

REPORT ON EXAMINATION
OF
CENTENE VENTURE COMPANY KANSAS
8325 LENEXA DRIVE
LENEXA, KANSAS 66214
AS OF
DECEMBER 31, 2022

FILED

June 28, 2024

VICKI SCHMIDT
Commissioner of Insurance

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Topeka, Kansas
June 7, 2024

Honorable Vicki Schmidt
Commissioner of Insurance
Kansas Department of Insurance
1300 SW Arrowhead Rd
Topeka, Kansas 66604-4019

Dear Commissioner:

In accordance with your authorization and pursuant to K.S.A. 40-222, an examination has been conducted of the financial condition and business affairs of:

CENTENE VENTURE COMPANY KANSAS

with its statutory home office at:

**8325 LENEXA DRIVE,
LENEXA, KANSAS 66214**

and main administrative office at:

**7700 FORSYTH BOULEVARD
ST. LOUIS, MISSOURI 631095**

hereinafter referred to as the “Company” or “CVCK.” The following report on such examination is respectfully submitted.

SCOPE OF EXAMINATION

The examiners have performed a multi-state financial examination of the Company, a Kansas-domiciled health maintenance organization (“HMO”). The last examination was an organizational examination as of February 18, 2019. This examination covers the period from February 19, 2019, through December 31, 2022. This examination was performed as part of the multi-state coordinated examination of the Centene Group (“Centene” “Centene Corporation” or “Group”) of regulated entities

wherein the Texas Department of Insurance (“TDI”) was the lead state.

The examination was conducted in accordance with the rules, regulations, and directives of the Kansas Department of Insurance (“Department”) and the observed guidelines and procedures contained in the National Association of Insurance Commissioners (“NAIC”) *Financial Condition Examiners Handbook* (“Handbook”). The Handbook requires that the examiners plan and perform the examination to evaluate the financial condition, assess corporate governance, identify current and prospective risks of the Company, and evaluate system controls and procedures used to mitigate those risks. An examination also includes identifying and evaluating significant risks that could cause an insurer’s surplus to be materially misstated both currently and prospectively.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process. This may include assessing significant estimates made by management and evaluating management’s compliance with Statutory Accounting Principles.

Those activities considered in the examination as key or critical to the Company included Investments, Reinsurance Ceded, Premiums, Related Party, Underwriting, Claims and Reserving. The examination also included a review and evaluation of information technology general controls.

The examination does not attest to the fair presentation of the financial statements included herein. If, during the course of the examination, an adjustment is identified, the impact of such adjustment is documented separately following the Company’s financial statements.

This examination report includes significant findings of fact, as mentioned in K.S.A.

40-222, and general information about the insurer and its financial condition. There may be other items identified during the examination that, due to their nature (e.g., subjective conclusions, proprietary information, etc.), are not included within the examination report but separately communicated to other regulators and/or the Company.

Independent Audit Reports

Financial statements of the Company were audited by KPMG, LLP of St. Louis, Missouri for the years ending December 31, 2019, through December 31, 2022. In each of the years under examination, the auditors concluded that the financial statements of the Company present fairly, in all material respects, the admitted assets, liabilities and policyholders' surplus of the Company as of December 31, 2022, and the results of its operations and its cash flows for the years then ended in accordance with the statutory accounting practices prescribed or permitted by the Department.

The independent auditor's workpapers were reviewed and analyzed by the examiners. Significant reliance was placed on select workpapers during this examination.

Actuarial Review

Michael J. Schooley, ASA, MAAA, an employee of Centene Management Company, LLC, a wholly-owned subsidiary of Centene Corporation, was appointed to perform a review of the Company's actuarial practices and reserves as of December 31, 2022. The appointed actuary's review consisted of evaluating assumptions, methodologies, and calculations utilized by the Company in its reserve setting process.

SUMMARY OF SIGNIFICANT FINDINGS

There were no significant findings of fact that warranted inclusion in this Report of Examination.

COMPANY HISTORY

General

The Company was incorporated in Kansas on November 1, 2018, under the name Centene Venture Company Kansas as a health maintenance organization under the provisions of K.S.A. 40-3201 et seq.

The Company began operations on January 1, 2019, as an HMO under Article 32, Chapter 40 of the Kansas Statutes Annotated. CVCK is wholly owned by Next Door Neighbors, Inc., (“NDNI”) which is wholly owned by Next Door Neighbors, LLC (“NDNL”), which is a joint venture between Centene Corporation and Ascension Care Management, LLC (“ACM”).

