



Employee Medical Health Plan of Suffolk County  
**WellDyneRx Pharmacy Pricing  
Review Results – Final Report**

**Audit Period: January 1, 2017 to December 31, 2018**

**Report No. C2021-03**

May 21, 2021 / Cristina De Leon, Vice President, Benefit Audit Solutions



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May 21, 2021

Ms. Nerina Sperl  
 Chief Auditor  
 Suffolk County Comptroller Office  
 Employee Medical Health Plan of Suffolk County

Dear Nerina:

On behalf the Employee Medical Health Plan of Suffolk County (EMHP), Segal completed a review of the commercial pharmacy benefit program administered by EMHP’s pharmacy benefit manager (PBM), WellDyneRx (WellDyne), for the 24-month contract period of January 1, 2017 through December 31, 2018. This review included an assessment of the Financial Performance.

The following report presents the details and results of the review process. WellDyne was provided an opportunity to review Segal’s initial audit findings and their responses have been incorporated throughout the audit process and herein.

The main areas of review yielded the following results:

<b>Financial Component</b>	<b>Total Amount Owed</b>
<b>January 2017 through December 2017</b>	
AWP Discounts	\$154,690
Dispensing Fees	\$625
Minimum Rebates	\$1,291,211
<b>Net Amount Due</b>	<b>\$1,446,526</b>
<b>January 2018</b>	
AWP Discounts	\$13,637
Dispensing Fees	\$45
Minimum Rebates	\$94,582
<b>Net Amount Due</b>	<b>\$108,264</b>
<b>February 2018 through December 2018</b>	
AWP Discounts	\$511,617
Dispensing Fees	\$5,778
Minimum Rebates	\$1,329,775
<b>Net Amount Due</b>	<b>\$1,847,170</b>
<b>Subtotal Amount Due</b>	<b>\$3,401,960</b>
<b>Adjusted Financial Savings Guarantee</b>	
February 2018 – January 2019	\$636,849
February 2017 – January 2018	
<b>TOTAL Amount Due</b>	<b>\$4,038,809</b>

- The financial audit results indicate that WellDyne did not achieve all of the contracted guarantees. Segal found a total, aggregate shortfall in the amount of **\$4,038,809** due to Suffolk County/EMHP.
  - The total calculated shortfall amount of the AWP Discounts, Dispensing Fees and Minimum Rebates of **\$3,401,960** is the aggregation of these financial guarantees (exclusive of a \$1,272 Dispensing Fee difference for 2017 and January 2018).
  - Segal also identified an additional potential shortfall of **\$636,849** attributed to the Agreement's Adjusted Financial Savings Guarantee. This amount is separate and distinct from the aforementioned total \$3,401,960 amount. WellDyne responded that the Adjusted Financial Savings Guarantee was outside the audit scope. Segal notes that in the July 2020 Data Request and Scope letter to WellDyne, "Segal will review the pricing agreements between the EMHP and WellDyne and measure any pricing rate guarantees stipulated in the pricing agreements..."

Segal notes that this Adjusted Financial Savings Guarantee is stipulated in the Agreement and is calculated 90 days after the completion of the annual contract periods. Segal recommends that the Adjusted Financial Savings Guarantees are pursued further with WellDyne as the measurement and reporting of this guarantee is a contractual provision.
- During the course of the audit, WellDyne agreed to a revised self-reported underperformance amount of **\$1,147,539**, which was primarily attributed to Rebate shortfalls. Hence, a **\$2,892,542** remaining amount is disputed (inclusive of a \$1,272 Dispensing Fee adjustment).
- **WellDyne has not paid the self-reported underperformance amounts to the EMHP.** WellDyne confirmed the following:

*"WellDyne has not paid out for any CFRs from 2017 – 2019 as all those periods have been under audit."*

Segal notes that according to the Agreement, WellDyne should reconcile, self-report, and pay any applicable financial shortfalls to the plan on an annual basis.

We are available to review the report with you at your convenience.

Sincerely,



Cristina A. De Leon  
Vice President, Benefit Audit Solutions

cc: Stephen Pickering  
Chandler Lee  
Connie Yu

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# Summary of Findings

## Audit Results

Segal performed analyses of the following audit review tasks in order to evaluate WellDyne's performance as EMHP's PBM for the audit periods of January 1, 2017 through December 31, 2018.

Review Task	Outcome
<b>Claims Data Validation</b>	
Monthly Claims Review	Passed
AWP Medi-Span® Review	Discrepancies Noted
Excluded Claims Review	Illustrative
<b>Financial Review</b>	
Administrative Fees Review	Passed
Adjusted Financial Savings Review	Shortfall Noted
AWP Discount Guarantees	Did Not Pass
Dispensing Fee Guarantees	Shortfall Noted
Minimum Rebate Guarantees	Did Not Pass

Segal's analysis of the Average Wholesale Price (AWP) Medi-Span® Review variances resulted in higher variance in matched claims by count (636,075 matched claims of 685,662 total claims)<sup>1</sup>, but a low variance in aggregate AWP dollar amounts. The high variance was a result of WellDyne's rounding for the AWP Unit Cost. Although the dollar difference of most discrepant claims was within \$5.00, Segal utilized Segal's in-house AWP Medi-Span® for the analysis. WellDyne provided a new data set with updated AWP dollar amounts on March 15, 2021 that Segal found to contain the same variance issues previously stated. As a result, Segal's in-house AWP Medi-Span® was utilized for the analysis. The details of the Claims Data Validation review tasks are included in the Appendix of the report.

Segal's review of the Financial Guarantees (i.e. AWP Discounts, Dispensing Fees, and Rebate Guarantees) determined that WellDyne did not meet all of the guarantees. Segal is not in agreement with WellDyne's calculated amount of \$1,147,539 reported underperformance and finds that an additional \$2,255,693 above WellDyne's reported amount is due to Suffolk County/EMHP for the financial performance shortfalls.

The financial areas of AWP Discounts and Minimum Rebate Guarantees have not been agreed upon between Segal and WellDyne. The shortfall differences between Segal and WellDyne are attributed to the following items:

- Categorization and adjudication of Specialty Claim channels and drug types;
- Inclusion of Limited Distribution Drugs (LDDs) for AWP Discounts and Rebates;
- Definition of "Per Exclusive Specialty Claim" for Minimum Rebates; and,
- Definition of "Injectable" drugs for Minimum Rebates.

