

COUNTY OF MILWAUKEE

Milwaukee, Wisconsin

**WRAPAROUND MILWAUKEE INCURRED YEAR
FINANCIAL REPORTING SUMMARY**

Including Independent Auditors' Report

For the Years Ended December 31, 2017, 2016 and 2015

COUNTY OF MILWAUKEE

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For the Years Ended December 31, 2017, 2016 and 2015

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INDEPENDENT AUDITORS' REPORT

To the Milwaukee County Mental Health Board
and to the Management of the Milwaukee
County Department of Health and Human
Services and Behavioral Health Division
Milwaukee, Wisconsin

Report on the Financial Report

We have audited the accompanying Wraparound Milwaukee Incurred Year Financial Reporting Summary – Exhibits 3 and 4 of the County of Milwaukee, Wisconsin, for each of the three years ended December 31, 2017, 2016 and 2015, and the related notes (the financial report).

Management's Responsibility for the Financial Report

Management is responsible for the preparation and fair presentation of the financial report in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the historical summaries that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on the financial report based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial report is free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial report. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial report, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial report in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial report referred to above presents fairly, in all material respects, the total claim payments to providers and administrative expenses described in Note I of the Notes to the Financial Report for each of the three years ended December 31, 2017, 2016 and 2015, in accordance with accounting principles generally accepted in the United States of America.

Emphasis of Matter

We draw attention to Note I to the financial report, which describes that the accompanying financial report was prepared for the purpose of complying with CMS Citation 438.3(m) and is not intended to be a complete presentation of the County of Milwaukee's revenues and expenses. Our opinion is not modified with respect to this matter.

Baker Tilly Virchawwala, LLP

Milwaukee, Wisconsin
January 30, 2019

FINANCIAL REPORT

Wisconsin Department of Health Services
Wraparound Milwaukee Incurred Year Financial Reporting
Services Provided in CY 2015, CY 2016, and CY 2017 and Paid Through 2/28/2018
Version Summary

Version 1	Initial version
Version 2	Changed reporting dates, updated member months in Exhibit 2 to report the numbers included versus exclude from state capitation, updated the columns in Exhibits 3 and 4 to identify services fully covered, partially covered, and not covered by state capitation, added Treatment Foster Home and case management / care coordination to Exhibit 3, added the Exhibit 5 blank documentation tab, locked model so only the green input cells and Exhibit 5 documentation tab can be completed, and made other minor updates.
Version 3	Changed reporting dates, added flexibility to labels for CY or SFY reporting, added waived member cost sharing and a claims allocation description box in Exhibit 3, added more detailed rows in Exhibit 4, added an Exhibit 6 tab to compare to financial statements, added MLR calculation in Exhibit 7, clarified some instructions (claims reserves or recovery estimates, administrative expenses for sub-capitated contracts, and specific WAM services provided by Milwaukee County staff), and other minor updates.

Wisconsin Department of Health Services
Wraparound Milwaukee Incurred Year Financial Reporting
Services Provided in CY 2015, CY 2016, and CY 2017 and Paid Through 2/28/2018
Instructions

The purpose of this template is to capture incurred year financial information for the CCF and WAM program as contracted entities with the Wisconsin Department of Human Services.

- 1 Financial information should be completed with claims paid through February 28, 2018 and submitted to DHS by March 23, 2018 to be used for SFY 2019 rate development. Preferably, we would like state fiscal year (i.e., July to June) information entered for the years ending 2015, 2016 and 2017. However, calendar year information can be entered, if needed, by entering 'CY' in cell B31 of Exhibit 1. Prior year amounts (i.e., 2015 and 2016) only need to be re-submitted if there are changes from the prior financial template submitted.
- 2 Submit completed electronic copies to the BFM email box: (DHSDHCAABFM@dhs.wisconsin.gov).
- 3 Only enter information in cells that are shaded green with blue text.
- 4 The data used to create these reports should be stored and may be audited by DHS.
- 5 Version tab tracks each version of the file used.
- 6 In the Exhibit 1 certification statement, fill in the organization name, CEO or CFO information and signature. Signatures can be handled in two ways. Exhibit 1 can be signed and submitted electronically in PDF format separately from the Excel file. Alternatively, the Exhibit 1 tab may contain an electronic signature with only that tab password protected. This tab also contains the preparer's information and assigns the reporting period (including state fiscal year versus calendar year) for the other tabs. In subsequent years, the dates on this tab can be updated to reflect future reporting time periods. You may also add notes in Exhibit 2, enter incurred year member months for members covered versus not covered under state capitalization, revenue by various groupings, and surplus by year, along with the methodology used for any of the claim regardless of when the claim was paid. Enter claims net of any third party liability. Include any estimates for claim reserves or future recoveries (e.g., subrogation) for the incurred year, as appropriate, based on historical results and document any of these amounts in Exhibit 5. Please use the following definitions:

 - *Internal Department Cost Allocation: These are claim costs allocated from internal providers employed by CCF or WAM (e.g., based on time).
 - *A related party is an entity that is associated with the HMO by any form of common, privately held ownership, control, or investment (e.g., another government agency).
 - *Related Party Cost Allocation: These are claim costs allocated from related parties.
 - *Related Party Fee-For-Service (FFS) Claims: These are claims paid to related parties based on services incurred.
 - *Related Party Sub-Capitated Claims: These are claims where a related party receives a fixed amount (e.g., an amount per member per month) to take the financial risk of the actual claims incurred. Claim amounts should exclude any portion of sub-capitalization for administrative expenses. Any administrative expense portion should be excluded from Exhibit 3 and reported in Exhibit 4.
 - *External Provider FFS Claims: These are claims paid to external providers based on services incurred.
 - *External Provider Sub-Capitated Claims: These are claims where an external provider receives a fixed amount to take the financial risk of actual claims incurred. Claim amounts should exclude any portion of sub-capitalization for administrative expenses. Any administrative expense portion should be excluded from Exhibit 3 and reported in Exhibit 4.

- Waived member cost sharing for Medicaid covered benefits should only be reported when cost sharing is intentionally not collected by providers through agreement with CCF or WAM
- WAM specific instructions: Report claims for 'WAM services' (wellness clinic visits, eligibility, and screening by Milwaukee County staff) in the appropriate rows (e.g., internal or related party) in the 'care coordination / case management' and 'other covered services' columns and exclude these amounts from the administrative expense tab.
- In Exhibit 4, enter incurred year administrative expense by year for covered and partially covered services under the state capitalization versus services not covered under the state capitation. Please use the following definitions for administrative costs in Exhibit 4, along with generally accepted accounting principles (GAAP):

 - *MLR Qualified Care Coordination and Care Management: These are expenses that qualify as activities that improve health care quality in a minimum medical loss ratio (MLR) calculation. The activities must meet the definition in 45CFR158.150(b) from the private insurance MLR rule (which includes 45CFR158.151 related to health information technology) or be specific to Medicaid managed care External Quality Review in 42CFR438 Subpart E. The activities cannot be excluded from 45CFR158.150(c) and cannot specifically be excluded from incurred claims.
 - *Community Benefit Expenses can only be reported for plans exempt from Federal income taxes and cannot exceed its Wisconsin Medicaid earned premium for the incurred year multiplied by the greater of 3% or the highest premium tax in
 - *MLR Qualified Direct Fraud Recovery Expenses: These are expenses directly used to recover fraud related claims and cannot exceed the fraud related claim recoveries. These amounts exclude fraud prevention activities not directly related to the recovery of fraud related claims.
 - *Fraud Prevention Activities: These expenses are defined in Section 438.8(e)(4) of the Medicaid regulation. The inclusion of fraud prevention activities is contingent on their inclusion in the commercial market MLR which is currently not allowed. These amounts are excluded from the MLR calculation in this file, however, we are tracking any amounts available in case they can be included in the future. These amounts exclude expenses directly related to the recovery of fraud related claims.
 - *Direct Expense: These are expenses directly related to the member. Examples include, but are not limited to, customer service, enrollment, claims administration, and medical management expenses allocated to the Medicaid line of business.
 - *Indirect Expense: These are expenses indirectly related to the member and may be considered overall company overhead costs. Examples include, but are not limited to, salaries and benefits for the CEO, human resources, accounting, actuarial, and legal expenses allocated to the Medicaid line of business. Facility Related Costs include costs such as rent, utilities, janitorial, maintenance, and depreciation allowed under accounting standards.
 - *Other (please explain): These are administrative expenses that do not fit into one of the other categories. Please explain any amounts entered into this category.

