



EQUALITY ♦ LAW ♦ JUSTICE

Disability Rights Center of Kansas
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July 8, 2016

Victoria Wachino
Director
Center for Medicaid and CHIP
Services 7500 Security Boulevard, Mail Stop S2-26-12
Baltimore, Maryland 21244-1850

Re: Systemic issues with the eligibility process in the Kansas Medicaid program,
KanCare

Dear Ms. Wachino:

I am writing on behalf of a group of older adult and disability rights advocates who are concerned about the state of Kansas' continued failures to process applications for Medicaid properly and within the time limits required by federal law. Ongoing delays risk depriving applicants of necessary medical care through no fault of their own. The state of Kansas is also violating the due process rights of its citizens by failing to properly and fully inform them of their rights, including the right to an administrative appeal whenever the state fails to timely process an application. The delays and violations are so widespread and systemic that we ask CMS to take any and all steps needed to protect the rights and health of those in need of Medicaid assistance, including requiring the state of Kansas to initiate or amend a corrective action plan, placing additional conditions on any amendment to the KanCare waiver, and ensuring that application problems are resolved as a condition for approval of the state's application to renew its privatized Medicaid program which it intends to file by December 31, 2016.

Since January 2013, Kansas has administered its Medicaid program through a managed care model known as KanCare. CMS approved the demonstration program for 5 years. In August 2011 the state Medicaid agency, Kansas Department of Health and Environment (KDHE), outsourced the eligibility determination process to a private contractor, Accenture, to develop a computerized system to process applications for all social welfare services including Medicaid. The new system is known as KEES (Kansas Eligibility and Enforcement System). The contract called for KEES to be fully operational on October 1, 2013. Accenture missed

the operational deadline and numerous other new deadlines before KEES finally became operational in July 2015.

KEES has been continually beset with significant problems since it became operational. Most significantly, the state and its private partners have failed to process new applications for Medicaid and annual applications to recertify eligibility within the time limits required by federal law (45 days, or 90 days if the applicant is also applying for SSI or Social Security Disability Insurance benefits [42 CFR 435.912(c)(3)(i-ii)]). The backlog of applications worsened significantly after January 1, 2016 when KDHE took over administration of the application process from DCF. Applicants no longer had the option to meet face-to-face with a state employee who helped complete the application. Instead, applicants had to apply online. The applications were also being processed by inexperienced staff hired mainly by private contractors instead of experienced DCF staff. Referrals for Medicaid applications from the ACA federal insurance exchange during open enrollment further complicated the process. As a result, the number of applications that went unprocessed past the 45/90 day deadline soared to more than 18,000 by February 14, 2016. Thousands of the applications were left unprocessed for much longer than the 45 or 90 days. Many applications that were acted upon were denied on an incomplete or erroneous basis. In other cases, individuals' existing Medicaid coverage was terminated because their recertification applications were incorrectly denied.

The Region 7 CMS office was alerted to the dire situation and asked KDHE on February 17, 2016 to provide an action plan to resolve the application backlog issue and bi-weekly updates on its progress. I have enclosed a copy of the letter from James G. Scott, Associate Regional Administrator, for your reference. KDHE Secretary Susan Mosier responded on March 4, 2016 with the state's mitigation plan, a copy of which is also enclosed. In a meeting on May 2, 2016, Secretary Mosier and her staff assured our group that KDHE and its private contractors were on track to completely eliminate the backlog of initial applications by June 30, 2016. In addition to problems associated with the backlog, we raised our concern that the state was compounding its violation of federal law and its own regulations by failing to inform applicants in writing of their right to request an administrative appeal whenever an application is not processed within the 45/90 day period. Secretary Mosier requested additional information on the requirement, which we provided by letter on May 16, 2016, but otherwise was noncommittal about providing the notice. Her office has not responded to our subsequent requests for information.

Despite the lack of response, we were hopeful that the state and its partners would at least follow through on the promise to eliminate the backlog by June 30. The state's latest update on June 10, however, disclosed shocking news that the number of applications unprocessed within 45 days had ballooned from 2,081 to 10,961 and the total number of unprocessed applications had increased by almost 12,000. The state blamed its private contractor for not counting individuals who had reapplied after being previously denied. I've enclosed a copy of the letter and the attachments showing the history of the state's progress eliminating the

backlog. This latest news suggests that all earlier data concerning initial applications is untrustworthy.

