

# Attachment B

August 19, 2022

To: Chantay Reid, Vice President, Human Resources

From: Robert Snoddy, Internal Audit Manager

Re: Formal Complaint for Retaliation, Punitive, and Attacking Behavior

Ms. Reid,

Accept this letter as Formal Complaint for Retaliation, Punitive, and Attacking Behavior that has created a hostile atmosphere in my working environment at CareOregon. This harassment and hostile environment has been ongoing since 2016 and has negatively impacted my mental and physical state along with my professional career advancement and income.

I lodge the following complaint of retaliation, punitive, and attacking behavior against CareOregon and in particular against Chris Zorn, Vice President Audit and Compliance. Specifically:

- A) CareOregon has, at the direction of multiple senior management personnel, created a workplace environment in which Internal Audit is repeatedly treated in a hostile fashion, particularly immediately after my team and I identify CareOregon's noncompliance with various legal mandates; and
- B) Personnel in the Internal Audit department have been denied access to advancement of their careers within the organization and affiliated entities; and
- C) My Formal Complaint of July 7, 2021 to the Chief Equity, Diversity, and Inclusion Officer has been ignored; to this day, I have no response to this complaint; and
- D) On August 11, 2022 I was written up by Mr. Zorn for a series of non-specific "offenses" against SPIRITED Values, generally for expressing both my own opinion on matters *after having been invited to do so*, and again for pointing out actual shortcomings and potential legal noncompliance, incorrectly identified as "job performance."

As a result of these issues as evidenced in the Appendix, I have been harmed economically (*in the result of denial of advancement to my career*) and non-economically (*in the unfair and inequitable manner in which I have been treated*). This harassment and hostile environment has been ongoing since 2016, and Mr. Zorn's written performance evaluation presented to me on August 11, 2022 makes evident that matters are accelerating and have now reached a point of intolerability.

As an employee of CareOregon, I expect to be treated fairly and equitable at work. This not only means that I have a basic expectation of being treated with dignity and respect, but I also operate with the belief that I will be afforded opportunities for promotions, pay raises and other opportunities based on my job performance and fulfillment of job duties. Additionally, I expect to be able to work in an

environment that fosters mutual respect and is free of harassment and does not include a hostile setting. As noted in the CareOregon Human Resources Manual (*Harassment and Discrimination and Investigation of Complaints, Policy #104*), harassment creates an unacceptable working environment and will not be tolerated.

As directed in the Human Resources Manual, I am reporting this incident of harassment, including Retaliation, Punitive, and Attacking Behavior to the Vice President of Human Resources. I request action and a proper investigation of this Formal Complaint for Retaliation, Punitive, and Attacking Behavior and a written formal and timely response. Please investigate and respond to this Formal Complaint for Retaliation, Punitive, and Attacking Behavior.

## **BACKGROUND**

My career development goals were to be part of an organization that values and rewards performance and allows for upward mobility. As such, it has been my desire to either be promoted to a higher position within CareOregon's Internal Audit department or obtain a leadership position elsewhere within the organization. As it was never my career goal to remain at the Manager level, my professional development included earning a Master's in Business Administration (MBA) degree and I am a Certified Internal Auditor (CIA), have Certification in Healthcare Compliance (CHC) and Certification in Healthcare Privacy Compliance (CHPC). Moreover, my professional development goal noted in CareU for the past five (5) years has been to obtain the position of Internal Audit Director or Director elsewhere in the organization; however, this has not occurred, nor have I received any support from Human Resources or management in support of my professional development and advancement. As such, my career growth has been stagnant, and my income has been substantially impacted by hundreds of thousands of dollars.

Performing and overseeing the audit and compliance functions for CareOregon, CareOregon Advantage, Health Share of Oregon Coordinated Care Organization (CCO), Jackson Care Connect CCO, Columbia Pacific CCO, CareOregon Dental, and HouseCall Providers for over fifteen (15) years and conducting hundreds of internal audits of operations has allowed me the opportunity to gain a thorough understanding of internal operations and Oregon Health Authority (OHA) and Centers for Medicare & Medicaid Services (CMS) compliance requirements.

