572   | BCBS of Michigan Mutual Insurance Company    |
|  | 112170  | Comphine Edge Inc                            |
| Blue Cross Blue Shield of Nebraska                 | H3170   | Sapphire Edge, Inc.                          |
| Blue Cross and Blue Shield of                      | H2230   | BCBS of Massachusetts HMO Blue, Inc.         |
| Massachusetts, Inc.                                | 112264  | DCDC of Manage through LIMAC Blood Line      |
| Blue Cross and Blue Shield of                      | H2261   | BCBS of Massachusetts HMO Blue, Inc.         |
| Massachusetts, Inc.                                | 112404  | Discoursed Discoursed No. 11. Constitution   |
| Blue Cross and Blue Shield of North                | H3404   | Blue Cross and Blue Shield of North Carolina |
| Carolina   | 112440  | Phys Crees and Phys Chiefd of North Courts   |
| Blue Cross and Blue Shield of North                | H3449   | Blue Cross and Blue Shield of North Carolina |
| Carolina   | 114.250 | Di Como filido Com Bloodor                   |
| Blue Cross of Idaho Health Service,                | H1350   | Blue Cross of Idaho Care Plus, Inc.          |
| Inc.   | 110000  |  |
| BlueCross BlueShield of South                      | H8003   | BlueCross and BlueShield of South Carolina   |
| Carolina (BCBSSC)                                  | 112250  | Web at a Class Health Bloom                  |
| BlueCross BlueShield of Tennessee                  | H3259   | Volunteer State Health Plan                  |
| BlueCross BlueShield of Tennessee                  | H7917   | BlueCross BlueShield of Tennessee, Inc.      |
| CAPITAL BLUE CROSS                                 | H3923   | Capital Advantage Insurance Company          |
| CAPITAL BLUE CROSS                                 | H3962   | Keystone Health Plan Central, Inc.           |
| CHRISTUS Health                                    | H1189   | Christus Health Plan                         |
| CVS Health Corporation                             | H0523   | Aetna Health of California Inc.              |
| CVS Health Corporation                             | H1109   | Aetna Health Inc. (GA)                       |
| CVS Health Corporation                             | H1609   | Aetna Health Inc. (FL)                       |
| CVS Health Corporation                             | H1692   | Coventry Health Care of West Virginia, Inc.  |
| CVS Health Corporation                             | H2663   | Coventry Health Care of Missouri, Inc        |
| CVS Health Corporation                             | H3152   | Aetna Health Inc. (NJ)                       |
| CVS Health Corporation                             | H3312   | Aetna Health Inc. (NY)                       |
| CVS Health Corporation                             | H3597   | Aetna Health Inc. (ME)                       |
| CVS Health Corporation                             | H3928   | Aetna Health, Inc. (LA)                      |
| CVS Health Corporation                             | H3931   | Aetna Health Inc. (PA)                       |
| CVS Health Corporation                             | H3959   | Aetna Health Inc. (PA)                       |
| CVS Health Corporation                             | H4523   | Aetna Health Inc. (TX)                       |
| CVS Health Corporation                             | H5521   | Aetna Life Insurance Company                 |
| CVS Health Corporation                             | H5793   | Aetna Health Inc. (CT)                       |
| CVS Health Corporation                             | H7149   | Aetna Health Inc. (PA)                       |
| CVS Health Corporation                             | H7301   | Coventry Health Care of Illinois, Inc.       |
| CVS Health Corporation                             | H8649   | Aetna Health of Utah, Inc                    |
| CVS Health Corporation                             | R6694   | Aetna Life Insurance Company                 |
| California Physicians' Service                     | H0504   | California Physicians' Service               |
| •  | •       |  |

| California Physicians' Service       | H5928  | Blue Shield of California Promise Health Plan   |
|--------------------------------------|--------|---|
| Cambia Health Solutions, Inc.        | H1304  | Regence BlueShield of Idaho                     |
| Cambia Health Solutions, Inc.        | H1969  | Regence BlueShield of Idaho                     |
| Cambia Health Solutions, Inc.        | H4605  | Regence BlueCross BlueShield of Utah            |