The state now claims in a statement to the press that it will eliminate the backlog by “the end of the summer” instead of the end of June. Given the continuing failure of the state and its private partners to meet past deadlines, however, we are extremely skeptical of this claim. We are also concerned that the pressure to meet the new deadline will result in hasty processing of applications and additional erroneous determinations of ineligibility. The actions of the state for the past 12 months clearly demonstrate that it is failing in its responsibility to provide timely and necessary Medicaid coverage to the deserving citizens of Kansas and that it is ignoring its duty to protect their rights to due process. As a result, we believe it is prudent for CMS to require the state to commit to a corrective action plan as a condition of further amendments or extensions of KanCare. Specifically, we request that CMS require the state of Kansas to take the following steps:

1. Document a realistic plan based on accurate data to eliminate the backlog in a timely manner.
2. Document that it is notifying all applicants of their right to file an appeal if their initial applications for Medicaid have not been processed within the required 45/90 day time period;
3. Document that it is informing all approved applicants for Medicaid coverage in writing of their rights to retroactive coverage, which may include 90 days prior to the date of application; including any applicants who have been approved since January 1, 2016 when KDHE assumed administrative control of the application process;
4. Provide data on the percentages of applications that were denied before and after July 1, 2015 (when KEES became operational) and a breakdown of the reasons given for denying the applications; the data is relevant due to the numerous reports of denials for erroneous reasons, such as failure to submit documentation which had been submitted;
5. Document that it is notifying individuals who lost Medicaid coverage temporarily because their recertification applications were incorrectly denied that their providers can submit requests for payment for services that were provided during the period of no coverage; and
6. Document that it has modified information available to Medicaid applicants to include information about when to expect a Medicaid application to be processed and how an applicant can request a hearing.

We believe these requirements are reasonable to help assure Medicaid coverage to all eligible Kansans and are not unduly burdensome on the state. We are available at your convenience to further explain why these conditions are necessary and to answer any other questions you may have. If you wish to schedule a conference call with us, you can contact Lane Williams at 785-273-8697, ext. 117.

Victoria Wachino
July 7, 2016
p. 4

Thank you for your time and consideration of our concerns.

Sincerely,



Rocky Nichols, Executive Director
Lane Williams, Legal Director
James Jordan, Staff Attorney
Disability Rights Center of Kansas, Inc.
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Topeka, KS. 66603

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enclosures

c: James G. Scott
Region 7 Associate Regional Administrator
for Medicaid and Children's Health Operations

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
601 East 12th Street, Suite 355
Kansas City, Missouri 64106



Division of Medicaid and Children's Health Operations

February 17, 2016

Dr. Susan Mosier, Secretary
Kansas Department of Health and Environment
Division of Health Care Finance
Landon State Office Building
900 SW Jackson, Room 900N
Topeka, KS 66612

Dear Dr. Mosier:

We are writing regarding recent reports of the Medicaid application backlog in the state of Kansas. 42 Code of Federal Regulations (CFR) 435.912(c)(3)(i-ii) requires that the determination of eligibility not exceed 90 days for applicants who apply for Medicaid on the basis of disability, and 45 days for all other applicants. As of February 10, 2016, Kansas has notified CMS that there is a backlog of approximately 7,000 eligibility applications.

CMS requests the state identify the number of unprocessed Medicaid eligibility determinations and re-determinations by age and applicant group as indicated below. In addition, CMS requests the age of pending applications which result in the state being out of compliance with federal requirements regarding timely determination of eligibility. Please provide an analysis on a bi-weekly basis that includes the following information:

- Total number of unprocessed new applications received in the last two weeks
- Total number of unprocessed redeterminations received in the last two weeks
- Total number of applications and redeterminations (reported separately) pending on the basis of disability in each of the following categories:
 - 1-30 days since receipt
 - 31-60 days since receipt
 - 61-90 days since receipt
 - Over 90 days since receipt
- Total number of other applications and redeterminations (reported separately) pending in each of the following categories:
 - 1-15 days since receipt
 - 16-30 days since receipt
 - 31-45 days since receipt
 - Over 45 days since receipt

Please also provide an action plan within 14 days from the date of this letter regarding how Kansas plans to resolve this issue, including anticipated timeframes for eliminating the backlog. As part of the action plan, please describe the state process for responding to emergent situations, including but not limited to: individuals presenting for services and being notified that they are no longer

eligible for Medicaid; individuals with urgent medical needs who have filed an application and the determination is beyond the maximum timeframes for a determination; and access to prenatal care for pregnant women. Additionally, describe how the state is addressing unreimbursed care for individuals with pending Medicaid applications due to the backlog.

