

March 1, 2021

The Honorable Janet M. Kleinfelter
Deputy Attorney General
State of Tennessee
PO Box 20207
Nashville, TN 37202

Judi Knecht, MPH
Interim COPA Director
Tennessee Department of Health
710 James Robertson Parkway
Nashville, TN 37243

Re: Amended Q2 Fiscal Year 2020 language for Item G.

Dear Ms. Kleinfelter and Ms. Knecht:

As you recall, in February of 2020, Ballad determined that subsequent to its filing of the Quarterly Report for the 2nd fiscal quarter of FY 2020, the language for Item G. should be amended. Ballad notified the Attorney General's Office and the Department of Health (the Department) with the attached e-mail on February 28, 2020. It is my understanding that it is more desirable for a formal letter to be sent which includes the e-mail of February 28, 2020. Please consider this letter and the attached original e-mail as Ballad's submission for this request.

Thank you for your assistance. As always, we welcome any questions or comments that you may have.

Sincerely,



Karen Guske
SVP, COPA Compliance Officer
Ballad Health

Attachment (1)

cc: Larry Fitzgerald
Tennessee COPA Monitor

Tim Belisle, EVP & General Counsel
Ballad Health

Marvin Eichorn, EVP, Chief Administrative Officer
Ballad Health

Guske, Karen S

From: Guske, Karen S
Sent: Friday, February 28, 2020 3:17 PM
To: 'Lisa Piercey, MD, MBA (Commissioner-COPA.health@tn.gov)'
Cc: 'M. Norman Oliver, MD, MA (healthcommissioner@VDH.Virginia.gov)'; 'Jeff Ockerman (jeff.ockerman@tn.gov)'; 'Janet Kleinfelter (janet.kleinfelter@ag.tn.gov)'; 'Eric Bodin (erik.bodin@vdh.virginia.gov)'; 'Allyson Tysinger (atysinger@oag.state.va.us)'; 'Larry Fitzgerald (dhv4ll@gmail.com)'; 'dmbarry@verizon.net'; 'kevin.meyer@vdh.virginia.gov'; Belisle, Tim
Subject: Amended Q2 FY20 language for Item G

Commissioner Piercey, (copy Commissioner Oliver, Jeff Ockerman, Janet Kleinfelter, Erik Bodin, Allyson Tysinger, Larry Fitzgerald, Dennis Barry, Kevin Meyer, and Tim Belisle)

Pursuant to Section 6.04(c) of the Tennessee Terms of Certification, on 2/13/20 we submitted the Quarterly Report and COPA Compliance Office Quarterly Report for the 2nd fiscal quarter of FY 2020 (10/1/19–12/31/19, the “Reporting Period”). However, we subsequently determined that Item 4.G. should be amended. Please accept this submission of amended language for that Item of the Quarterly Report.

G. Any requirements or commitments outlined in the TOC or in the Index which Ballad Health will not meet or anticipates it will not meet:

For the fiscal year ending in June 2020 (FY 20), if there are no changes in the market/economic conditions (conditions) or requirements Ballad does not anticipate it will meet the charity care annual requirements under 4.03(f). Ballad is working closely with the COPA Monitor to ensure awareness of relevant conditions (e.g. Virginia Medicaid expansion, Virginia Medicaid rate improvements, and lower volume).

In addition, it is likely that without changes to the Plans and/or spending commitments Ballad Health does not anticipate it will meet the current FY 20 annual spending commitments for most of the Plans as provided in Exhibit B of the TOC. Given the timing of Plan finalizations and implementation requirements such as staffing, the Plans are early in the spend curve. This early phase is critical to ensure Plan viability and long-term population benefits. However, it is important to know that our overall 10 year spending commitments have not changed, only timing.

Thank you for your assistance. As always, we welcome any questions or comments that you may have.

Sincerely,

Karen S. Guske

SVP, Corporate Responsibility and COPA Compliance Officer

Ballad Health

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It's your story. We're listening.