| Cambia Health Solutions, Inc.        | H6237  | Regence BlueCross BlueShield of Oregon          |
| Capital District Physicians' Health  | H3388  | Capital District Physicians' Health Plan, Inc.  |
| Plan, Inc.                           | 113333 | Capital District Hysicians Treatment and Inc.   |
| Capital District Physicians' Health  | H5042  | CDPHP Universal Benefits, Inc.                  |
| Plan, Inc.                           |        |   |
| CareOregon, Inc.                     | H5859  | Health Plan of CareOregon, Inc.                 |
| CareSource                           | H6396  | CareSource                                      |
| Centene Corporation                  | H0062  | Superior HealthPlan Community Solutions, Inc.   |
| Centene Corporation                  | H0351  | Health Net of Arizona, Inc.                     |
| Centene Corporation                  | H0562  | Health Net of California, Inc.                  |
| Centene Corporation                  | H0908  | Buckeye Community Health Plan, Inc.             |
| Centene Corporation                  | H1436  | Absolute Total Care, Inc.                       |
| Centene Corporation                  | H2174  | Trillium Community Health Plan                  |
| Centene Corporation                  | H3561  | Health Net Community Solutions, Inc.            |
| Centene Corporation                  | H5190  | Sunshine State Health Plan, Inc.                |
| Centene Corporation                  | H5294  | Superior Health Plan, Inc.                      |
|                                      | H5439  |   |
| Centene Corporation                  | +      | Health Net Life Insurance Company               |
| Centene Corporation                  | H6815  | Health Net Health Plan of Oregon                |
| Centene Corporation                  | H7173  | Peach State Health Plan, Inc.                   |
| Centene Corporation                  | H8189  | Managed Health Services, Wisconsin              |
| Centene Corporation                  | H9287  | Health Net Community Solutions of Arizona, Inc. |
| Centene Corporation                  | H9630  | Arkansas Health and Wellness Health Plan, Inc   |
| Centers Plan for Healthy Living, LLC | H6988  | Centers Plan for Healthy Living, LLC            |
| Chinese Hospital Association         | H0571  | Chinese Community Health Plan                   |
| Clover Health Holdings, Inc.         | H5141  | Clover Insurance Company                        |
| Commonwealth Care Alliance, Inc.     | H2225  | Commonwealth Care Alliance, Inc.                |
| Community Health Plan of             | H5826  | Community Health Plan of Washington             |
| Washington                           |        |   |
| CommunityCare Managed                | H3755  | Community Care HMO, Inc                         |
| Healthcare Plans of OK, Inc.         |        |   |
| Corewell Health                      | H4875  | Priority Health                                 |
| Delaware Life Insurance Company      | H3071  | Community Care Alliance of Illinois, NFP        |
| Delaware Life Insurance Company      | H6672  | Eon Health, Inc. (GA)                           |
| Denver Health and Hospital           | H5608  | Denver Health Medical Plan, Inc.                |
| Authority                            |        |   |
| Elevance Health, Inc.                | H0544  | Blue Cross of California                        |
| Elevance Health, Inc.                | H1607  | Anthem Insurance Companies, Inc.                |
| Elevance Health, Inc.                | H1894  | Amerigroup Washington, Inc.                     |
| Elevance Health, Inc.                | H2593  | Amerigroup Texas, Inc.                          |
| Elevance Health, Inc.                | H3240  | Amerigroup New Jersey, Inc.                     |
| Elevance Health, Inc.                | H3342  | Empire HealthChoice Assurance, Inc.             |
| Elevance Health, Inc.                | H3447  | HealthKeepers, Inc.                             |

| Elevance Health, Inc.              | H3536 | Matthew Thornton Health Plan, Inc.             |
|------------------------------------|-------|--|
| Elevance Health, Inc.              | H3655 | Community Insurance Company                    |
| Elevance Health, Inc.              | H4036 | Anthem Insurance Companies, Inc.               |
| Elevance Health, Inc.              | H4346 | HMO Colorado, Inc.                             |
| Elevance Health, Inc.              | H4909 | Anthem Insurance Companies, Inc.               |