Finally, Kansans with Medicaid processing problems have been instructed to call the KanCare Clearinghouse. Based on recent articles it can take hours for a beneficiary to get through to a KanCare representative. Please provide call center response times and dropped call rates as well as an action plan on how the KanCare Clearinghouse plans to decrease the call times for beneficiaries.

If you have any questions regarding this request, please contact Karen Hatcher at (816) 426-5925.

Sincerely,

2/17/2016



James G. Scott
Associate Regional Administrator
for Medicaid and Children's Health Operations

Signed by: James G. Scott -A

cc:

Mike Randol
Christiane Swartz

Page 2 - Dr. Susan Mosier

bcc: Megan Buck
Kevin Slaven
Karen Hatcher
Barbara Cotterman

Susan Mesier, MD, Secretary
Michael Randol, Director

Department of Health & Environment

Sam Brownback, Governor

Mr. James G. Scott
Associate Regional Administrator
Medicaid and Children's health Operations
The Centers for Medicare and Medicaid Services (CM)
Room 235, Federal Office Building
601 East 12th Street
Kansas City, MO, 64106

March 4, 2016

Re: Processing status report

Dear Mr. Scott:

This letter serves as KDHE's first status report. In the letter dated February 17, 2016, you asked the agency to provide an analysis of the processing backlog, an action plan for backlog elimination, an analysis of call center performance and an action plan for improving call center performance. Multiple factors contributed to the backlog and the challenges experienced in the call center. Some of the factors are:

- a. The Federal Market open enrollment resulted in over 13,000 applications being received during the months of November, December and January.
- b. On January 4, 2016, the eligibility determination work for the Elderly and Disabled populations was moved from another agency to KDHE. This resulted in an high volume of calls from people just wanting to know what impact that change would have on their eligibility.
- c. Additional calls were also received as a result of people believing they needed to have a 1095-B certificate in order to file their taxes.

The agency developed mitigation plans to address both the processing backlog and call center issues. The mitigation plan for the backlog was implemented last October. Since that time, the agency has continued to assess the processing backlog plan and updated our approach based on experience.

The processing backlog mitigation plan is composed of four elements: 1) staff augmentation/resource reallocation and realignment; 2) process improvements/system defects resolution; 3) mitigation of impact on beneficiaries; and 4) provider reimbursements.

- a. Staff augmentation and realignment: KDHE and its contractor have added 20 temporary full time eligibility staff. Additionally, KDHE has secured resources from other agencies. The targeted staff has experience with application and review processing and will be productive immediately . Overtime has been authorized for both State staff and contractor staff.
- b. Process improvements and defect resolution initiatives: The agency implemented a plan to ensure alignment of the defects resolution with the business needs. The first step was to perform on site observation of the processing staff to identify improvement opportunities. The second step was to create a list of top challenges encountered during processing and prioritize the implementation of system fixes/enhancements based on this

list. These efforts have resulted in a significant drop in processing time over the past several months from 50 minutes per application to 38-40 minutes per application.

- c. **Beneficiary impact mitigation:** To minimize the impact of the processing delays on beneficiaries, special attention is given to pregnant women applications, newborns and applicants with urgent medical needs. This inventory is closely monitored. The call center has a process in place to escalate for immediate processing any application or review identified as urgent. Specialized voice mail boxes have been established to report pregnancies or births.
- d. Once eligibility is determined, it is retroactively established as appropriate to ensure reimbursement of care to providers.

The workload analysis for the first half of February 2016 is provided in Exhibit A.

To address the call center challenges, the agency has taken the following steps:

- a. Analyzed the calls to identify the reason for the call and triaged appropriately
- b. Created specialized voice mails to triage calls and allocate to appropriate staff
- c. Redesigned the scripts to provide information to callers faster
- d. Realigned the IVR workflow to help callers navigate to the appropriate queue faster
- e. Created a special unit to handle the calls related to 1095-B inquiries
- f. Added 19 staff to the call center
- g. Added additional weekend hours to return voicemails
- h. Are in the process of developing an implementation plan for an automated voice response system to provide status information 24/7. Implementation target is the end of this month.