- Also, enter the methodology used for any administrative expense allocations.
- 10 Please use the Exhibit 5 tab, as needed, to enter any documentation or calculations since the template is locked except for the cells shaded green throughout the template and the Exhibit 5 tab. Use of the Exhibit 5 tab is optional.
- 11 Please use the Exhibit 6 tab to compare the financial template results for member months, revenue, claims, and administrative expenses to financial statements and explain any material differences. Preferably, audited GAAP financial statements should be used. Please document any alternative financial statement type used.
- 12 Exhibit 7 shows medical loss ratio results. We included residential cost center (RCC) and treatment foster home (TFH). Medicaid coverage percentages in this exhibit, which are both currently set to the draft 2016 RCC cost report results based on the files DHS provided to us on December 12, 2017. We will update these values as needed. We summarized MLR amounts and incorporated the Medicaid credibility

Exhibit 1

**Wisconsin Department of Health Services
Wraparound Milwaukee Incurred Year Financial Reporting
Services Provided in CY 2015, CY 2016, and CY 2017 and Paid Through 2/28/2018
Certification Statement**

After conducting a reasonably diligent review of the data, documentation and information, I attest that it is accurate, complete and truthful. I understand that whoever knowingly and willfully makes or causes to be made a false statement or representation on the reports may be prosecuted under the applicable state laws. In addition, knowingly and willfully failing to fully and accurately disclose the information requested may result in denial of a request to participate, or where the entity already participates, a termination of a Plan's agreement or contract with the Wisconsin Department of Human Services (DHS). Failure to sign a Certification Statement may result in DHS non-acceptance of the attached reports.

Organization:

Wraparound Milwaukee

By: Program Administrator

Brian McBride

Print name

4/13/2018

Date

Preparer's Contact Information:
Name
Title
Email
Phone #

Years of Financial Data to Include:

Year 1
Year 2
Year 3
Paid Through

Enter CY (Calendar Year) or SFY (State Fiscal Year
2015
2016
2017
2/28/2018
CY

Add notes for any exhibit in the box below:

Reported by Calendar year: 1/1 to 12/31

Exhibit 2

Wisconsin Department of Health Services
Wraparound Milwaukee Incurred Year Financial Reporting
Services Provided in CY 2015, CY 2016, and CY 2017 and Paid Through 2/28/2018

Member Months	CY 2015	CY 2016	CY 2017
(1) Covered by State Capitation	13,254	13,895	13,688
(2) Not Covered by State Capitation	654	840	999
(3)=(1)+(2) Total Member Months	13,908	14,735	14,687
Revenue For Services Covered by State Capitation:			
(4) Capitation Revenue	\$25,276,510	\$27,330,362	\$28,162,359
(5) Other Revenue Sources (Please Explain) ¹			
(6)=(4)+(5) Subtotal Revenue For Services Under State Capitation	\$25,276,510	\$27,330,362	\$28,162,359
Revenue For Services Not Covered by State Capitation:			
(7) Crisis Intervention	\$10,643,337	\$13,433,147	\$13,405,944
(8) Other Revenue Sources	\$19,181,212	\$17,426,670	\$14,488,723
(9)=(7)+(8) Subtotal Revenue For Services Not Covered Under State Capitation	\$29,824,549	\$30,859,818	\$27,894,668
(10)=(6)+(9) Total Revenue	\$55,101,059	\$58,190,180	\$56,057,027
(11) Surplus as of CY End	\$183,604	\$516,616	\$1,427,993

¹For "other" revenue associated with covered services under the state capitation (including any reinsurance offsets to premium), provide a description of each revenue source and its amount by year.