CVCK was formed for the purpose of providing comprehensive managed healthcare services to Medicare eligible residents in Kansas. The Company operates as an Independent Healthcare Arrangement HMO, where the Company enters into participating provider agreements with the appropriate number of primary care physicians, hospitals, and ancillary providers contracted within the proposed service area. The service areas are Butler, Cowley, Harvey, Kingman, Sedgwick, and Sumner counties.

Capital Stock

As of December 31, 2022, the Company had 3,000 shares of common stock authorized, issued, and outstanding with a \$1 par value, one hundred percent (100%) of the Company’s stock was owned by NDNI.

Dividends and Capital Contributions

The Company received capital contributions of \$11,150,000 in 2020 and \$2,900,000 in 2021 from its parent NDNI. There were no dividends paid by the Company

during the examination period.

CORPORATE RECORDS

The Company's articles of incorporation and bylaws were reviewed. There were no amendments to the articles of incorporation or the bylaws during the examination period.

MANAGEMENT AND CONTROL

Ownership

As of December 31, 2022, NDNI owns one hundred (100%) of the Company's outstanding capital stock. NDNI is wholly owned by Next Door Neighbors, LLC. Centene Corporation owns sixty percent (60%) of the outstanding stock of NDNL, with ACM as the owner of the remaining forty percent (40%).

Board of Directors

The Company's bylaws consist of nine (9) articles that provide the framework for the operation, management, and control of the Company. The Company is managed under the direction of its board of directors ("Board").

The Board members elected and serving as of December 31, 2022.were as follows:

<u>Name</u>	<u>Principal Occupation and Business Affiliation</u>
Kirk D. Fischer	Senior VP, Network Development & Contracting Centene
Kate N. Casso	Senior VP, Controller & Chief Accounting Officer Centene
Richard J. Y. Chong	Senior VP, Business Operations Centene
Dr. Michael G. Skoch	Hospitalist Nebraska Methodist Hospital

Dr. Samer Antonios	Chief Clinical Officer, Chief Medical Officer & Hospitalist Ascension Via Christi
Adam S. Duvall	Senior Director, Finance Ascension Health

Committees

The Company’s bylaws indicate that the Board may designate an Executive Committee if there are five (5) or more directors, three (3) or more directors to constitute an Executive Committee. The Board may create other committees as the Board deems advisable from time to time. The Board has not appointed any committees over the examination period. All committees of the Board operate at the Centene Corporation level.

Officers

Pursuant to the bylaws, the Company will have a President, a Secretary, a Treasurer, and such Vice Presidents, Assistant Secretaries, Assistant Treasurers, or other officers as the Board may elect from time to time. The bylaws direct that the officers be elected at the annual meeting of the Board and shall hold office until death, resignation, retirement, removal, disqualification or until successor is elected and qualified. Any two (2) or more offices may be held by the same person except the offices of president and secretary. No officer may act in more than one capacity where action of two (2) or more officers are required. The following is a listing of officers and their position(s) held as of December 31, 2022:

<u>Name</u>	<u>Office</u>
Thomas R. Lindquist	President
James E. Snyder	Treasurer
Janet R. Alonzo	Secretary
Tricia L. Dinkelman	Vice President of Tax

Charlie W. Fields, Jr.

Assistant Secretary

INSURANCE HOLDING COMPANY SYSTEM

K.S.A. 40-3305 requires a domestic insurer that is part of an insurance holding company system to file appropriate registration statements with the Commissioner of Insurance. The Company has submitted Form “B” and “C” registration statements to the Department for each of the years under examination. A review of the registration statements indicated that the items and events pertaining to the Company were properly reported as required by statute.

The abbreviated organizational chart below illustrates the identities and intercompany relationships among insurance and non-insurance companies within the Centene Corporation thereof, as of December 31, 2022. Ownership percentage is noted in parentheses when less than 100% and the Kansas domiciled insurer is bolded.