<sup>1</sup> Details found in the Appendix on Page 17.

Segal also notes that the PBM Agreement contains an annual Adjusted Financial Savings guarantee. Segal analyzed the achievement of this guarantee and calculated an additional amount due of \$636,849<sup>2</sup>. When Segal posed questions regarding the guarantee to WellDyne for confirmation, WellDyne indicated that this financial area is outside of the audit scope. Segal rejects the notion that the shortfall amount is outside the scope of the audit as these findings relate to financial terms. Details of the Adjusted Financial Savings guarantee is outlined in the following section.

## Adjusted Financial Savings Guarantee Review

Segal reviewed the Adjusted Savings Guarantee provided in the Agreement and Amendments. According to Amendment No. 2, this guarantee stipulates that WellDyne will save a minimum of \$2 million dollars in AWP Discount, Dispensing Fee, and manufacturer revenues over the prior 12-month baseline period of February 2017 through January 2018.

Segal's preliminary review found WellDyne did not meet the guarantee; however, additional information may be required as Segal notes that WellDyne had not provided the 2019 monthly rebate reporting. Segal estimated January 2019 rebates using an average of 2019 Quarter 1 Rebates.

Time Period	Total AWP	Total Dollar Spend (Ingredient Cost + Dispensing Fee)	Total Rebate	Total Dollar Savings
February 2017 – January 2018	\$112,357,763	\$48,539,775	\$5,323,450	\$69,141,438
February 2018 – January 2019	\$111,659,935	\$48,001,422	\$6,846,075	\$70,504,588
<b>Savings Difference</b>				<b>\$1,363,151</b>
<b>Minimum Savings Threshold</b>				<b>\$2,000,000</b>
<b>Dollar Amount Owed</b>				<b>\$636,849</b>

Segal notes that this savings guarantee is stipulated in the Agreement as being calculated 90 days after the completion of the first twelve month period (February 1, 2018 through January 31, 2019 and the remainder of the term from February 1, 2019 through April 30, 2019 with the reconciliation of the savings guarantees and all other guarantees occurring within 90 days.

Segal's auditors posed additional questions to WellDyne regarding the Adjusted Financial Savings Guarantee and WellDyne provided the following response:

*As for the request about the EMHP Adjusted Financial Savings Guarantee, WellDyne considers this to be outside the scope of the initial request. All requested deliverables from the initial scope document have been provided and WellDyne considers the questions surrounding the intercept claims to be the last remaining part for the 2017 – 2018 Financial Audit.*

Segal recommends that the Adjusted Financial Savings Guarantees be pursued further with WellDyne as the measurement and reporting of this guarantee is a contractual requirement of WellDyne.

<sup>2</sup> Details for the shortfall calculations can be found on the Page 2 table above.

# Financial Review

## Background and Scope

The purpose of the financial review is to determine the accuracy of WellDyne's application of contractual pricing terms to the pharmacy claims during the review periods from January 1, 2017 through December 31, 2018. Pricing terms reviewed include Average Wholesale Price (AWP) Discounts, per Rx Dispensing Fees, and Minimum Rebate guarantees.

## Review Process

To conduct this review, Segal reviewed a file of all claims adjudicated by WellDyne during the contract periods from January 1, 2017 through December 31, 2018. Segal performed an initial review of these claims to determine any anomalies or unexplained pricing methodology. The findings were presented to WellDyne for additional clarification and their responses were incorporated into Segal's review.

In response to Segal's request for WellDyne to confirm and memorialize their responses, WellDyne indicated:

*"WellDyne stands behind the provided responses and confirms including them in the report."*

## Source Documentation

In order to determine the applicable contract terms, Segal reviewed the following:

- **Prescription Benefits Management Services Agreement**, between WellDyne and Suffolk County for the Employee Medical Health Plan of Suffolk County, effective May 1, 2014 (Agreement). Also referred to as "Base Agreement" throughout this report.
- **Amendment No. 1 to the Prescription Benefit Services Agreement**, between WellDyne and Suffolk County for the Employee Medical Health Plan of Suffolk County effective January 1, 2017. Also referred to as "Amendment No. 1" throughout this report.
- **Amendment No. 2 to the Prescription Benefit Services Agreement**, between WellDyne and Suffolk County for the Employee Medical Health Plan of Suffolk County effective February 1, 2018. Also referred to as "Amendment No. 2" throughout this report.

## Administrative Fees Review

Segal reviewed the invoices provided by WellDyne to validate that the fees are in accordance with the fees indicated in the PBM Agreement. According to the Base Agreement and Amendment No. 2, there is no base administrative fee (\$0.00 per claim) per electronic claim. There is a manual claim administration fee of \$2.50 per claim.

Segal reviewed the invoices and determined that WellDyne charged the correct manual claim administrative fees during the periods of January 1, 2017 through December 31, 2018.

Claim Type	Paid Claims	Total Admin Fee Billed	Calculated Admin Fee/Rx	Contracted Admin Fee/Rx
Manual – 2017	109	\$272.50	\$2.50	\$2.50
Manual – 2018	56	\$140.00	\$2.50	\$2.50

## Summary of Results

Segal evaluated the following financial guarantees metrics: AWP Discounts (Ingredient Cost), Dispensing Fees, and Minimum Rebates. Herein contains a summary of the amount due Segal calculated, the amount WellDyne self-reported, and WellDyne's updated rebate amount uncovered through the course of the audit:

Pricing Guarantee	Segal Audited Amount Due	Initial PBM-Reported Underperformance Amount	Revised PBM Amount	Segal Audited less WellDyne (Revised) Reported Amount Due
<b>January 2017 through December 2017</b>				
AWP Discounts	\$154,690	\$268	-	\$154,422
Dispensing Fees	\$625	\$1,814	-	\$0 *
Minimum Rebates	\$1,291,211	-	\$625,632	\$665,579
<b>Net Amount Due</b>	<b>\$1,446,526</b>	<b>\$2,082</b>	<b>\$625,632</b>	<b>\$820,001</b>
<b>January 2018</b>				
AWP Discounts	\$13,637	\$478	-	\$13,159
Dispensing Fees	\$45	\$128	-	\$0 *
Minimum Rebates	\$94,582	-	\$15,610	\$78,972
<b>Net Amount Due</b>	<b>\$108,264</b>	<b>\$606</b>	<b>\$15,610</b>	<b>\$92,131</b>
<b>February 2018 through December 2018</b>				
AWP Discounts	\$511,617	\$17,457	-	\$494,160
Dispensing Fees	\$5,778	\$5,402	-	\$376
Minimum Rebates	\$1,329,775	-	\$480,750	\$849,025
<b>Net Amount Due</b>	<b>\$1,847,170</b>	<b>\$22,859</b>	<b>\$480,750</b>	<b>\$1,343,561 *</b>
<b>Total Amount Due</b>	<b>\$3,401,960</b>	<b>\$25,547</b>	<b>\$1,121,992</b>	<b>\$2,255,693 *</b>

\* Totals adjusted based on dispensing fee differentials. Although the dispensing fee difference for the 2017 period and 2018 period is \$1,189 and \$83, respectively, the dollar amount owed is \$0 as WellDyne's overperformance does not count against Suffolk County/EMHP.

For the 2017 and 2018 audit periods, the following measurement and reconciliation basis was used in completing the audit:



- According to the Agreement effective May 1, 2014, each AWP Discounts, Dispensing Fees, and Rebate guarantees will be measured and reconciled on a component basis. Any overperformance or underperformance with respect to the component may not be used to offset deficiencies in another component.
- The AWP Discount shortfall calculations are based on the comparison of Segal's calculated shortfall amounts to WellDyne's reported shortfall amounts. **Segal calculated a combined \$679,944<sup>3</sup> underperformance from the AWP Discount guarantees compared to WellDyne's reported shortfall of \$18,203<sup>4</sup>.** Segal found the following issues, which Segal brought to WellDyne's attention. **The following points below contribute to the difference between Segal's calculated amount and WellDyne's calculated amount:**
  - Segal found drugs such as Metformin (e.g., generic diabetes medication of Glucophage) on WellDyne's exclusions list under "Medical Supplies" and "Diabetic Supplies and Devices".
    - *WellDyne notes that the Diabetic Supplies and Devices claims were incorrectly excluded as "Medical Supplies" and provided Segal a list of claims that were incorrectly excluded, but have now been included in the reconciliation.*
    - Segal reviewed drugs on the Diabetic Supplies and Devices list, and found it included prescription drugs often used in the treatment of diabetes (e.g., Trulicity, Lantus).
    - *WellDyne agrees with the error and responded that the claims have been removed and along with a new reconciliation file.*
    - **Segal's review indicates that the new reconciliation file sent on February 23, 2021 still contains Trulicity and Lantus as exclusions. Based on the inconsistent product listing and definition surrounding Medical Supplies and the inclusion of Trulicity and Lantus, Segal rejects WellDyne's use of its "Medical Supplies" list as an exclusion.**
  - Segal found a systemic issue where non-specialty claims had been adjudicated under the specialty mail and specialty retail channels. Claims such as Flucelvax (Influenza Vaccine), Epi-pen (Epinephrine), and Saxenda (Weight Loss Injection) are being adjudicated as Specialty despite not being identified in any of WellDyne's Specialty Lists.
    - WellDyne notes that EMHP does not use the standard WellDyne specialty list and they submitted the applicable specialty and Limited Distribution Drug (LDD) list to Segal.
    - **Segal's review of the audit claims file indicates that WellDyne's adjudication does not follow the specialty list provided to Segal. Segal reconciled specialty drugs based on the list provided and not the specialty indicator found in the data set.**
  - Segal finds Specialty Mail and Specialty Retail should be broken out into 4 individually reconciled channels under Specialty Mail Brand, Specialty Mail Generic, Specialty Retail Brand, and Specialty Retail Generic:
    - WellDyne states the following, "*SpRx is only guaranteed in aggregate for US Specialty Care (USSC) exclusively.*" Segal interprets the response to mean that WellDyne only considers Specialty claims at the Mail channel to be eligible for financial guarantees, and only aggregated across Brands and Generics combined. Segal notes that Retail

<sup>3</sup> Amount calculated by adding AWP Discounts for the Segal Audited Amount Due column.

<sup>4</sup> Numbers based on WellDyne's self-reported dollar amount. Amount calculated by adding AWP Discounts for the Initial PBM - Reported Underperformance Amount. WellDyne confirms that no underperformance amounts have been paid.

- Specialty claims may be attributed to limited distribution drugs (LDDs) not available at the USSC pharmacy.
- Segal found WellDyne to be inconsistent with regard to classifying claims as Specialty for guarantees. Several claims included by WellDyne in their Specialty guarantee reconciliation were not indicated as Specialty in the claims detail provided for the review. For example, Segal has uncovered that WellDyne wrongly classifies the flu vaccine as specialty retail.
  - Segal believes that Specialty claims for drugs dispensed at Retail (e.g., LDDs) are part of the Specialty Rx program and thus should not be excluded from guarantee reconciliation. Excluding Specialty Retail claims results in a large percentage of EMHP’s Specialty drug spend excluded from financial guarantees. For this reason, Segal included the Specialty Retail claims in the analysis.
  - **Segal has not come to resolution with WellDyne on this matter.**
- Segal did not find contractual language to exclude Limited Distribution Drugs (LDDs) from financial guarantees. These claims should be included in the reconciliation:
    - WellDyne states the following: *“WellDyne did not guarantee an LDD rate and therefore do not reconcile claims for LDD Drugs.”*
    - LDDs tend to have less advantageous discounts, and are often excluded from financial guarantees. However, all claim exclusions should be explicitly noted in the Agreement.
    - **Segal has not come to resolution with WellDyne on this matter.**
- Minimum Rebate guarantee calculations are based on the comparison of Segal’s calculated total guaranteed minimum rebates to the total rebate paid amount. **Segal calculated a combined \$2,715,568<sup>5</sup> underperformance from the minimum rebate guarantees compared to WellDyne’s minimum rebate calculation total of \$1,121,992<sup>6</sup>. The additional disputed rebate amount due to Suffolk County/EMHP is \$1,593,576<sup>7</sup>.** Segal notes that the Plan should be receiving 100% of all rebates:
- WellDyne’s initial rebate shortfall was reported as \$0. Following Segal’s preliminary analysis, WellDyne recalculated the rebate guarantees, and reported the following shortfalls for minimum rebate guarantees. The values can be found on Summary of Results table on Page 4:
    - \$625,632 for January through December of 2017
    - \$15,610 for January of 2018
    - \$480,750 for February through December of 2018
    - Total for January 2017 through December 2018 due to EMHP: \$1,121,992
  - Amendment No. 2 guarantees specialty drugs on a per claim basis. However, Segal’s review of the reconciliation files shows that Specialty Generic claims are excluded from WellDyne’s February through December 2018 minimum rebate guarantees. Segal finds an additional \$225,600 owed to EMHP. This number is in Segal’s calculation of the overall rebate calculations illustrated on Page 4.