The call center statistics for the month of February are provided in Exhibit B.

If you have any questions or need additional information, please contact Christiane Swartz at 785-368-6296 or at cswartz@kdheks.gov.

Sincerely,



Susan Mosier, MD, MBA, FACS
Medicaid Director
Secretary of Health and Environment
State Health Officer

Cc: Megan Buck
Kevin Slavin
Karen Hatcher
Barbara Cotterman
Aaron Dunkel
Michael Randol
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Susan Mosier, MD, Secretary
Michael Randol, Director

Department of Health & Environment

Sam Brownback, Governor

June 10, 2016

Mr. James G. Scott
Associate Regional Administrator
Medicaid and Children's health Operations
The Centers for Medicare and Medicaid Services (CM)
Room 235, Federal Office Building
601 East 12th Street
Kansas City, MO, 64106

Re: Processing status report

Dear Mr. Scott:

This letter serves as KDHE's eighth status report. In the letter dated February 17, 2016, you asked the agency to provide an analysis of the processing backlog, an action plan for backlog elimination, an analysis of the call center performance and an action plan for improving call center performance. You also asked for bi-weekly reports on the processing backlog and the call center performance.

The agency outlined its mitigation efforts for both the processing backlog and the call center performance in its first report. The implementation of both mitigation plans is on target.

The workload analysis for the period of May 9 through May 22, 2016 has been added to the cumulative spreadsheet and is attached. The change in the application backlog number we are reporting is due to an error in the method the contractor used to create the earlier reports.

The original backlog reports counted only applicants for whom an eligibility determination had not yet been run. The actual backlog also includes individuals for whom an eligibility determination has been run in the past, which could have resulted in a determination of ineligibility, but who have reapplied and whose most recent application is still awaiting determination. The applicant could have also been determined eligible for KanCare, but has since reapplied for a different level of coverage.

The error in the earlier reports has been investigated and reviewed. The contractor has made the necessary corrections so that the application backlog number in this report and reports going forward reflects the actual backlog.

In response to this new information, the agency immediately implemented the following remediation steps: a) retention of all the additional temporary staff who were scheduled to be released at the end of June; b) reallocation/realignment of resources as necessary; c) authorization of overtime for both state staff and contractor staff; and d) continuation of the agreement with the Department of Children and Family for continued assistance with processing of applications.

The call center stats for May 9 through June 3, 2016, are provided in Exhibit B.

The agency continues to closely monitor each area and make necessary adjustments to ensure continuous improvement.

If you have any questions or need any additional information, please contact Christiane Swartz at 785-368-6296 or at cswartz@kdheks.gov.

Sincerely,



Susan Mosier, MD, MBA, FACS

Medicaid Director
Secretary of Health and Environment
State Health Officer

Cc: Megan Buck, Aaron Dunkel, Michael Randol, Christiane Swartz, Glen Yancey, Felicia Harrison

Exhibit A

Total of unprocessed new applications and reviews received in the last two weeks					
	2/1-2/14				
Unprocessed Applications	4871				
Unprocessed Reviews	3227				
Applications and Reviews pending on the basis of disability					
	1-30 days	31-60 days	61-90 days	> 90 days	Total
Unprocessed Applications	2	8	56	260	326
Unprocessed Reviews	0	0	0	0	0
Total number of Other applications and redeterminations					
	1-15 days	16-30 days	31-45 days	> 45 days	Total
Unprocessed Applications	4875	3439	2157	7745	18216
Unprocessed Reviews	3227	2498	2126	10483	18334

Application Backlog Reporting

Exhibit A

Total of unprocessed new applications and reviews received in the last two weeks						
2/15-2/28						
Unprocessed Applications	3355					
Unprocessed Reviews	1738					
Applications and Reviews pending on the basis of disability						
	1-30 days	31-60 days	61-90 days	> 90 days	Total	
Unprocessed Applications	0	8	26	307	341	
Unprocessed Reviews	0	0	0	0	0	
Total number of Other applications and redeterminations						
	1-15 days	16-30 days	31-45 days	> 45 days	Total	
Unprocessed Applications	3355	3840	2424	7847	17466	
Unprocessed Reviews	1738	3203	2753	12084	19778	