- Centene Corporation (Delaware)
 - Sunflower State Health Plan, Inc. (Kansas)
 - Iowa Total Care, Inc. (Iowa)
 - Bankers Reserve Life Insurance Company of Wisconsin (Wisconsin)
 - Celtic Group, Inc. (Delaware)
 - Celtic Insurance Company (Illinois)
 - Coordinated Care Corporation (Indiana)
 - Centene Management Company, LLC (Wisconsin)
 - Centene Holdings, LLC (Delaware)
 - Centene Company of Texas, LP (99%) (Texas)
 - CCTX Holdings, LLC (Delaware)
 - Centene Company of Texas, LP (1%) (Texas)
 - Envolve Holdings, LLC (Delaware)
 - Cenpatio Behavioral Health, LLC (California)
 - Envolve, Inc. (Delaware)
 - Envolve PeopleCare, Inc. (Delaware)
 - Envolve Benefit Options, Inc. (Delaware)
 - Envolve Vision Benefits, Inc. (Delaware)
 - Envolve Vision of Texas, Inc. (Texas)
 - Envolve Vision, Inc. (Delaware)
 - Envolve Vision of Florida, Inc. (Florida)
 - Envolve Total Vision, Inc. (Delaware)
 - Envolve Optical, Inc. (Delaware)
 - Envolve Dental, Inc. (Delaware)

Envolve Dental of Florida, Inc. (Florida)
 Envolve Dental of Texas, Inc. (Texas)
 Centene Pharmacy Services, Inc. (Delaware)
 MeridianRx, LLC (Michigan)
 U.S. Medical Management Holdings, Inc. (Delaware)
 Comprehensive Health Management, LLC (Florida)
 Centene Health Plan Holdings, Inc. (Delaware)
 Wellcare Health Plans, Inc. (Delaware)
 WCG Health Management, Inc. (Delaware)
 The WellCare Management Group, Inc. (New York)
 HealthSmart Benefits Management, LLC (Texas)
 Magellan Health, Inc. (Delaware)
 Magellan Pharmacy Services, Inc. (Delaware)
 Magellan Healthcare, Inc. (Delaware)
 National Imaging Associates, Inc. (Delaware)
 Next Door Neighbors, LLC (60%) (Delaware)
 Next Door Neighbors, Inc. (Delaware)
 Centene Venture Company Alabama Health Plan, Inc. (Alabama)
 Centene Venture Company Illinois (Illinois)
 Centene Venture Company Kansas (Kansas)
 Centene Venture Company Florida (Florida)
 Centene Venture Company Indiana, Inc. (Indiana)
 Centene Venture Company Tennessee (Tennessee)
 Centene Venture Insurance Company Texas (Texas)
 Centene Venture Company Michigan (Michigan)
 Specialty Therapeutic Care Holdings, LLC (Delaware)
 Specialty Therapeutic Care, LP (99.99%) (Texas)
 Specialty Therapeutic Care, GP, LLC (Texas)
 Specialty Therapeutic Care, LP (0.01%) (Texas)
 Presonyx, Inc. (Delaware)
 AcariaHealth, Inc. (Delaware)
 Health Net, LLC (Delaware)
 Health Net of California, Inc. (California)
 Health Net Life Insurance Company (California)
 Managed Health Network, LLC (Delaware)
 Managed Health Network (California)
 MHN Services, LLC (California)
 Health Net Federal Services, LLC (Delaware)

Intercompany/Cost Sharing Agreements

The following is a brief description of significant agreements executed with affiliated entities that were in effect as of December 31, 2022.

Management Agreement

Effective July 1, 2019, the Company entered into a Management Agreement with Centene Management Company, LLC (“CMC”), whereby the Company is provided with administrative and support services necessary to fulfill its support of a health care program for an individual or group of individuals including covered services under a government contract. The administrative and support services provided under this agreement include: financial systems and services, claims administration, provider and enrollee services and records, utilization review, quality assurance, program billing and collections, and management information systems.

In return for these services, the Company will reimburse CMC for a sliding scale percentage of revenue, based on volume and type of business written. For Medicare Advantage the fee ranges from 10% to 12%. These percentages will increase or decrease driven by projected revenue increases or decreases, respectively, and is subject to a final accounting based upon the annual revenue confirmed by a certified public accountant. Pursuant to the agreement, the Company incurred \$804,794, \$1,328,905, and \$1,516,816 in 2022, 2021, and 2020, respectively.

Effective January 1, 2024, the Company entered a Management Agreement with CMC that supersedes any prior management agreement or Statement of Work between the Company and CMC.