<sup>5</sup> Details for the calculations can be found on page 13.

<sup>6</sup> The amount was uncovered during the audit process and will be paid out upon the close of the audit.

<sup>7</sup> Calculated difference between Segal’s underperformance of \$2,715,568 and WellDyne’s underperformance of \$1,121,992.

- Segal found a systemic issue where non-specialty claims have been adjudicated under the specialty mail and specialty retail channels.
  - WellDyne notes that EMHP does not use the standard WellDyne specialty list and submitted the applicable specialty and Limited Distribution Drug (LDD) lists to Segal.
  - Segal updated the specialty indicator using the list provided by WellDyne. However, Segal’s review indicates that WellDyne’s adjudication does not follow the specialty list provided to Segal. **The audit results and shortfalls are based off the list that WellDyne provided and not the specialty indicator in the claims data set.**
  
- For the reconciliation period from February 2018 through December 2018, the Agreement states Specialty Rebates will be guaranteed on a "Per Exclusive Specialty Claim" basis. Segal interprets this to mean all Specialty claims whether brand, generic, filled at a retail pharmacy, or filled at USSC<sup>8</sup>:
  - WellDyne states the following: *WellDyne disagrees with Segal’s interpretation of the 2018 contract language. Rebates should be paid only on specialty claims dispensed through US Specialty care (USSC) based on the language “Per Exclusive Specialty Claim”.*
  - Segal’s interpretation of the Agreement counts each Specialty claim filled at a retail pharmacy to receive Specialty Rebates for both Brand and Generic claims; WellDyne’s interpretation counts Specialty claims filled at a retail pharmacy to receive Retail rebates for Brand claims and no rebates for Generic claims. The minimum guarantees on a Specialty (Brand and Generic) claim and Retail Brand claim are \$600 and \$75 dollars, respectively.) The financial impact of the difference is \$723,600 owed to EMHP as illustrated on the Specialty row of Page 13.
  - **Segal has not come to resolution with WellDyne on this matter.**
  
- WellDyne excludes “injectables” from pricing guarantees. WellDyne categorized subcutaneous pens as injectables. Segal disagrees with WellDyne’s “Injectables” exclusion as the term is vague for the purpose of adjudicating claims. Using Medi-Span’s Route of Administration<sup>9</sup> field, Segal excluded claims with the “Injection” classification. Several drugs, such as Novolog and Humira are classified by Medi-Span’s Route of Administration as “Subcutaneous” and therefore included in Segal’s analysis.
  - WellDyne stated the following: *“Subcutaneous pen is another form of injection, therefore it will remain in the exclusion as an injectable.”*
  - **Segal has not come to resolution with WellDyne on this matter.**

<sup>8</sup> US Specialty Care (USSC) is WellDyne’s Specialty Mail Order pharmacy.

<sup>9</sup> Route of Administration is how a drug is administered to the patient such as Oral, Ophthalmic, Nasal, Injection, etc.

# Analysis and Supporting Calculations

## AWP Discounts

The following table indicates the achieved discounts for each dispensing channel and drug source for January 1, 2017 through December 31, 2018. Positive values in the last two columns correspond to shortfalls. Values in the Calculated Amount Due are \$0 for overperformances.

**Segal calculated a \$679,944 combined underperformance from the discounted AWP totals (Billed Ingredient Cost to the Guaranteed Ingredient Cost) based on the pricing guarantees from January 1, 2017 through December 31, 2018.**