| Elevance Health, Inc.              | H5422 | Blue Cross Blue Shield Healthcare Plan of      |
| ·                                  |       | Georgia  |
| Elevance Health, Inc.              | H5427 | Freedom Health, Inc.                           |
| Elevance Health, Inc.              | H5594 | Optimum Healthcare, Inc.                       |
| Elevance Health, Inc.              | H5854 | Anthem Health Plans, Inc.                      |
| Elevance Health, Inc.              | H7728 | Anthem Health Plans of New Hampshire, Inc.     |
| Elevance Health, Inc.              | H8432 | Empire HealthChoice Hmo, Inc.                  |
| Elevance Health, Inc.              | H8552 | Anthem Blue Cross Life and Health Ins Company  |
| Elevance Health, Inc.              | H9525 | Compcare Health Services Insurance Corporation |
| Elevance Health, Inc.              | R5941 | Anthem Insurance Companies, Inc.               |
| EmblemHealth, Inc.                 | H3330 | Health Insurance Plan of Greater New York      |
| EmblemHealth, Inc.                 | H3528 | Connecticare, Inc.                             |
| EmblemHealth, Inc.                 | H5991 | Health Insurance Plan of Greater New York      |
| EmblemHealth, Inc.                 | H5528 | Group Health Incorporated                      |
| Fallon Community Health Plan, Inc. | H9001 | Fallon Community Health Plan                   |
| FirstHealth of the Carolinas, Inc. | H6306 | FirstCarolinaCare Insurance Company            |
| FirstHealth of the Carolinas, Inc. | H8064 | FirstCarolinaCare Insurance Company            |
| Geisinger Health                   | H3924 | Geisinger Indemnity Insurance Company          |
| Geisinger Health                   | H3954 | Geisinger Health Plan                          |
| Guidewell Mutual Holding           | H1035 | Florida Blue Medicare, Inc.                    |
| Corporation                        |       |  |
| Guidewell Mutual Holding           | H5434 | Blue Cross and Blue Shield of Florida, Inc.    |
| Corporation                        |       |  |
| Guidewell Mutual Holding           | H5938 | Capital Health Plan                            |
| Corporation                        |       |  |
| HTA Holdings, LLC                  | H9808 | Care N'Care Insurance Company of North         |
|                                    |       | Carolina                                       |
| Hawaii Medical Service Association | H3832 | Hawaii Medical Service Association             |
| Health Care Service Corporation    | H0107 | Health Care Service Corporation                |
| Health Care Service Corporation    | H1666 | HCSC Insurance Services Company                |
| Health Care Service Corporation    | H3251 | Health Care Service Corporation                |
| Health Care Service Corporation    | H3822 | Health Care Service Corporation                |
| Health Care Service Corporation    | H3979 | GHS Health Maintenance Organization, Inc.      |
| Health Care Service Corporation    | H8133 | GHS Insurance Company                          |
| Health Care Service Corporation    | H8554 | GHS Insurance Company                          |
| Health Care Service Corporation    | H8634 | Health Care Service Corporation                |
| Health First Shared Services, Inc. | H1099 | Health First Health Plans                      |
| HealthNow New York Inc.            | H3384 | HealthNow New York Inc.                        |
| HealthNow New York Inc.            | H5526 | HealthNow New York Inc.                        |
| HealthPartners, Inc.               | H2422 | HealthPartners, Inc.                           |
| Healthfirst, Inc.                  | H3359 | Healthfirst Health Plan, Inc.                  |

| Henry Ford Health System            | H2322 | Alliance Health and Life Insurance Company       |
|-------------------------------------|-------|--|
| Highmark Health                     | H3916 | Highmark Senior Health Company                   |
| Highmark Health                     | H3957 | Highmark Choice Company                          |
| Highmark Health                     | H5106 | Highmark Senior Solutions Company                |
| Humana Inc.                         | H0028 | CHA HMO, Inc.                                    |
| Humana Inc.                         | H1019 | CarePlus Health Plans, Inc.                      |
| Humana Inc.                         | H1036 | Humana Medical Plan, Inc.                        |
| Humana Inc.                         | H1468 | Humana Benefit Plan of Illinois, Inc.            |