	2/1/2016- 2/15/2016-	2/15/2016- 2/28/2016
Apps Received	6271	5244
Apps Processed	5848	7427
Reviews Received	3413	1824
Reviews Processed	396	423

Exhibit A

Total of unprocessed new applications and reviews received in the last two weeks					
2/29-3/13					
Unprocessed Applications	3470				
Unprocessed Reviews	3743				
Applications and Reviews pending on the basis of disability					
	1-30 days	31-60 days	61-90 days	> 90 days	Total
Unprocessed Applications	2	4	31	316	353
Unprocessed Reviews	0	0	0	0	0
Total number of Other applications and redeterminations					
	1-15 days	16-30 days	31-45 days	> 45 days	Total
Unprocessed Applications	3469	3151	1850	7379	15849
	22%	20%	12%	46%	
Unprocessed Reviews	3743	1690	3215	14291	22939
	16%	7%	14%	63%	

2/29/2016 - 3/13/2016	
Apps Received	5651
Apps Processed	8358
Reviews Received	3913
Reviews Processed	213

Application Backlog Reporting

Exhibit A

Total of unprocessed new applications and reviews received in the last two weeks					
3/14-3/27					
Unprocessed Applications	3043				
Unprocessed Reviews	1257				
Applications and Reviews pending on the basis of disability					
	1-30 days	31-60 days	61-90 days	> 90 days	Total
Unprocessed Applications	10	17	43	275	345
Unprocessed Reviews	0	0	0	0	0
Total number of Other applications and redeterminations					
	1-15 days	16-30 days	31-45 days	> 45 days	Total
Unprocessed Applications - Active	2989	1435	969	5414	10807
Unprocessed Applications - Pended	51	71	91	738	951
Unprocessed Applications - Total	3040	1506	1060	6152	11758
	26%	13%	9%	52%	
Unprocessed Reviews	1257	3644	1782	16845	23528
	5%	15%	8%	72%	

3/14/2016 - 3/27/2016	
Apps Received	5194
Apps Processed	8445
Reviews Received	1301
Reviews Processed	388

Application Backlog Reporting

Exhibit A

Total of unprocessed new applications and reviews received in the last two weeks					
3/28 - 4/10					
Unprocessed Applications	1594				
Unprocessed Reviews	4956				
Applications and Reviews pending on the basis of disability					
	1-30 days	31-60 days	61-90 days	> 90 days	Total
Unprocessed Applications	17	29	43	275	364
Unprocessed Reviews	0	0	0	0	0
Total number of Other applications and redeterminations					
	1-15 days	16-30 days	31-45 days	> 45 days	Total
Unprocessed Applications - Active	1430	609	615	2993	5647
Unprocessed Applications - Pended	161	215	220	1465	2061
Unprocessed Applications - Total	1591	824	835	4458	7708
	21%	11%	11%	58%	
Unprocessed Reviews	4956	1244	3607	18228	28035
	18%	4%	13%	65%	

3/28/2016 - 4/10/2016	
Apps Received	5718
Apps Processed	10944
Reviews Received	5291
Reviews Processed	358

Exhibit A

Total of unprocessed new applications and reviews received in the last two weeks					
4/11 - 4/24					
Unprocessed Applications	828				
Unprocessed Reviews	1633				
Applications and Reviews pending on the basis of disability					
	1-30 days	31-60 days	61-90 days	> 90 days	Total
Unprocessed Applications	21	33	42	245	341
Unprocessed Reviews	0	0	0	0	0
Total number of Other applications and redeterminations					
	1-15 days	16-30 days	31-45 days	> 45 days	Total
Unprocessed Applications - Active	597	498	333	2218	3646
Unprocessed Applications - Pended	224	213	187	1069	1693
Unprocessed Applications - Total	821	711	520	3287	5339
	15%	13%	10%	62%	
Unprocessed Reviews	1633	4890	1366	20913	28802
	6%	17%	5%	73%	

4/11/2016 - 4/24/2016	
Apps Received	5382
Apps Processed	11691
Reviews Received	1790
Reviews Processed	303

