

STATE OF WASHINGTON

June 24, 2016

Honorable Troy Kelley Washington State Auditor P.O. Box 40021 Olympia, WA 98504-0021

Dear Auditor Kelley:

Thank you for the opportunity to review the State Auditor's Office (SAO) performance audit report, "Costs and Sustainability at the Washington Health Benefit Exchange."

While not audited for this report, the Health Care Authority (HCA) is a key partner of the Health Benefit Exchange (HBE). HBE has been a national leader in expanding health coverage to Washington state residents. HBE funding and expenditure information, both state and federal, has been regularly shared with the Legislature and the public.

HCA and HBE have worked closely with the federal Centers for Medicare and Medicaid Services (CMS) to ensure compliance with all requirements for the use of federal funds. We are pleased the SAO did not find any inappropriate or questionable expenditures. Rather, the findings address whether the correct share of costs was allocated to Medicaid and other federal grants.

States have many options for developing cost-allocation plans for Medicaid reimbursements. The methodology must be approved by CMS, and only costs documented in the plan can be reimbursed. HCA and HBE worked together to develop a cost-allocation plan that would best serve Washingtonians. That plan, and subsequent annual updates, were approved by CMS. To date, CMS has not questioned the appropriateness of costs charged to its federal grants.

SAO's methodology is different from the methodology CMS approved for our state. Under the approved CMS methodology, more federal grant funding is used for CMS-approved expenditures. If the methodology proposed by the SAO were implemented, \$90 million would retroactively shift to Medicaid. This would require up to \$44.6 million in General Fund-State funds as match for federal fund expenditures. Because we have CMS approval for the current methodology, we are uncertain whether costs incurred under the approved plan will or should be allocated differently.

We appreciate the input about the effects of different methodologies, and will consider it and other information when updating the next cost-allocation plan.

Sincerely,

Derothy J. Lever

Dorothy Frost Teeter, Director Health Care Authority

David Schumacher, Director Office of Financial Management

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