

**PUBLIC COMMENTS FOR THE 8/19/24 COMBINED SEBC FINANCIAL/
HEALTH POLICY AND PLANNING SUBCOMMITTEE MEETING -
SUBMITTED BY ROBERT CLARKIN, 8/16/24**

Please find below my public comments pertaining to the “Audit Services Request for Proposal (RFP) - Scope of Work” agenda item being considered by the combined SEBC Financial/Health Policy and Planning Subcommittee during your meeting on Monday 8/19/24.

During March 2024, while researching the history of the RFP that resulted in the current CVS/Caremark RX contract, I discovered that the SEBC had voted on 10/12/20 to approve a contract with Claim Technologies, Inc (CTI) for Medical and Prescription Audit Services. I had been previously advised by the State Auditors Office that the State does not audit the GHIP, so the existence of a medical and prescription audit caught my attention.

Because I believe that “you get what you inspect”, on 4/2/24 I submitted the following FOIA request to the Department of Human Services (DHR): “During a meeting of the SEBC on 10/12/2020, the committee voted to approve a contract with Claim Technologies, Inc. (CTI) for Medical and Prescription Plan Audit Services. The contract award was for an initial three-year term effective 12/1/2020 through 11/30/2023, with two optional one-year period extensions. A presentation by WTW during the meeting indicated that the audits would be conducted on a biannual basis. I have made an exhaustive search of the DHR website and cannot find links to said audits. Can you please direct me to where I can find electronic copies of the audits conducted to date, or provide me with copies of same. Thank you.”

On 5/31/24, I received the following initial response from DHR: “Additional time is needed to respond to your request because it requires legal review. At this time, we expect to have a formal response to you by July 12, 2024.”

On 7/12/24, I received the following subsequent response from DHR: “Due to required legal review, additional time is needed to respond to your request. At this time, we expect to have a formal response to you by August 30, 2024.”

As you can see, I have been awaiting a formal response to my FOIA request for 19 weeks, and will not receive another response from DHR for 2 more weeks. Recognizing the importance of an RFP for “Audit Services”, I would like to submit the following suggestions for consideration during your 8/19/24 meeting:

1. I have reviewed the agendas for the SEBC Financial Subcommittee, Health Policy and Planning Subcommittee, and full SEBC meetings since 10/12/20 and I have not been able to find an agenda item indicating that the CTI audit results have been presented to the committees during their public or executive sessions. At least to me, it seems obvious that such audit results would be of interest to committee members. I would like to suggest that during your combined 8/19/24 meeting that a process be implemented to insure that the audit results are formally presented to the subcommittees.

2. Because it appears that the GHIP is not audited by the State Auditors Office and because the "Audit Services" are paid for with public funds, I believe that it is imperative that the audit results are made available to the public. I would like to suggest that during your combined 8/19/24 meeting members of the subcommittees commit to releasing the audit results to the public.