

Mancusi-Ungaro, Michael - OCI

From: Leipold, Amanda <Amanda.Leipold@wpsic.com>
Sent: Friday, January 25, 2019 5:19 PM
To: Mancusi-Ungaro, Michael - OCI
Cc: Madani, Syed T (12736)
Subject: RE: CMS Letter Request
Attachments: WPS COI J-8; WPS COI ltr 10-22-18.pdf

Hi Michael,

In response to your call this morning requesting documentation of CMS' concern over WPS ownership in AHV I have attached two items. The first is an October 22, 2018 letter in which CMS first expressed concerns about WPS' relationship with Aspirus, Inc. In the letter CMS points out that WPS and Aspirus, Inc. are joint 50/50 owners of the Arise Health Venture, and that Aspirus, Inc. providers submit Medicare claims in the Jurisdiction 8 region that are then processed by WPS. CMS questions whether this circumstance creates "an impaired objectivity organizational conflict of interest" for WPS. This was not CMS' position when WPS originally sought and was awarded the jurisdiction 8 contract. However, there has been a change in our CMS Contracting Officer since then and the CMS Contracting Officer holds considerable discretion to determine whether a conflict of interest exists. Through phone conversations with our new CMS Contracting Officer it became apparent that WPS' divestment of its ownership shares in AHV was the best route to address CMS' conflict of interest concerns. Attached is also an email from WPS' CEO responding to the October 22, 2018 letter and confirming that WPS will promptly divest its ownership interest in AHV upon notice that CMS intends to award WPS the jurisdiction 8 contract. I hope this addresses your request. Please let me know if there are questions.

Thanks,

Amanda

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Exh #	B 19
Date	
Case	19-C 42970
Ins. Comm.	

From: Leipold, Amanda
Sent: Friday, January 25, 2019 4:52 PM
To: 'Mancusi-Ungaro, Michael - OCI' <Michael.MancusiUngaro@wisconsin.gov>
Cc: 'Madani, Syed T (12736)' <stmadani@michaelbest.com>
Subject: CMS Letter Request

Hi Michael,

In response to your call to me today, I wanted to let you know I'm putting something together to address your request for documentation from CMS on their concerns regarding WPS' relationship with Aspirus that led to the WPS divestment in AHV. I should have it to you by Monday.

Thanks,

Amanda