Total Before And After Application of § 2695.12 Factors

Generic Total -- Before § 2695.12 Adjustments	**$1,273.60 m**	
Cignarale Total -- After § 2695.12 Adjustments	**$1,290.15 m**	(Testimony, 173:11)
§ 2695.12 Adjustment Difference	**$16.55 m**	**= 1.3% of Cignarale Total**

Before Application

Allegation Description	Alleged Violations	Willful?	"Generic" %	Generic Avg	Before § 2695.12 Adjustments
COCC Maintenance Failures (Denials)	1,799	--			
Money owed to claimant	689	W	65%	$6,500	$4.48 m
No Money owed to claimant	1,110	W	50%	$5,000	$5.55 m
TOTAL					**$10.03 m**
Incorrect Pre-Ex Period Denials	5,314	--			
Applies 12 Mos. Pre-Ex	3,645	NW	65%	$3,250	$11.85 m
No money owed to claimant	843	NW	50%	$2,500	$2.11 m
Incorrectly Applied 6 Mos. Period	826	W	65%	$6,500	$5.37 m
TOTAL					**$19.33 m**
EOPs - Right To Review Lang.	462,805	W	30%	$654.09	**$302.72 m**
EOBs - IMR Lang.	336,267	W	35%	$1,032.89	**$347.33 m**
UCSF - Inaccurate Payments	3,124				
Willful	1,142	W	50%	$5,000	$5.71 m
Non-Willful	1,982	NW	50%	$2,500	$4.96 m
TOTAL					**$10.67 m**
UCLA - Inaccurate Payments	1,333				
Willful	572	W	50%	$5,000	$2.86 m
Non-Willful	761	NW	50%	$2,500	$1.90 m
TOTAL					**$4.76 m**
UCLA - Failure to Respond	2,405	NW	50%	$2,500	**$6.01 m**
Reworks - Inaccurate Payment	78,320	W	50%	$4,096.02	**$320.80 m**
Late Pays	34,997	W	50%	$5,000	**$174.99 m**
Interest Payment Failures	5,195	W	20%	$2,000	**$10.39 m**
Ack Letter Failures	56,463	NW	20%	$942.77	**$53.23 m**
Untimely PDR Responses	1,510	W	40%	$4,000	**$6.04 m**
Denying/Closing with Info Requests	52	NW	50%	$2,500	**$0.13 m**
Overpayments - Untimely Notices	1,934	W	30%	$3,000	**$5.80 m**
Overpayments - Record Retention	2,605	NW	10%	$500	**$1.30 m**
Untimely Response to CDI (21d)	30	NW	10%	$500	**$0.02 m**
Training Failures	23	NW	60%	$3,000	**$0.07 m**
TOTAL	**994,176**				**$1,273.60 m**

After Application

Allegation Description	Alleged Violations	Will-ful?	"Generic" %	Generic Avg Penalty	Cignarale Avg Penalty	After § 2695.12 Adjustments
COCC Maintenance Failures (Denials)	1,799	--				
Money owed to claimant	689	W	65%	$6,500		
No Money owed to claimant	1,110	W	50%	$5,000		
TOTAL					**$6,132**	**$11.03 m**
Incorrect Pre-Ex Period Denials	5,314	--				
Applies 12 Mos. Pre-Ex	3,645	NW	65%	$3,250		
No money owed to claimant	843	NW	50%	$2,500		
Incorrectly Applied 6 Mos. Period	826	W	65%	$6,500		
TOTAL					**$2,222**	**$11.81 m**
EOPs - Right To Review Lang.	462,805	W	30%	$654.09	**$720**	**$332.99 m**
EOBs - IMR Lang.	336,267	W	35%	$1,032.89	**$671**	**$225.76 m**
UCSF - Inaccurate Payments	3,124					
Willful	1,142	W	50%	$5,000		
Non-Willful	1,982	NW	50%	$2,500		
TOTAL					**$4,097**	**$12.80 m**
UCLA - Inaccurate Payments	1,333					
Willful	572	W	50%	$5,000		
Non-Willful	761	NW	50%	$2,500		
TOTAL					**$4,109**	**$5.48 m**
UCLA - Failure to Respond	2,405	NW	50%	$2,500	**$3,000**	**$7.22 m**
Reworks - Inaccurate Payment	78,320	W	50%	$4,096.02	**$4,915**	**$384.96 m**
Late Pays	34,997	W	50%	$5,000	**$5,500**	**$192.48 m**
Interest Payment Failures	5,195	W	20%	$2,000	**$1,700**	**$8.83 m**
Ack Letter Failures	56,463	NW	20%	$942.77	**$1,414**	**$79.85 m**
Untimely PDR Responses	1,510	W	40%	$4,000	**$4,400**	**$6.64 m**
Denying/Closing with Info Requests	52	NW	50%	$2,500	**$2,625**	**$0.14 m**
Overpayments - Untimely Notices	1,934	W	30%	$3,000	**$4,200**	**$8.12 m**
Overpayments - Record Retention	2,605	NW	10%	$500	**$750**	**$1.95 m**
Untimely Response to CDI (21d)	30	NW	10%	$500	**$450**	**$0.01 m**
Training Failures	23	NW	60%	$3,000	**$3,300**	**$0.08 m**
TOTAL	**994,176**					**$1,290.15 m**