| Humana Inc.                         | H2029 | Humana Insurance of Puerto Rico, Inc.            |
| Humana Inc.                         | H2486 | Humana Medical Plan of Utah, Inc.                |
| Humana Inc.                         | H4461 | Cariten Health Plan Inc.                         |
| Humana Inc.                         | H5619 | Arcadian Health Plan, Inc.                       |
| Humana Inc.                         | H8145 | Humana Insurance Company                         |
| Humana Inc.                         | R0110 | Humana Insurance Company                         |
| Humana Inc.                         | R0865 | Humana Insurance Company                         |
| Humana Inc.                         | R0923 |  |
| Humana Inc.                         |       | Humana Insurance Company                         |
|                                     | R1390 | Humana Insurance Company                         |
| Humana Inc.                         | R1532 | Humana Insurance Company                         |
| Humana Inc.                         | R3392 | Humana Insurance Company                         |
| Humana Inc.                         | R3887 | Humana Insurance Company                         |
| Humana Inc.                         | R4182 | Humana Insurance Company                         |
| Humana Inc.                         | R5361 | Humana Insurance Company                         |
| Humana Inc.                         | R5495 | Humana Insurance Company                         |
| Humana Inc.                         | R5826 | Humana Insurance Company                         |
| Humana Inc.                         | R7220 | Humana Insurance Company                         |
| Humana Inc.                         | R7315 | Humana Insurance Company                         |
| Independence Health Group, Inc.     | H3909 | QCC Insurance Company                            |
| Independence Health Group, Inc.     | H3952 | Keystone Health Plan East, Inc.                  |
| Independent Care Health Plan Inc.   | H2237 | Independent Care Health Plan, Inc.               |
| Independent Health Association,     | H3344 | Independent Health Benefits Corporation          |
| Inc.                                |       |  |
| Independent Health Association,     | H3362 | Independent Health Association, Inc.             |
| Inc.                                |       |  |
| Indiana University Health           | H7220 | Indiana University Health Plans NFP, Inc.        |
| Intermountain Health Care, Inc.     | H1994 | SelectHealth, Inc.                               |
| Itasca County                       | H2417 | Itasca Medical Care                              |
| Johns Hopkins Healthcare LLC        | H1225 | Hopkins Health Advantage, Inc.                   |
| Kaiser Foundation Health Plan, Inc. | H1170 | Kaiser Foundation HP of Ga, Inc.                 |
| Kaiser Foundation Health Plan, Inc. | H1230 | Kaiser Foundation HP, Inc.                       |
| Kaiser Foundation Health Plan, Inc. | H2172 | Kaiser FDTN HLTH Plan of the Mid-Atlantic States |
| Kaiser Foundation Health Plan, Inc. | H5050 | Kaiser Foundation Health Plan of Washington      |
| Kaiser Foundation Health Plan, Inc. | H9003 | Kaiser Foundation Hp of the NW                   |
| Kelsey-Seybold Medical Group,       | H0332 | KS Plan Administrators, LLC                      |
| PLLC                                |       |  |
| Lifetime Healthcare, Inc.           | H3335 | Excellus Health Plan, Inc.                       |
| Lifetime Healthcare, Inc.           | H3351 | Excellus Health Plan, Inc.                       |

| Louisiana Health Service &         | H6453  | HMO Louisiana, Inc.                                   |
|------------------------------------|--------|---|
| Indemnity Company                  |        |   |
| Lumeris Group Holdings Corporation | H2610  | Essence Healthcare, Inc.                              |
| MEDICAL MUTUAL OF OHIO             | H4497  | Medical Mutual of Ohio                                |
| MEDICAL MUTUAL OF OHIO             | H6723  | Medical Mutual of Ohio                                |
| MFA Lifeworks, LLC                 | H2185  | Lifeworks Advantage, LLC                              |
| MHH Healthcare, L.P.               | H3706  | GlobalHealth, Inc.                                    |
| MVP Health Care, Inc.              | H3305  | MVP Health Plan, Inc.                                 |
| MVP Health Care, Inc.              | H9615  | MVP Health Plan, Inc.                                 |