Exhibit A

Total of unprocessed new applications and reviews received in the last two weeks					
4/25 - 5/8					
Unprocessed Applications	623				
Unprocessed Reviews	2104				
Applications and Reviews pending on the basis of disability					
	1-30 days	31-60 days	61-90 days	> 90 days	Total
Unprocessed Applications	19	34	24	251	328
Unprocessed Reviews	0	0	0	0	0
Total number of Other applications and redeterminations					
	1-15 days	16-30 days	31-45 days	> 45 days	Total
Unprocessed Applications - Active	438	248	261	1250	2197
Unprocessed Applications - Pended	181	128	143	831	1283
Unprocessed Applications - Total	619	376	404	2081	3480
	18%	11%	12%	60%	
Unprocessed Reviews	2104	1580	4724	21128	29536
	7%	5%	16%	72%	

4/25/2016 - 5/8/2016	
Apps Received	5161
Apps Processed	11120
Reviews Received	2891
Reviews Processed	461

Exhibit A

Total of unprocessed new applications and reviews received in the last two weeks					
5/9 - 5/22					
Unprocessed Applications	833				
Unprocessed Reviews	3053				
Applications and Reviews pending on the basis of disability					
	1-30 days	31-60 days	61-90 days	> 90 days	Total
Unprocessed Applications	31	56	52	483	622
Unprocessed Reviews	0	0	0	0	0
Total number of Other applications and redeterminations					
	1-15 days	16-30 days	31-45 days	> 45 days	Total
Unprocessed Applications - Active	1698	1196	1094	8738	12726
Unprocessed Applications - Pended	120	172	152	2223	2667
Unprocessed Applications - Total	1818	1368	1246	10961	15393
	12%	9%	8%	71%	
Unprocessed Reviews	3055	2127	1863	24563	31608
	10%	7%	6%	78%	

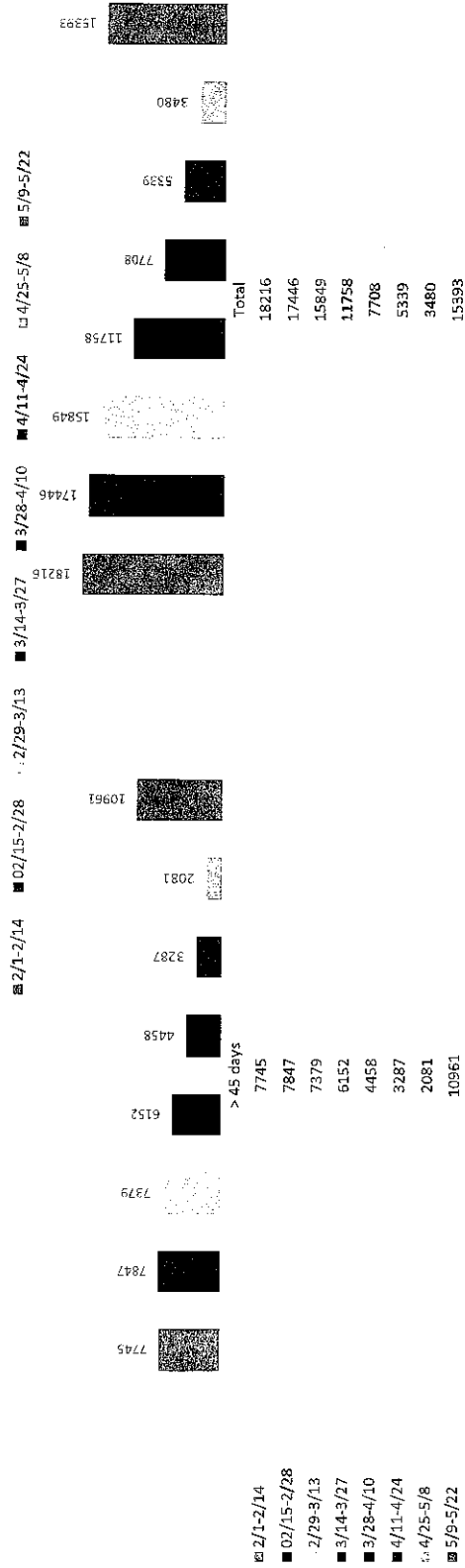
5/9/2016 - 5/22/2016	
Apps Received	5087
Apps Processed	9807
Reviews Received	3439
Reviews Processed	957

3/28-4/10		4/11-4/24		4/25-5/8		5/9-5/22	
5718	5382	5161	5161	5087	5087	5087	5087
10944	11691	11120	11120	9807	9807	9807	9807
5291	1790	2891	2891	3439	3439	3439	3439
358	303	461	461	957	957	957	957
1594	828	623	623	833	833	833	833
4956	1633	2104	2104	3053	3053	3053	3053