Management Services Agreement

Effective January 1, 2020, CMC and NDNL entered into a Management Services Agreement, whereby CVCK and CMC entered into a Statement of Work # 3, which was attached to, and is incorporated in the Management Services Agreement. CMC provides certain administrative services to CVCK, including but not limited to product development, enrollment and billing, claims processing, finance and accounting services, and other services/functions. Expenses are reimbursed at cost. CVCK incurred \$1,277,080, \$3,099,989, and \$3,279,478 in 2022, 2021, and 2020, respectively for services provided pursuant to this agreement.

Capital Maintenance Agreement

Effective August 14, 2019, the Company entered into a Capital Maintenance Agreement with Centene Corporation, whereby Centene will contribute or arrange for a subsidiary to contribute capital if the Company's authorized control level falls below 300%. The Company reported a total of \$11,500,000 in capital contributions during 2020 and a total of \$2,900,000 during 2021 from its parent, Next Door Neighbors, Inc.

Pharmacy Benefits Agreement

The Company is a party to a pharmacy benefit management services agreement effective January 1, 2020, with Envolve Pharmacy Solutions, Inc., whereby the Company is provided pharmacy benefit management services to its members. This agreement was restated as an Administrative Pharmacy Services Agreement effective January 1, 2023.

The Company incurred \$3,682,958, \$1,982,575, and \$798,031 for services provided pursuant to this agreement in 2022, 2021, and 2020, respectively.

Vision Services Agreement

The Company is a party to a vision services agreement with Envolve Vision, Inc., effective January 1, 2020, whereby the Company is provided covered vision services to its members.

The Company incurred \$195,891, \$106,090, and \$38,196 for services provided pursuant to this agreement in 2022, 2021, and 2020, respectively.

Dental Services Agreement

The Company is a party to a dental services agreement with Envolve Dental, Inc., effective January 1, 2020, whereby the Company is provided dental benefit management services to its members.

The Company incurred \$459,908, \$167,766, and \$28,662 for services provided pursuant to this agreement in 2022, 2021, and 2020, respectively.

Master Services Agreement

The Company is a party to a master services agreement with Envolve PeopleCare, Inc., effective January 1, 2020, whereby the Company is provided nurse-line triage and life and health management services to its members. This agreement was terminated as of January 1, 2022. The Company paid \$0, \$327, and \$150 for services provided pursuant to this agreement in 2022, 2021, and 2020, respectively.

Tax Sharing Agreement

Effective December 31, 2019, the Company is a party to Centene's Tax Sharing Agreement with its subsidiaries, which requires that all subsidiaries reimburse or recover their portion of the income taxes as calculated on a separate company basis for settlement under the consolidated federal and state income tax returns. For all years

under examination, the Company filed a consolidated federal income tax return with Centene Corporation and its subsidiaries.

HMO Reinsurance Agreement

The Company is a party to an HMO reinsurance agreement with Bankers Reserve Life Insurance Company of Wisconsin (“Bankers Reserve”) to provide stop-loss reinsurance coverage to the Company. Further information regarding this agreement is contained in the Reinsurance section of this report.

Administrative Services Agreement

The Company is a party to an administrative services agreement with Ascension Care Management, LLC, for care and network management services effective January 1, 2020. This agreement was terminated as of January 1, 2022. The Company did not incur any costs associated with this agreement during the examination period.

Participating Provider Agreements

The Company is a party to a participating provider agreement with Ascension via Christi Health, Inc. The Company did not incur any costs associated with this agreement during the examination period.

TERRITORY AND PLAN OF OPERATION

As of December 31, 2022, the Company is authorized to transact business in Kansas. The Company received its Kansas Certificate of Authority on March 22, 2019, under Article 32, Chapter 40 of the Kansas Statutes Annotated.

The Company was formed as an HMO for the purpose of providing comprehensive managed healthcare services to Medicare eligible residents in Kansas.

SELECT FINANCIAL INFORMATION

The exhibit below shows the Company's financial results for the period of December 31, 2019, through December 31, 2022. The financial amounts were obtained from annual statements filed by the Company.

	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>
Admitted Assets	\$1,516,235	\$14,976,861	\$9,936,909	\$11,503,594
Liabilities	7,177	12,547,602	7,128,887	7,462,454
Capital and Surplus	1,509,058	2,429,259	2,808,022	4,041,140
Net Income (Loss)	6,084	(10,183,497)	(2,407,453)	1,453,477
Net Premium Written	0	3,848,580	9,202,859	20,226,597

REINSURANCE

General

The Company's premium activity on a direct written, assumed, and ceded basis for the period under examination is detailed below:

(\$000s omitted)

Premium Type	2019	2020	2021	2022
Direct Premiums Written	\$ 0	\$ 3,852	\$ 9,224	\$ 20,275
Reinsurance Assumed:	0	0	0	0
Reinsurance Ceded:	0	3	21	49
Net Premiums Written	\$ 0	\$ 3,849	\$ 9,203	\$ 20,227

Assumed Reinsurance

The Company did not assume any reinsurance as of December 31, 2022.