| Magellan Health, Inc.              | H2224  | Senior Whole Health, LLC                              |
| Marquis Companies I, Inc.          | H1372  | Marquis Advantage, Inc.                               |
| Marshfield Clinic Health System,   | H5211  | Security Health Plan of Wisconsin, Inc.               |
| Inc.                               |        | ,   |
| Medica Holding Company             | H2458  | Medica Health Plans                                   |
| Medical Card System, Inc.          | H5577  | MCS Advantage, Inc.                                   |
| Memorial Hermann Health System     | H7115  | Memorial Hermann Health Plan                          |
| Molina Healthcare, Inc.,           | H2879  | Molina Healthcare of Wisconsin, Inc.                  |
| Molina Healthcare, Inc.,           | H5628  | Molina Healthcare of Utah, Inc.                       |
| Molina Healthcare, Inc.,           | H5810  | Molina Healthcare of California                       |
| Molina Healthcare, Inc.,           | H7678  | Molina Healthcare of Texas, Inc.                      |
| Montage Health                     | H8764  | Aspire Health Plan                                    |
| My Choice Wisconsin, Inc.          | H5209  | Care Wisconsin Health Plan, Inc.                      |
| Network Health, Inc.               | H5215  | Network Health Insurance Corporation                  |
| New York City Health and Hospitals | H0423  | MetroPlus Health Plan, Inc.                           |
| Corporation                        |        |   |
| PacificSource                      | H4754  | PacificSource Community Health Plans                  |
| Point32Health, Inc.                | H2256  | Tufts Associated Health Maintenance Organization      |
| Premera                            | H9302  | Premera Blue Cross                                    |
| Presbyterian Healthcare Services   | H3204  | Presbyterian Health Plan                              |
| PrimeWest Rural MN Health Care     | H2416  | PrimeWest Rural MN Health Care Access                 |
| Access Initiative                  | 112410 | Initiative  |
| PrimeWest Rural MN Health Care     | H2926  | PrimeWest Rural MN Health Care Access                 |
| Access Initiative                  | 2320   | Initiative  |
| Promedica Health System, Inc.      | H3653  | Paramount Care, Inc.                                  |
| Providence Health & Services       | H9047  | Providence Health Assurance                           |
| Renown Health                      | H2960  | Hometown Health Plan, Inc.                            |
| Rifkin Managed Care Holding, LLC   | H4093  | Provider Partners Health Plan of Pennsylvania,        |
| RiverSpring Living Holding Corp.   | H6776  | ElderServe Health, Inc.                               |
| SSM Health Care Corporation        | H9096  | Dean Health Plan, Inc.                                |
| Samaritan Health Services          | H3811  | Samaritan Health Plans, Inc.                          |
| Sanford Health                     | H7511  | Good Samaritan Insurance Plan of Nebraska, Inc.       |
| Sanford Health                     | H8967  | Good Samaritan Insurance Plan of North Dakota,<br>LLC |

| Select Founders, LLC               | H1587 | Arkansas Superior Select, Inc.                  |
|------------------------------------|-------|---|
| Sentara Health Care (SHC)          | H2563 | Optima Health Plan                              |
| Sharp Healthcare                   | H5386 | Sharp Health Plan                               |
| South Country Health Alliance      | H2419 | South Country Health Alliance                   |
| South Country Health Alliance      | H5703 | South Country Health Alliance                   |
| St Francis Health System & St John | H4198 | CommunityCare Government Programs, Inc.         |
| Health System                      |       | ,   |
| Steward Health Care System, LLC    | H5587 | Health Choice Arizona, Inc.                     |
| Stonerise Senior Advantage         | H9153 | West Virginia Senior Advantage, Inc.            |
| Holdings, LLC                      |       |   |
| Summa Health                       | H3660 | SummaCare Inc.                                  |
| The Carle Foundation               | H1463 | Health Alliance Connect, Inc.                   |
| The Health Plan of West Virginia,  | H3672 | The Health Plan of West Virginia, Inc.          |
| Inc.                               |       |   |
| The Health Plan of West Virginia,  | H8604 | THP Insurance Company                           |