(7) CRISIS INTERVENTION: Wraparound has only billed through July of 2017 and is estimating the annualized yearly total based on the first 7 months of payments. Annualized = YTD*12/7

(8) OTHER REVENUE SOURCES: The Division of Milwaukee Child Protective Services and The Delinquency and Court Services Division (DCSD) pay Wraparound Milwaukee on a case-rate basis for youth under court orders. 2015 \$8,392,188; 2016 \$7,121,164; 2017 \$5,142,874
WAM also reports revenue from the CHIPS program as OTHER: 2015 \$10,789,024; 2016 \$10,305,506; 2017 \$9,345,850

Provide a description of how any revenues were allocated between various components.

Revenue reported based on Medicaid Eligible percentage of clients. This impacts row 20, (8) Other Revenue Sources: 2015 = 95.3%, 2016 = 94.3%.
2017 = 93.2%. Revenue is allocated by date of service provided, regardless of date of payment

Exhibit 3

Wisconsin Department of Health Services

Wraparound Milwaukee Incurred Year-end Financial Reporting
 Services Provided in CY 2015, CY 2016, and CY 2017 and Paid Through 2/28/2018
 Claim Payments to Provider, Net of Third Party Liability.

Care Coordination / Case Management ¹	Services Fully Covered by State Capitalization			Services Partially Covered by State Capitalization			Services Not Covered by State Capitalization			Cost-Sharing for Medicaid-Covered Benefits
	Care Specialist / Other Covered Services ¹	Peer Specialist In Lieu Of Services (Please Explain)*	Other In Lieu Of Services (Please Explain)*	Residential Care Centers (RCC)	Treatment Foster Home (TFH)	Subtotal	Group Home	Crisis Intervention	Other Non-Covered Services	Subtotal
CY 2015				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Internal Department Cost Allocation				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Related Party Cost Allocation				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Related Party Fee-For-Service (FFS) Claims				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Related Party Sub-Capitalized Claims				\$0	\$0	\$0	\$0	\$0	\$0	\$0
External Provider FFS Claims				\$10,895,482	\$3,162,758	\$14,058,240	\$4,868,722	\$6,492,684	\$12,448,132	\$13,869,538
External Provider Sub-Capitalized Claims				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total				\$10,895,482	\$3,162,758	\$14,058,240	\$5,562,075	\$9,201,282	\$17,833,565	\$17,836,802
CY 2016				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Internal Department Cost Allocation				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Related Party Cost Allocation				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Related Party Fee-For-Service (FFS) Claims				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Related Party Sub-Capitalized Claims				\$0	\$0	\$0	\$0	\$0	\$0	\$0
External Provider FFS Claims				\$8,821,727	\$2,988,426	\$11,810,153	\$4,179,638	\$7,170,256	\$2,869,736	\$14,219,580
External Provider Sub-Capitalized Claims				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total				\$8,821,727	\$2,988,426	\$11,810,153	\$4,911,977	\$10,236,664	\$5,559,840	\$18,708,381
CY 2017				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Internal Department Cost Allocation				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Related Party Cost Allocation				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Related Party Fee-For-Service (FFS) Claims				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Related Party Sub-Capitalized Claims				\$0	\$0	\$0	\$0	\$0	\$0	\$0
External Provider FFS Claims				\$7,865,794	\$3,115,497	\$10,981,291	\$4,019,195	\$5,926,207	\$1,034,710	\$12,980,112
External Provider Sub-Capitalized Claims				\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total				\$7,865,794	\$3,115,497	\$10,981,291	\$4,019,195	\$7,983,097	\$3,638,473	\$15,559,765

¹WAM specific instructions. Include amounts for services performed by Milwaukee County staff (wellness clinic visits, eligibility, and screening) in the appropriate rows (e.g., internal or related party) in the care coordination / case management and other covered services columns and exclude these amounts from the admin:
²For "other" claims associated with services covered by the state capitalization (including any reinsurance recoveries), provide a description of each claim source and its amount by year.