Ceded Reinsurance

The Company is a party to an HMO reinsurance agreement with affiliate Bankers Reserve. The agreement term was for January 1, 2022, to January 1, 2023, and covered Medicare Advantage products with a maximum payable per covered person of \$3,000,000. The Company ceded \$48,936 in premiums during 2022 under this

agreement with no recoverable losses.

All reinsurance agreements in effect during the examination period contained insolvency and cancellation clauses as required by K.S.A. 40-221a. All reinsurance agreements reviewed provided for the transfer of risk; however, the Company is contingently liable for all reinsurance losses ceded to others. This contingent liability would become an actual liability in the event an assuming reinsurer fails to perform its obligations under the reinsurance contract.

FINANCIAL STATEMENTS

The following financial statements are based on the statutory financial statements filed by the Company with the Department and present the financial condition of the Company for the period ending December 31, 2022. There were no adjustments to the Company's filed statutory financial statements as a result of this examination.

**CENTENE VENTURE COMPANY KANSAS
STATEMENT OF ASSETS
AS OF DECEMBER 31, 2022**

	Assets	Assets Nonadmitted	Net Admitted Assets
Bonds	\$ 331,971	\$ -	\$ 331,971
Cash and cash equivalents	9,195,491	-	9,195,491
Investment income due and accrued	2,281	-	2,281
Uncollected premiums and agents' balances in the course of collection	1,593	-	1,593
Accrued retrospective premiums	1,061,305	-	1,061,305
Amounts receivable relating to uninsured plans	290,315	-	290,315
Healthcare and other amounts receivable	769,338	304,986	464,352
Aggregate write-ins for other-than invested assets	231,755	75,469	156,286
Total	\$11,884,049	\$380,455	\$11,503,594

**CENTENE VENTURE COMPANY KANSAS
STATEMENT OF LIABILITIES AND SURPLUS
AS OF DECEMBER 31, 2022**

Claims unpaid	\$ 2,905,166
Accrued medical incentive pool and bonus amounts	217,859
Unpaid claims adjustment expenses	27,172
Aggregate health policy reserves	301,340
Premiums received in advance	439
General expenses due or accrued	220,094
Current federal income tax payable and interest thereon	22
Ceded reinsurance premiums payable	4,145
Payable to parent, subsidiaries and affiliates	2,892,746
Liability for amounts held under uninsured plans	893,471
Total liabilities	<u>7,462,454</u>
Common capital stock	3,000
Gross paid in and contributed surplus	15,549,653
Unassigned funds (surplus)	<u>(11,511,513)</u>
Total capital and surplus	<u>4,041,140</u>
Total of liabilities, capital and surplus	<u><u>\$11,503,594</u></u>

**CENTENE VENTURE COMPANY KANSAS
STATEMENT OF REVENUE AND EXPENSES
FOR THE YEAR ENDED DECEMBER 31, 2022**

Member Months	23,523
Net premium income	<u>\$20,226,597</u>
Total	20,226,597
 <u>Hospital and Medical:</u>	
Hospital/medical benefits	15,152,281
Other professional services	954,304
Emergency room and out-of-area	426,590
Prescription drugs	1,058,914
Incentive pool, withheld adjustments and bonus amounts	<u>202,324</u>
Subtotal	17,794,143
 <u>Less:</u>	
Net reinsurance recoveries	<u>0</u>
Total hospital and medical	<u>17,794,143</u>
Claims adjustment expenses	205,195
General administrative expenses	4,094,504
Increase in reserves for accident and health contracts	<u>(3,183,750)</u>
Total underwriting deductions	<u>18,910,362</u>
 Net underwriting gains	 <u>1,316,235</u>
 Net investment income earned	 151,309
Net realized capital losses	<u>0</u>
Net investment gains	151,309
 Net gain or loss from agents' or premium balances charged off	 <u>(14,067)</u>
Net income after capital gains tax and before all other federal income taxes	<u>1,453,477</u>
Federal income taxes incurred	<u>0</u>
Net income	<u><u>\$ 1,453,477</u></u>