Dispensing Channel / Drug Source	Claim Count	Average Wholesale Price	Achieved Discount	Guaranteed Discount	Billed Ingredient Cost	Guaranteed Ingredient Cost	Billed Less Guaranteed Ingredient Cost	Calculated Amount Due
<b>January 1, 2017 through December 31, 2017</b>								
Mail Brand	25,185	\$24,529,823	26.07%	26.00%	\$18,134,863	\$18,152,069	(\$17,206)	\$0
Mail Generic	102,249	\$35,321,846	83.26%	82.75%	\$5,914,389	\$6,093,018	(\$178,629)	\$0
Retail 90 Brand	11	\$7,579	18.45%	22.00%	\$6,181	\$5,912	\$269	\$269
Retail 90 Generic	92	\$26,337	75.59%	79.00%	\$6,428	\$5,531	\$897	\$897
Retail Brand	25,637	\$8,863,138	16.00%	17.00%	\$7,444,829	\$7,356,405	\$88,424	\$88,424
Retail Generic	176,827	\$16,380,447	78.80%	79.00%	\$3,472,268	\$3,439,894	\$32,374	\$32,374
Specialty Mail Brand	893	\$3,956,172	16.19%	16.00%	\$3,315,582	\$3,323,184	(\$7,602)	\$0
Specialty Mail Generic	441	\$870,906	16.16%	16.00%	\$730,151	\$731,561	(\$1,410)	\$0
Specialty Retail Brand	982	\$7,854,854	15.58%	16.00%	\$6,630,802	\$6,598,077	\$32,725	\$32,725
Specialty Retail Generic	68	\$102,834	46.75%	16.00%	\$54,761	\$86,381	(\$31,620)	\$0
<b>Total</b>	<b>332,385</b>	<b>\$97,913,937</b>	<b>-</b>	<b>-</b>	<b>\$45,710,254</b>	<b>\$45,792,032</b>	<b>-</b>	<b>\$154,689</b>
<b>January 1, 2018</b>								
Mail Brand	1,930	\$1,929,628	26.12%	26.00%	\$1,425,683	\$1,427,925	(\$2,242)	\$0
Mail Generic	8,957	\$3,210,076	83.34%	82.75%	\$534,713	\$553,738	(\$19,025)	\$0
Retail 90 Brand	1	\$507	20.32%	22.00%	\$404	\$396	\$8	\$8
Retail 90 Generic	8	\$1,344	43.82%	79.00%	\$755	\$282	\$473	\$473
Retail Brand	2,002	\$557,547	16.04%	17.00%	\$468,089	\$462,764	\$5,325	\$5,325
Retail Generic	17,163	\$1,662,423	78.69%	79.00%	\$354,269	\$349,109	\$5,160	\$5,160
Specialty Mail Brand	69	\$308,398	15.26%	16.00%	\$261,343	\$259,054	\$2,289	\$2,289
Specialty Mail Generic	34	\$62,235	15.39%	16.00%	\$52,659	\$52,277	\$382	\$382
Specialty Retail Brand	70	\$562,212	16.05%	16.00%	\$471,992	\$472,258	(\$266)	\$0
Specialty Retail Generic	4	\$993	18.63%	16.00%	\$808	\$834	(\$26)	\$0
<b>Total</b>	<b>30,238</b>	<b>\$8,295,363</b>	<b>-</b>	<b>-</b>	<b>\$3,570,715</b>	<b>\$3,578,637</b>	<b>-</b>	<b>\$13,637</b>

Dispensing Channel / Drug Source	Claim Count	Average Wholesale Price	Achieved Discount	Guaranteed Discount	Billed Ingredient Cost	Guaranteed Ingredient Cost	Billed Less Guaranteed Ingredient Cost	Calculated Amount Due
<b>February 1, 2018 through December 31, 2018</b>								
Mail Brand	20,574	\$21,989,832	27.36%	26.00%	\$15,973,813	\$16,272,476	(\$298,663)	\$0
Mail Generic	90,567	\$32,766,527	82.88%	82.75%	\$5,608,128	\$5,652,226	(\$44,098)	\$0
Retail 90 Brand	4	\$3,386	21.79%	22.00%	\$2,649	\$2,641	\$7	\$7
Retail 90 Generic	82	\$21,184	67.71%	79.50%	\$6,840	\$4,343	\$2,497	\$2,497
Retail Brand	20,546	\$6,048,525	15.56%	17.00%	\$5,107,458	\$5,020,276	\$87,182	\$87,182
Retail Generic	168,185	\$16,375,006	79.37%	79.50%	\$3,378,533	\$3,356,876	\$21,657	\$21,657
Specialty Mail Brand	984	\$4,635,114	16.57%	17.00%	\$3,867,040	\$3,847,144	\$19,896	\$19,896
Specialty Mail Generic	361	\$631,712	16.70%	17.00%	\$526,208	\$524,321	\$1,888	\$1,888
Specialty Retail Brand	874	\$7,755,778	12.12%	17.00%	\$6,815,786	\$6,437,296	\$378,490	\$378,490
Specialty Retail Generic	60	\$167,379	42.85%	17.00%	\$95,663	\$138,925	(\$43,262)	\$0
<b>Total</b>	<b>302,237</b>	<b>\$90,394,444</b>	<b>-</b>	<b>-</b>	<b>\$41,382,118</b>	<b>\$41,256,524</b>	<b>-</b>	<b>\$511,617</b>
<b>Grand Total</b>								<b>\$679,944</b>

Totals are rounded to nearest dollar.

- WellDyne originally self-reported a shortfall of \$18,203<sup>10</sup> attributed to the discount guarantees. Segal finds measurable differences attributed to WellDyne's problematic and/or discrepant classification, measurement and reconciliation of select products and categories.
- The AWP amounts in the charts reflect the Medi-Span® amounts for the National Drug Code (NDC) provided on the claims file, on the Service Date.
- Segal finds no explicit language located in the Agreement excluding the Limited Distribution Drugs (LDDs) from guarantees; however, WellDyne disagrees and states that LDDs should be excluded.
- Segal found that prescription diabetic medications such as metformin (e.g., generic Glucophage) were excluded by WellDyne on the basis of "Medical Supplies" and "Diabetic Supplies". WellDyne stated:

*"Upon review, WellDyne has identified diabetic supply claims which were incorrectly excluded as 'Medical Supplies'."*

Following a list of Claim IDs with incorrect identification, Segal found drugs such as Trulicity and Lantus were incorrectly excluded as Medical Supplies. Segal requested that this be reversed. WellDyne stated:

*"Trulicity & Lantus is being removed from Diabetic supply since it is an injection."*

Segal's analysis of the updated WellDyne reconciliation file received on February 23, 2021 shows Trulicity and Lantus are still being excluded under the "Medical Supplies" exclusion.

- Segal finds Specialty claims should be broken out into four (4) separately reconciled channels using the list provided by WellDyne. WellDyne has stated that only the Specialty claims filled at USSC are considered Specialty. WellDyne's adjudication system has classified some drugs not on the specialty list as Specialty Retail including the flu vaccine.

<sup>10</sup> WellDyne's self-reported yearly reconciliation shortfall amount. The self-reported amount has NOT been paid.

- Per the Agreement, the following types of claims are excluded from the AWP discount guarantee calculations:
  - Compound Drugs
  - Over-the-Counter (OTC) Drugs
  - Long-term care (LTC) pharmacy claims
  - Veteran's Affairs (VA)
  - 340B
  - Military
- The following exclusions were not identifiable from the claims detail supplied:
  - Medical Supplies – the information WellDyne provided is a list of commercially-available oral and injectable diabetes medications and strips, etc., and are not medical supplies.
  - In-house pharmacy
  - Supplies related to drug dispensed
  - Indian Tribal

## Dispensing Fees Guarantee

The following table illustrates the dispensing fee performance. Positive integers in the final two columns denote underperformance amounts.