3/14-3/27		4/11-4/24		4/25-5/8		5/9-5/22	
Unprocessed Applications	17	21	19	31	31	31	0
Unprocessed Reviews	0	0	0	0	0	0	0
Unprocessed Applications	29	33	34	56	56	56	0
Unprocessed Reviews	0	0	0	0	0	0	0
Unprocessed Applications	43	42	24	52	52	52	0
Unprocessed Reviews	0	0	0	0	0	0	0
Unprocessed Applications	275	245	251	483	483	483	0
Unprocessed Reviews	0	0	0	0	0	0	0
364	341	328	328	622	622	622	0

3/28-4/10		4/11-4/24		4/25-5/8		5/9-5/22	
Unprocessed Applications	1591	821	619	1818	1818	3055	3055
Unprocessed Reviews	4956	1633	2104	2104	2104	2127	2127
% Applications	21%	15%	18%	7%	12%	10%	10%
% Reviews	11%	13%	11%	5%	9%	7%	7%
Unprocessed Applications	824	711	376	1368	1368	1863	1863
Unprocessed Reviews	1244	4890	4724	4724	4724	24563	24563
% Applications	11%	10%	12%	16%	8%	78%	78%
% Reviews	58%	65%	60%	72%	71%	100%	100%
7708	28035	28802	3480	15393	15393	31608	31608

> 45 DAYS VS TOTAL



2/1-2/14 02/15-2/28 2/29-3/13 3/14-3/27 3/28-4/10 4/11-4/24 4/25-5/8 5/9-5/22

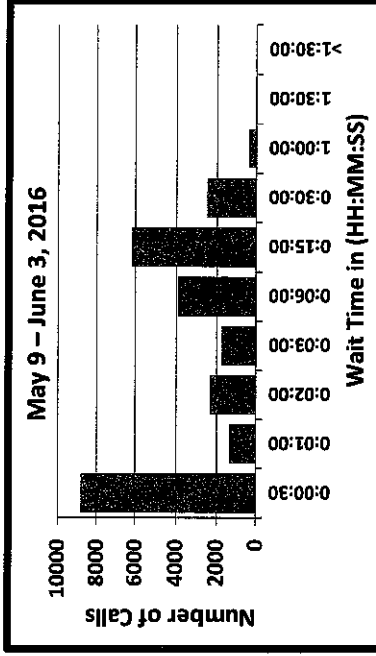
Period	1-15 days	16-30 days	31-45 days	> 45 days	Total
2/1-2/14	4875	3439	2157	7745	18216
02/15-2/28	3335	3840	2424	7847	17446
2/29-3/13	3469	3151	1850	7379	15849
3/14-3/27	3040	1506	1060	6152	11758
3/28-4/10	1591	824	835	4458	7708
4/11-4/24	821	711	520	3287	5339
4/25-5/8	619	376	404	2081	3480
5/9-5/22	1818	1368	1246	10961	15393
Total	18216	17446	15849	7708	5339

Exhibit B: Average Daily Call Stats By Week 5/09 – 6/03/2016

	5/9 - 5/13	5/16 - 5/20	5/23 - 5/27	5/30 - 6/3	4 Week Avg
Calls Offered	1991	1874	1722	2108	1924
Calls Answered	1164	1457	1513	1662	1449
Calls Abandoned	497	243	116	259	266
Avg Wait Time	12:29	4:36	2:12	4:17	5:53
Max Wait Time	0:55:29	0:38:55	0:22:49	28:52	36:31

Call Distribution by Average Wait Time

Wait Time	5/9 - 5/13	5/16 - 5/20	5/23 - 5/27	5/30 - 6/3	4 Week Avg
0:00-15:00	64%	92%	100%	98%	89%
15:01-30:00	30%	8%	0%	2%	9%
> 30:00	6%	0%	0%	0%	1%



Call Distribution by Wait Time Before Abandon

Time to Abandon	5/9 - 5/13	5/16 - 5/20	5/23 - 5/27	5/30 - 6/3	4 Week Avg
0:00-15:00	82%	94%	99%	96%	89%
15:01-30:00	16%	6%	1%	4%	10%
> 30:00	2%	0%	0%	0%	1%