**CENTENE VENTURE COMPANY KANSAS
CAPITAL AND SURPLUS ACCOUNT
RECONCILIATION OF CAPITAL AND SURPLUS SINCE LAST EXAMINATION**

	2019	2020	2021	2022
Surplus as regards policyholders, December 31 prior year	\$1,502,974	\$1,509,058	\$2,429,259	\$2,808,022
Net income (loss)	6,084	(10,183,497)	(2,407,453)	1,453,477
Change in net unrealized capital gains or (losses)	-	-	-	8
Change in nonadmitted assets	-	(46,302)	(113,784)	(220,367)
Surplus adjustments – paid in	-	11,150,000	2,900,000	-
Rounding	-	-	-	-
Surplus as regards policyholders, December 31 current year	<u>\$1,509,058</u>	<u>\$2,429,259</u>	<u>\$2,808,022</u>	<u>\$4,041,140</u>

ANALYSIS OF CHANGES IN FINANCIAL STATEMENTS

No adjustments were made to surplus as a result of this examination. The capital and surplus of the Company as of December 31, 2022, of \$4,041,140, was the same amount reported by the Company in its 2022 filed Annual Statement.

COMMENTS ON FINANCIAL STATEMENTS

There were no significant or material findings resulting from the examination that warranted inclusion in this Report on Examination.

SUBSEQUENT EVENTS

Subsequent to the examination date, effective May 1, 2023, Centene acquired ACM's forty percent (40%) ownership of Next Door Neighbors, LLC. After the acquisition, Centene owns one hundred percent (100%) of Next Door Neighbors, LLC. NDNI is the direct parent of the Company, which in turn, is a wholly-owned subsidiary of Next Door Neighbors, LLC.

SUMMARY OF RECOMMENDATIONS

No recommendations for the Company were identified that warranted inclusion in this Report on Examination.

CONCLUSION

The assistance and cooperation by the officers of the Company during this examination is hereby acknowledged and appreciated. In addition to the undersigned, Ryne Davison, CFE, Exam Manager with Lewis & Ellis, LLC, representing the Department; Walter Harry, PIR, CISA, AES, with TDI performed the information technology portion of the examination of the entire Group; Sean Fulton, ASA, MAAA, with TDI performed an actuarial review of the Group's reserving methodologies and assumptions; and Andrew Larocque, ASA, MAAA, with Risk & Regulatory Consultants, Inc, representing the Illinois Department of Insurance performed an actuarial review of the Group's rate adequacy.

Respectfully submitted,



Omar Akel, CFE
Examiner-in-Charge
Lewis & Ellis, LLC,
representing the Kansas Department of
Insurance

SUPERVISION

The examination process has been monitored and supervised by the undersigned. The examination report and supporting workpapers have been reviewed and approved. Compliance with NAIC procedures and guidelines as contained in the Handbook has been confirmed except where practices, procedures and applicable regulations of the Department and statutes of the State of Kansas prevailed.

A handwritten signature in black ink, reading "Levi Nwasoria", written over a horizontal line.

Levi Nwasoria, CPA, CFE
Chief Examiner
Kansas Department of Insurance

EXHIBIT S
EXAMINER'S AFFIDAVIT AS TO STANDARDS AND
PROCEDURES USED IN AN EXAMINATION

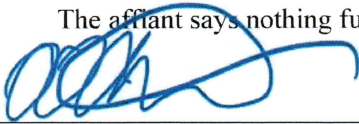
State of NEBRASKA,

County of GARDEN,

OMAR AKEL, being duly sworn, states as follows:

1. I have authority to represent the Kansas Insurance Department in the examination of Sunflower State Health Plan, Inc.
2. The Kansas Insurance Department is accredited under the National Association of Insurance Commissioners Financial Regulation Standards and Accreditation.
3. I have reviewed the examination work papers and examination report, and the examination of Sunflower State Health Plan, Inc. was performed in a manner consistent with the standards and procedures required by K.S.A 40-222.

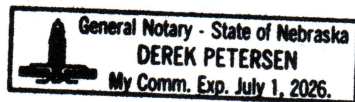
The affiant says nothing further.



Examiner's Signature

Subscribed and sworn before me by OMAR AKEL on this 24th day of JUNE, 2024.

(SEAL)



Notary Public

My commission expires July 1, 2026 [date].