Segal calculated a combined **\$6,449** underperformance from the billed dispensing fee to the guaranteed dispensing fee.

Dispensing Channel / Drug Source	Claim Count	Achieved Dispensing Fee / Rx	Guaranteed Dispensing Fee / Rx	Billed Dispensing Fee	Guaranteed Dispensing Fee	Billed Less Guaranteed Dispensing Fee	Calculated Amount Due
<b>January 1, 2017 through December 31, 2017</b>							
Mail Brand	25,185	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Mail Generic	102,249	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Retail 90 Brand	11	\$0.60	\$0.60	\$6.60	\$6.60	\$0.00	\$0.00
Retail 90 Generic	92	\$0.60	\$0.60	\$55.20	\$55.20	\$0.00	\$0.00
Retail Brand	25,637	\$0.54	\$0.60	\$13,942.80	\$15,382.20	(\$1,439.40)	\$0.00
Retail Generic	176,827	\$0.60	\$0.60	\$105,969.60	\$106,096.20	(\$126.60)	\$0.00
Specialty Mail Brand	893	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Specialty Mail Generic	441	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Specialty Retail Brand	982	\$0.60	\$0.00	\$585.60	\$0.00	\$585.60	\$585.60
Specialty Retail Generic	68	\$0.58	\$0.00	\$39.60	\$0.00	\$39.60	\$39.60
<b>Total</b>	<b>332,385</b>	-	-	<b>\$120,599.40</b>	<b>\$121,540.20</b>	-	<b>\$625.20</b>
<b>January 1, 2018</b>							
Mail Brand	1,930	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Mail Generic	8,957	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Retail 90 Brand	1	\$0.60	\$0.60	\$0.60	\$0.60	\$0.00	\$0.00
Retail 90 Generic	8	\$0.60	\$0.60	\$4.80	\$4.80	\$0.00	\$0.00
Retail Brand	2,002	\$0.50	\$0.60	\$999.00	\$1,201.20	(\$202.20)	\$0.00
Retail Generic	17,163	\$0.60	\$0.60	\$10,283.40	\$10,297.80	(\$14.40)	\$0.00
Specialty Mail Brand	69	\$0.02	\$0.00	\$1.50	\$0.00	\$1.50	\$1.50
Specialty Mail Generic	34	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Specialty Retail Brand	70	\$0.59	\$0.00	\$41.50	\$0.00	\$41.50	\$41.50
Specialty Retail Generic	4	\$0.60	\$0.00	\$2.40	\$0.00	\$2.40	\$2.40
<b>Total</b>	<b>30,238</b>	-	-	<b>\$11,333.20</b>	<b>\$11,504.40</b>	-	<b>\$45.40</b>
<b>February 1, 2018 through December 31, 2018</b>							
Mail Brand	20,574	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Mail Generic	90,567	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Retail 90 Brand	4	\$0.60	\$0.60	\$2.40	\$2.40	\$0.00	\$0.00
Retail 90 Generic	82	\$0.56	\$0.60	\$45.60	\$49.20	(\$3.60)	\$0.00
Retail Brand	20,546	\$0.53	\$0.60	\$10,845.20	\$12,327.60	(\$1,482.40)	\$0.00
Retail Generic	168,185	\$0.63	\$0.60	\$105,788.00	\$100,911.00	\$4,877.00	\$4,877.00
Specialty Mail Brand	984	\$0.02	\$0.00	\$21.00	\$0.00	\$21.00	\$21.00
Specialty Mail Generic	361	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Specialty Retail Brand	874	\$0.94	\$0.00	\$821.90	\$0.00	\$821.90	\$821.90
Specialty Retail Generic	60	\$0.98	\$0.00	\$58.50	\$0.00	\$58.50	\$58.50
<b>Total</b>	<b>302,237</b>	-	-	<b>\$117,582.60</b>	<b>\$113,290.20</b>	-	<b>\$5,778.40</b>
<b>Grand Total</b>							<b>\$6,449</b>

- Segal accepts WellDyne's self-reported \$7,344 shortfall amount.

- Per the Agreement, the following types of claims are excluded from the dispensing fee guarantee calculations:
  - Compound Drugs
  - Over-the-Counter (OTC) Drugs
  - Long-term care (LTC) pharmacy claims
  - Veteran's Affairs (VA)
  - 340B
  - Military
- The following exclusions were not identifiable from the claims detail supplied:
  - Medical Supplies – the information WellDyne provided is a list of commercially-available oral and injectable diabetes medications and strips, etc., and are not medical supplies.
  - In-house pharmacy
  - Supplies related to drug dispensed
  - Indian Tribal



## Minimum Rebates Guarantee

Rebates are additional payments made by drug manufacturers to lower the cost of certain brand drugs. Per the Agreement, WellDyne provides a guarantee on the rebates paid by the pharmaceutical manufacturers as the greater of:

- The total (100%) rebates paid by the manufacturers, or,
- The total minimum rebates guaranteed on a per-Brand Rx basis times actual Brand Rx claims.

Segal notes that the specific rebate amount earned per drug is proprietary and kept confidential between the drug manufacturer and WellDyne, therefore, only minimum rebate amounts are reviewed for this analysis.

**Segal calculated a combined \$2,715,568 underperformance from the minimum rebate guarantees compared to WellDyne's minimum rebate calculations.**