| Inc.                               |       |   |
| The New York State Catholic Health | H3328 | The New York State Catholic Health Plan, Inc.   |
| Plan, Inc.                         |       |   |
| Thomas Jefferson University        | H9207 | Health Partners Plans, Inc.                     |
| Trinity Health Corporation         | H1846 | Mount Carmel Health Insurance Company           |
| Trinity Health Corporation         | H3668 | Mount Carmel Health Plan, Inc.                  |
| Triple-S Management Corporation    | H4005 | Triple S Advantage, Inc.                        |
| Triple-S Management Corporation    | H5774 | Triple S Advantage, Inc.                        |
| Triton Health Systems, L.L.C.      | H0154 | Viva Health, Inc.                               |
| UCare Minnesota                    | H2456 | UCare Minnesota                                 |
| UCare Minnesota                    | H5937 | UCare Minnesota                                 |
| UNICO Premier, LLC                 | H3291 | PruittHealth Premier, Inc.                      |
| UPMC Health System                 | H3907 | UPMC Health Plan, Inc.                          |
| UPMC Health System                 | H4279 | UPMC For You, Inc                               |
| UPMC Health System                 | H5533 | UPMC Health Network, Inc.                       |
| USAble Mutual Insurance Company    | H4213 | USAble Mutual Insurance Company                 |
| USAble Mutual Insurance Company    | H9699 | HMO Partners, Inc.                              |
| Ultimate Healthcare Holdings, LLC  | H2962 | Ultimate Health Plans, Inc.                     |
| UnitedHealth Group, Inc.           | H0169 | UnitedHealthcare of the Midwest, Inc.           |
| UnitedHealth Group, Inc.           | H0251 | UnitedHealthcare Plan of the River Valley, Inc. |
| UnitedHealth Group, Inc.           | H0294 | Care Improvement Plus Wisconsin Insurance       |
|                                    |       | Company   |
| UnitedHealth Group, Inc.           | H0321 | Arizona Physicians IPA, Inc.                    |
| UnitedHealth Group, Inc.           | H0432 | UnitedHealthcare of Alabama, Inc.               |
| UnitedHealth Group, Inc.           | H0543 | UHC of California                               |
| UnitedHealth Group, Inc.           | H0609 | PacifiCare of Colorado, Inc.                    |
| UnitedHealth Group, Inc.           | H0624 | UnitedHealthcare Insurance Company              |
| UnitedHealth Group, Inc.           | H0710 | Sierra Health and Life Insurance Company, Inc.  |
| UnitedHealth Group, Inc.           | H0755 | Oxford Health Plans (CT), Inc.                  |
| UnitedHealth Group, Inc.           | H1045 | Preferred Care Partners, Inc.                   |
| UnitedHealth Group, Inc.           | H1111 | UnitedHealthcare of Georgia, Inc.               |

| UnitedHealth Group, Inc. | H1286 | UnitedHealthcare of Oregon, Inc.               |
|--------------------------|-------|--|
| UnitedHealth Group, Inc. | H1537 | Care Improvement Plus South Central Insurance  |
|                          |       | Co   |
| UnitedHealth Group, Inc. | H1659 | UnitedHealthcare Insurance Co of the River     |
| •                        |       | Valley   |
| UnitedHealth Group, Inc. | H1944 | UnitedHealthcare of New England, Inc.          |
| UnitedHealth Group, Inc. | H1961 | Peoples Health, Inc.                           |
| UnitedHealth Group, Inc. | H2001 | Sierra Health and Life Insurance Company, Inc. |
| UnitedHealth Group, Inc. | H2226 | UnitedHealthcare Insurance Company             |
| UnitedHealth Group, Inc. | H2228 | UnitedHealthcare Insurance Company             |
| UnitedHealth Group, Inc. | H2802 | UnitedHealthcare of the Midlands, Inc.         |
| UnitedHealth Group, Inc. | H3113 | Oxford Health Plans (NJ), Inc.                 |
| UnitedHealth Group, Inc. | H3307 | Oxford Health Plans (NY), Inc.                 |
| UnitedHealth Group, Inc. | H3379 | UnitedHealthcare of New York, Inc.             |
| UnitedHealth Group, Inc. | H3387 | UnitedHealthcare of New York, Inc.             |
| UnitedHealth Group, Inc. | H3464 | UnitedHealthcare of Arkansas, Inc.             |
| UnitedHealth Group, Inc. | H3794 | Care Improvement Plus Wisconsin Insurance      |
| ,                        | 1.0.0 | Company  |
| UnitedHealth Group, Inc. | H3805 | UnitedHealthcare of Oregon, Inc.               |
| UnitedHealth Group, Inc. | H4514 | UnitedHealthcare Community Plan of Texas,      |
| ,                        |       | L.L.C.   |