NOTE: WITH THE EXCEPTION OF EXTERNAL PROVIDER FFS CLAIMS, amounts are reported using the TOTAL payments for the year times the average Medicaid-eligible percentage each year. 2015 - 95.3%, 2016 - 94.3%, 2017 - 93.2%. One-hundred percent of External Provider FFS Claims were included, as 100% of reported encounter data is for Medicaid-eligible enrollees, for months specific to each enrollee's eligibility. Lines for "External Provider FFS Claims" reflect Encounter Data. See sheet Exhibit 5-Documentation for the specifics as to which costs are included in each category. The Other Covered Services category includes those coded with "MA" in Exhibit 5.

Provide a description of how any claims were allocated between various components
 NOTE: WITH THE EXCEPTION OF EXTERNAL PROVIDER FFS CLAIMS, amounts are reported using the TOTAL payments for the year times the average Medicaid-eligible percentage each year. 2015 - 95.3%, 2016 - 94.3%, 2017 - 93.2%. One-hundred percent of External Provider FFS Claims were included, as 100% of reported encounter data is for Medicaid-eligible enrollees, for months specific to each enrollee's eligibility. Lines for "External Provider FFS Claims" reflect Encounter Data. DHS advised WAM to also include services that are not reflected in Encounter Data where they are Not Covered by State Capitalization. These amounts include:
 1) Related Party Cost Allocation, Crisis includes staffing on our Children's Mobile Crisis Team by contracted staff
 2) Related Party Cost Allocation, Other Non-Covered Services includes costs for Journey House (a housing option for our enrollees) and day treatment services provided to

Exhibit 4
Wisconsin Department of Health Services
Wraparound Milwaukee Incurred Year Financial Reporting
Services Provided in CY 2015, CY 2016, and CY 2017 and Paid Through 2/28/2018
Administrative Expenses

Administrative Expense Categories	Services Fully Covered by State Capitation			Services Partially Covered by State Capitation			Services Not Covered by State Capitation			Total
	CY 2015	CY 2016	CY 2017	CY 2015	CY 2016	CY 2017	CY 2015	CY 2016	CY 2017	
MLR Qualified Quality Improvement Expense	\$750,714	\$996,263	\$1,000,320	\$92,006	\$79,601	\$68,084	\$116,736	\$126,084	\$96,387	\$750,714
MLR Qualified Taxes, Licensing, and Regulatory Fees	\$12,412	\$32,599	\$21,468	\$23,526	\$29,173	\$29,283	\$29,850	\$46,212	\$41,468	\$320,519
Licensing and Regulatory Fees ¹	\$31,046	\$48,563	\$52,259	\$31,041	\$31,196	\$31,448	\$554,511	\$505,633	\$448,127	\$0
Community Benefit Expenses ¹	\$576,725	\$33,355	\$564,740							\$0
Other										\$0
Fraud Prevention Activities										\$0
Sales and Marketing										\$0
Direct Expense:										\$0
Care Management (not already reported in claims)										\$0
Claims Administration										\$0
Customer Service										\$0
Enrollment										\$0
Other										\$0
Indirect Expense:										\$0
Accounting and Finance										\$0
Executive										\$0
Compliance and Legal										\$0
Facility Related Costs										\$0
Human Resources										\$0
Information Technology										\$0
Provide Network Management										\$0
Other										\$0
Other (please explain) ³										\$0
Total Administrative Expense	\$2,242,139	\$2,822,211	\$3,223,359	\$1,130,197	\$1,096,885	\$1,245,658	\$1,433,979	\$1,737,558	\$1,764,036	\$4,806,315
										\$5,656,555
										\$6,233,123

¹ Community Benefit Expenses can only be reported for plans exempt from federal income taxes and cannot exceed its Wisconsin Medicaid earned premium for the incurred year multiplied by the greater of 3% or the highest premium tax in Wisconsin

² MLR Qualified Direct Fraud Recovery Expenses are expenses directly used to recover fraud related claims and cannot exceed fraud related claim recoveries

³ Please describe any "Other" administrative expense in the comment box below.

"Other" Administrative Expense Description:

Description of Methodologies Used to Allocate Administrative Expense Expenditures:

Direct Admin Expenses are from WAM records for services plus Milw Co Payroll records. Expenses related to internal Milw Co staff includes Fringe Benefits. These expenses were multiplied by the Medicaid Eligible % of clients per year. 2015 95.3% - 2016 94.3% - 2017 93.2% = Subtracted the amount of WAM Services included in tab Exh 3 Claims.