Dispensing Channel / Drug Source	Brand Claim Count	Guaranteed Minimum Rebate Per Brand Rx	Total Guaranteed Minimum Rebates	Total Rebates Paid	Guaranteed Less Paid Rebates	Calculated Amount Due
<b>January 1, 2017 through December 31, 2017</b>						
Retail	23,422	\$57.80	\$1,353,792	\$1,152,416	\$201,376	\$201,376
Mail	25,029	\$171.85	\$4,301,234	\$3,504,537	\$796,697	\$796,697
Specialty	758	\$493.50	\$374,073	\$80,934	\$293,139	\$293,139
<b>Total</b>	<b>49,209</b>	<b>-</b>	<b>\$6,029,099</b>	<b>\$4,737,887</b>	<b>\$1,291,212</b>	<b>\$1,291,212</b>
<b>January 1, 2018</b>						
Retail	2,034	\$57.80	\$117,565	\$78,319	\$39,246	\$39,246
Mail	1,924	\$171.85	\$330,639	\$275,304	\$55,335	\$55,335
Specialty	49	\$493.50	\$24,182	\$39,480	(\$15,298)	\$0
<b>Total</b>	<b>4,007</b>	<b>-</b>	<b>\$472,386</b>	<b>\$393,103</b>	<b>\$79,283</b>	<b>\$94,581</b>
<b>February 1, 2018 through December 31, 2018</b>						
Retail	14,632	\$75.00	\$1,097,400	\$1,020,225	\$77,175	\$77,175
Mail	18,531	\$250.00	\$4,632,750	\$4,103,750	\$529,000	\$529,000
Specialty	2,277	\$600.00	\$1,366,200	\$642,600	\$723,600	\$723,600
<b>Total</b>	<b>35,440</b>		<b>\$7,096,350</b>	<b>\$5,766,575</b>	<b>\$1,329,775</b>	<b>\$1,329,775</b>
<b>Grand Total</b>						<b>\$2,715,568</b>

- Per Amendment No. 1 (January 2017 through January 2018), the following types of claims are excluded from the minimum rebate guarantee calculations:
  - Compound Drugs
  - Over-the-Counter (OTC) Drugs
  - 340B
  - Coordination of Benefits (COB)
  - Injectables
  - Manual Claims
- Per Amendment No. 2 (February 2018 through December 2018), the following claims are excluded from the minimum rebate guarantee calculations:
  - Compound Drugs
  - Over-the-Counter (OTC) Drugs
  - Long-term care (LTC) pharmacy claims

- Military
  - Coordination of Benefits (COB)
  - Vaccines
  - Manual Claim
  - Powder Claim
  - 50% copay or greater claims
- The following exclusions were not identifiable from the claims detail supplied by WellDyne:
    - Medical Supplies - the provided information received from WellDyne is a list of commercially-available oral and injectable diabetes medications and strips, etc. and is rejected by Segal.
    - In-house pharmacy
    - Locations owned by universities
    - Claims with invalid identifiers
    - Cosmetic Drugs (Feb to Dec 2018)
    - Indian Tribal
  - Per Amendment No. 2, which covers the February to December 2018 period, Segal's interpretation of the terms finds all specialty claims, regardless of brand or generic, and regardless of place of fill, should be included in the minimum rebate guarantees.
  - Segal found a systemic issue where non-specialty claims have been adjudicated under the specialty mail and specialty retail channels. The specialty list provided by WellDyne does not match the drugs that WellDyne's reconciliation files classify as specialty products.
  - Specialty Retail claims are dispensed under WellDyne's Specialty Program therefore these claims are included in the specialty rebates. WellDyne states only the Specialty Claims dispensed at USSC Specialty Pharmacy should receive the specialty rebates.
  - Segal excludes all claims with a Medi-Span categorization of "Injection" meaning that subcutaneous pens are included in the rebate guarantees. WellDyne has disagreed stating all injectables including pens should be excluded.

# Appendix – Claims Data Validation

Segal relied on claims data provided by WellDyne to conduct all analyses in this report. Segal conducted the following tests to validate that the data was accurate and sufficient to complete the analyses in the report.

## Monthly Claims Review

Segal reviewed monthly totals of key financial fields in the claims data file in order to validate the following:

- Claims experience coincides with the time period being audited;
- Month-to-month claims trend appears reasonable and there are no spikes or dips in utilization that require additional investigation;
- Claims data is consistent and that the Gross Cost of all drugs (i.e. Ingredient Cost + Dispensing Fee) equals the amount billed to EMHP and its plan members (i.e. Plan Paid Amount + Patient Paid Amount).

The following chart summarizes the paid claim totals by month for the data file supplied by WellDyne for the audit.

Year	Month	Paid Claims	Ingredient Cost + Dispensing Fee	Plan Paid Amount + Patient Paid Amount
2017	1	29,461	\$3,676,146	\$3,671,432
2017	2	27,453	\$3,734,156	\$3,725,987
2017	3	29,902	\$4,272,244	\$4,265,396
2017	4	27,639	\$3,919,196	\$3,913,000
2017	5	29,236	\$4,144,967	\$4,131,486
2017	6	28,283	\$4,074,721	\$4,066,893
2017	7	26,419	\$3,987,416	\$3,981,444
2017	8	27,809	\$4,111,417	\$4,101,076
2017	9	27,081	\$3,993,032	\$3,987,322
2017	10	28,853	\$4,215,189	\$4,206,464
2017	11	29,053	\$4,153,601	\$4,147,773
2017	12	31,184	\$4,342,180	\$4,326,388
2018	1	31,202	\$3,717,428	\$3,716,037
2018	2	28,191	\$3,674,087	\$3,669,546
2018	3	28,292	\$4,074,735	\$4,067,797

Year	Month	Paid Claims	Ingredient Cost + Dispensing Fee	Plan Paid Amount + Patient Paid Amount
2018	4	27,244	\$3,864,915	\$3,858,801
2018	5	28,604	\$3,936,557	\$3,929,433
2018	6	27,079	\$3,763,899	\$3,758,097
2018	7	27,642	\$4,195,048	\$4,188,500
2018	8	28,603	\$4,096,754	\$4,088,843
2018	9	26,261	\$3,557,067	\$3,551,577
2018	10	31,023	\$4,410,747	\$4,406,683
2018	11	27,952	\$4,161,567	\$4,152,924
2018	12	31,196	\$4,237,906	\$4,229,847
		<b>685,662</b>	<b>\$96,314,975</b>	<b>\$96,142,746</b>

*\* Segal found 1,488 claims that had lower patient pay amount due to the Dispense as Written (DAW) penalty amounts, which was paid by the member with no penalty to the plan.*

Segal observed reasonable claims amounts month-to-month and no anomalous costs, determining that the claims data was valid to use for the remaining analyses in this report. Based on the above, Segal concluded that the data file accurately and completely represents the claims adjudicated during the audit period and may be used to complete the audit.