| UnitedHealth Group, Inc. | H4590 | UnitedHealthcare Benefits of Texas, Inc.       |
| UnitedHealth Group, Inc. | H4604 | UnitedHealthcare of Utah, Inc.                 |
| UnitedHealth Group, Inc. | H5008 | UnitedHealthcare Insurance Company             |
| UnitedHealth Group, Inc. | H5253 | UnitedHealthcare of Wisconsin, Inc.            |
| UnitedHealth Group, Inc. | H5322 | Care Improvement Plus South Central Insurance  |
| 1,                       |       | Co.  |
| UnitedHealth Group, Inc. | H5420 | Medica Healthcare Plans, Inc.                  |
| UnitedHealth Group, Inc. | H5435 | UnitedHealthcare Insurance Company             |
| UnitedHealth Group, Inc. | H5652 | Sierra Health and Life Insurance Company, Inc. |
| UnitedHealth Group, Inc. | H6526 | UnitedHealthcare of New Mexico, Inc.           |
| UnitedHealth Group, Inc. | H6528 | Care Improvement Plus South Central Insurance  |
|                          |       | Co.  |
| UnitedHealth Group, Inc. | H8211 | MAMSI Life and Health Insurance Company        |
| UnitedHealth Group, Inc. | H8748 | UnitedHealthcare Insurance Company             |
| UnitedHealth Group, Inc. | H8768 | UnitedHealthcare Insurance Co of the River     |
|                          |       | Valley   |
| UnitedHealth Group, Inc. | R3175 | UnitedHealthcare Insurance Company             |
| UnitedHealth Group, Inc. | R3444 | Care Improvement Plus South Central Insurance  |
|                          |       | Co.  |
| UnitedHealth Group, Inc. | R5329 | Sierra Health and Life Insurance Company, Inc. |
| UnitedHealth Group, Inc. | R5342 | UnitedHealthcare Insurance Company of New      |
|                          |       | York   |
| UnitedHealth Group, Inc. | R6801 | Care Improvement Plus of Texas Insurance       |
|                          |       | Company  |
| UnitedHealth Group, Inc. | R7444 | UnitedHealthcare Insurance Company             |

| United Health Crown Inc            | 112247 | United Hoolth care Community Diam Inc          |
|------------------------------------|--------|--|
| UnitedHealth Group, Inc.           | H2247  | UnitedHealthcare Community Plan, Inc.          |
| Universal Care, Inc                | H0838  | Universal Care, Inc.                           |
| Universal Health Services, Inc.    | H5945  | Prominence HealthFirst                         |
| Universal Health Services, Inc.    | H7680  | Prominence HealthFirst of Texas                |
| University of Wisconsin Hospitals  | H5262  | Quartz Health Plan Corporation                 |
| and Clincs Autho                   |        |  |
| Vantage Holdings, Inc.             | H5576  | Vantage Health Plan, Inc.                      |
| Virginia Cwlth University Hlth     | H9877  | Virginia Premier Health Plan, Inc.             |
| System Authority                   |        |  |
| Visiting Nurse Service of New York | H5549  | VNS Choice                                     |
| WellCare Health Plans, Inc.        | H0111  | Wellcare of Georgia, Inc.                      |
| WellCare Health Plans, Inc.        | H0712  | Wellcare of Connecticut, Inc.                  |
| WellCare Health Plans, Inc.        | H0913  | Wellcare Health Plans of New Jersey, Inc.      |
| WellCare Health Plans, Inc.        | H1112  | Wellcare of Georgia, Inc.                      |
| WellCare Health Plans, Inc.        | H1416  | Harmony Health Plan, Inc.                      |
| WellCare Health Plans, Inc.        | H2491  | Wellcare Health Insurance of Arizona, Inc.     |
| WellCare Health Plans, Inc.        | H2775  | American Progressive Life & HLTH INS Company   |
|                                    |        | of NY  |
| WellCare Health Plans, Inc.        | H4506  | Selectcare of Texas, Inc.                      |
| WellCare Health Plans, Inc.        | H5087  | Wellcare of California, Inc.                   |
| WellCare Health Plans, Inc.        | H5656  | Selectcare Health Plans, Inc.                  |
| WellCare Health Plans, Inc.        | H5779  | Meridian Health Plan of Illinois, Inc.         |
| WellCare Health Plans, Inc.        | H7326  | Wellcare of South Carolina, Inc.               |
| WellCare Health Plans, Inc.        | H9730  | Wellcare Health Insurance Company of Kentucky, |
|                                    |        | Inc  |

## **Document History**

| Version | Date Published | Summary of Change(s)                        |  |
|---------|----------------|---|--|
| Number  |                | ,   |  |
| 1       | June 13, 2025  | Original document.                          |  |
| 2       | June 25, 2025  | Updated answers to questions one and seven. |  |