The category Direct Expense Care Management (row 18) includes the following Fully Covered services provided directly to clients.

These are WAM Services that were not included in Encounter data. 1) Internal Dept Cols including Wellness Clinic and Eligibility/Screening assessments done by Milwaukee County staff. 2) Related Party Cost Allocation including Care Coordination/Case Management includes contracted

Screening and Assessment staff as well as Clinical Consultants.

All other Expenses on this tab were then allocated to "Fully Covered", "Partially Covered" and "Not Covered" based on the % of direct service expenses in each category in Exh 3 + row 18 of Exh 4.

Services Fully Covered Services Partially Covered Services Not Covered

2015-2016-2017-2015-2016-2017-2015-2016-2017

ERI-015
Wisconsin Department of Health Services
and Milwaukee Incurred Year Financial Reporting
in CY 2015, CY 2016, and CY 2017 and Paid Through 2/28/2018
Documentation and Calculations are included

Please use this tab as needed to enter any documentation or calculations since the template is locked except for the cells shaded green throughout the template and the Exhibit 5 tab. Use of this tab is optional.

Exhibit 7

**Wisconsin Department of Health Services
Wraparound Milwaukee Incurred Year Financial Reporting
Services Provided in CY 2015, CY 2016, and CY 2017 and Paid Through 2/28/2018
Medical Loss Ratio (MLR) Reporting**

	CY 2015	CY 2016	CY 2017
Member Months Covered by State Capitation	13,254	13,895	13,688
MLR Numerator	\$23,349,905	\$23,400,078	\$22,975,952
MLR Denominator	\$25,276,510	\$27,330,362	\$28,162,359
Unadjusted MLR	92.4%	85.6%	81.6%
Credibility Adjustment	5.5%	5.4%	5.5%
Adjusted MLR	97.9%	91.1%	87.0%

Residential Care Center (RCC) Medicaid Covered %
Treatment Foster Home (TFH) Medicaid Covered %
Combined RCC and TFH Medicaid Covered %

Note: These amounts will be determined from cost report results

Residential Care Center (RCC) Medicaid Covered %	46.0%	46.0%
Treatment Foster Home (TFH) Medicaid Covered %	38.2%	38.2%
Combined RCC and TFH Medicaid Covered %	44.2%	44.0%

**Credibility Adjustment Table
From CMS bulletin Dated July 31, 2017**

Member	Months	Credibility Adjustment
	< 5,400	non-credible
	5,400	8.4%
	12,000	5.7%
	24,000	4.0%
	48,000	2.9%
	96,000	2.0%
	192,000	1.5%
	380,000	1.0%
	> 380,000	fully credible

MLR Numerator Components:

Claims	\$23,349,905	\$23,400,078	\$22,975,952
MLR Qualified Quality Improvement Expense	\$0	\$0	\$0
MLR Qualified Direct Fraud Recovery Expenses ¹	\$0	\$0	\$0

MLR Denominator Components:

Capitation Revenue	\$25,276,510	\$27,330,362	\$28,162,359
MLR Qualified Taxes, Licensing, and Regulatory Fees	\$0	\$0	\$0
Waived Member Cost Sharing for Medicaid Covered Benefits	\$0	\$0	\$0

¹ Expenses directly related to fraud recoveries may not exceed the amount of fraud recoveries.

COUNTY OF MILWAUKEE

NOTES TO THE FINANCIAL REPORT For the Years Ended December 31, 2017, 2016 and 2015

NOTE I – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The accounting policies of the County of Milwaukee, Wisconsin conform to generally accepted accounting principles as applicable to governmental units.

Through its contract with the State of Wisconsin Department of Health Services, the County of Milwaukee is required to submit a financial report which meets the requirements of Title 42 U.S. *Code of Federal Regulations*, CMS Citation 438.3(m). This financial report includes the revenues and expenditures incurred in relation to the County of Milwaukee's Wraparound Milwaukee program, which represents only a portion of the activities of the County of Milwaukee.

Expenditures and revenues presented in the financial report are recorded by the County of Milwaukee using the modified-accrual basis of accounting.