## AWP Medi-Span® Review

Segal used an in-house Medi-Span® pricing source file to independently validate the accuracy of the Average Wholesale Price<sup>11</sup> (AWP) provided by WellDyne for each claim. This review of the claims file is limited to claims with drugs that can be found in the Medi-Span® database. Compound drug claims submitted with representative National Drug Codes (NDC) such as “0000000000”, invalid NDCs, missing NDCs, or NDCs with an inactive pricing record are some of the reasons why claims would not be included in this review.

The following chart summarizes some of the key statistics reviewed during the AWP validation:

Year	Total Claims	AWP Matched Claims	% Matched Claims	Total AWP – PBM	Total AWP – Segal	AWP \$ Diff.	AWP % Diff.
2017	342,373	315,608	92.18%	\$111,403,402	\$110,293,210	\$1,110,192	1.00%
2018	343,289	320,467	93.35%	\$111,481,449	\$110,581,725	\$899,724	0.81%

The AWP provided on WellDyne’s claims file matched Segal’s independent Medi-Span® file for over 92% (2017) and 93% (2018) of claims by count, respectively, resulting in an aggregate difference in the total AWP that is less than 1%. While this is not within Segal’s tolerance for reasonable deviation, Segal has found the issues to be a result of difference in rounding. A second data set was provided on March 15, 2021 by WellDyne that contained the same issues as the initial data set.

**The remaining analyses in the report utilize Segal’s Medi-Span® AWP information.**

<sup>11</sup> The Average Wholesale Price (AWP) is a measurement of the price paid by pharmacies to purchase drug products from wholesalers in the supply chain. The most common source for AWP data for drug pricing comes from Medi-Span. AWP has been used to determine third-party reimbursement throughout the health care industry because third party payers have no other reliable method of obtaining real market prices.

## Excluded Claims Review

For this portion of the review, Segal reviewed the claims that were not included in the measurement and reconciliation of pricing terms due to contractual exclusion language.

The Achieved Discounts are included for illustrative purposes. Overall Totals are calculated by adding the Exclusion Totals and the AWP Discounts charts under Analysis and Supporting Calculations section (Pages 8 through 12).

*January 1, 2017 through December 31, 2017*

Dispensing Channel / Drug Source	Claim Count	Average Wholesale Price	Achieved Discount	Billed Ingredient Cost	Claims Percentage of Total*	AWP Percentage of Total	Billed Ingredient Cost Percentage of Total
Coordination of Benefits (COB)	1,664	\$754,187	82.46%	\$132,254	0.49%	0.68%	0.27%
Compounds	168	\$0	0.00%	\$22,984	0.05%	0.00%	0.05%
Intercept Program	1,693	\$10,229,181	83.20%	\$1,718,605	0.49%	9.27%	3.54%
Long Term Care (LTC)	1,533	\$264,938	56.06%	\$116,414	0.45%	0.24%	0.24%
Over the Counter (OTC)	3,776	\$723,654	25.30%	\$540,566	1.10%	0.66%	1.11%
Usual and Customary (U&C)	1,152	\$409,072	37.00%	\$257,706	0.34%	0.37%	0.53%
Veterans Administration (VA)	2	\$58	94.83%	\$3	0.00%	0.00%	0.00%
<b>Exclusion Totals</b>	<b>9,988</b>	<b>\$12,381,090</b>	<b>-</b>	<b>\$2,788,532</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Overall Totals</b>	<b>342,373</b>	<b>\$110,295,026</b>	<b>-</b>	<b>\$48,498,788</b>	<b>-</b>	<b>-</b>	<b>-</b>

*January 1, 2018*

Dispensing Channel / Drug Source	Claim Count	Average Wholesale Price	Achieved Discount	Billed Ingredient Cost	Claims Percentage of Total*	AWP Percentage of Total	Billed Ingredient Cost Percentage of Total
Coordination of Benefits (COB)	296	\$54,672	90.39%	\$5,253	0.95%	0.59%	0.14%
Compounds	14	\$0	0.00%	\$2,317	0.04%	0.00%	0.06%
Intercept Program	120	\$820,916	91.95%	\$66,066	0.38%	8.86%	1.78%
Long Term Care (LTC)	101	\$14,352	62.43%	\$5,392	0.32%	0.15%	0.15%
Over the Counter (OTC)	322	\$54,875	25.76%	\$40,738	1.03%	0.59%	1.10%
Usual and Customary (U&C)	111	\$27,371	44.56%	\$15,175	0.36%	0.30%	0.41%
<b>Exclusion Totals</b>	<b>964</b>	<b>\$972,186</b>	<b>-</b>	<b>\$134,941</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Overall Totals</b>	<b>31,202</b>	<b>\$9,267,548</b>	<b>-</b>	<b>\$3,705,656</b>	<b>-</b>	<b>-</b>	<b>-</b>

*February 1, 2018 through December 31, 2018*

Dispensing Channel / Drug Source	Claim Count	Average Wholesale Price	Achieved Discount	Billed Ingredient Cost	Claims Percentage of Total*	AWP Percentage of Total	Billed Ingredient Cost Percentage of Total
Coordination of Benefits (COB)	2,285	\$477,610	84.35%	\$74,737	0.74%	0.51%	0.21%
Compounds	111	\$0	0.00%	\$17,979	0.04%	0.00%	0.05%
Intercept Program	1,411	\$9,294,484	81.77%	\$1,694,233	0.45%	10.02%	4.65%
Long Term Care (LTC)	1,118	\$197,210	63.40%	\$72,178	0.36%	0.19%	0.16%
Over the Counter (OTC)	3,375	\$587,224	23.60%	\$448,623	1.08%	0.58%	1.02%
Usual and Customary (U&C)	1,529	\$369,052	56.33%	\$161,168	0.49%	0.36%	0.37%
Veterans Administration (VA)	22	\$1,649	90.30%	\$160	0.01%	0.00%	0.00%
<b>Exclusion Totals</b>	<b>9,827</b>	<b>\$10,923,477</b>	<b>-</b>	<b>\$2,468,543</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Overall Totals</b>	<b>312,087</b>	<b>\$101,321,640</b>	<b>-</b>	<b>\$43,851,187</b>	<b>-</b>	<b>-</b>	<b>-</b>