As a Certified Internal Auditor (CIA) and Internal Audit Manager employed with an organization that disseminates federal and state funds to health care providers and other entities, I have professional audit standards and ethics in which I abide. These include ensuring compliance with federal and state regulatory requirements as they relate to Medicare and Medicaid and ensuring that the organization is a good steward of federal and state funds.

Over the past seven (7) years, I have been told numerous times that good news is forthcoming regarding a promotion to the position of Internal Audit Director; however, there has been no action to make this a reality. Moreover, on July 9, 2020, Steve Hoffman (former Audit and Compliance Officer) was

informed by Eric Hunter, Chief Executive Officer, that he will soon have responsibility changes and that Mr. Hunter is 'Happy about where things are going – we have the right people in place in the Internal Audit and Compliance department'. In my September 29, 2020 One-on-One meeting with Steve Hoffman, Steve mentioned that Mr. Hunter made the comment that good things are coming in 1<sup>st</sup> Quarter 2021 for Alicia Ruckwardt (former Compliance Manager) and myself. This was prompted by Steve Hoffman asking Eric Hunter if it was alright to inform Alicia and me about the Director positions, to which Mr. Hunter replied, 'Yes'. However, there was no action to make this a reality. (**Note:** I have every reason to believe every statement told to me by Steve Hoffman).

CareOregon currently has 47 Director positions; I feel as though I am being penalized for performing the internal audit function and identifying areas of waste and non-compliance within the organization as an Internal Audit Director position has not been created. Not having a Director position in the Internal Audit department does not seem appropriate or logical for an industry where compliance with federal and state regulations is a high priority.

My desire to advance within CareOregon is evidenced by the forty-two (42) positions I have applied for since 2016 within other operational areas of CareOregon and affiliated entities. Of these positions I applied for, I have received only two (2) interviews. This does not comply with CareOregon's Human Resources Manual which states 'Generally, an internal applicant should be granted the courtesy of an interview provided they meets (sic) the minimum requirements'.

#### **Job Changes**

CareOregon is committed to providing opportunities for its employees to grow and develop professionally. The ability to apply for a position change is one of the primary ways CareOregon affirms this commitment.

- Vacant positions are generally posted on CareOregon's job site for both internal and external applications.
- To be considered for a specific opportunity, an internal applicant must apply online to the opening during the posting period.
- Generally, an internal applicant should be granted the courtesy of an interview provided they meets the minimum requirements. The internal applicant participates in the same interview process as external applicants. Although CareOregon encourages employees to apply for job changes, the Company always retains the discretion to select the most qualified applicant for the position.



**Reference:** CareOregon Human Resources Manual; Benefits, Compensation, and Job Classifications; Policy No. 201; Revised 02-01-2021.

Since June 2021 when Mr. Zorn was hired as the Vice President of the Audit and Compliance department, the Internal Audit Team has experienced inappropriate comments/responses, retaliatory behavior, expansion without inclusion, and punitive actions for performing the internal audit function we were hired to perform for CareOregon, CareOregon Advantage, Columbia Pacific CCO, Jackson Care Connect CCO, Metro (Health Share of Oregon), CareOregon Dental, and HouseCall Providers.

Mr. Zorn's leadership skills are lacking and his arrogant<sup>1</sup> management style leads to poor employee retention and demotivates the remaining employees, causing us to possibly be less productive than we otherwise would be. Moreover, in the one (1) year that Mr. Zorn has been at CareOregon, four (4) highly experienced personnel within the seven (7) person department including Steve Hoffman (Audit and Compliance Officer); Alicia Ruckwardt (Compliance Manager); Yuliya Edwards (Senior Internal Auditor); and Brad Lucas (Regulatory Manager) have left the organization due to unfulfilled promises of promotions and lack of support by senior management of the audit and compliance function.

As evidenced in the Appendix, Mr. Zorn does not have any regard for our opinions, even if those opinions are coming from personnel with over fifteen (15) years of experience in health insurance internal audit experience. He interferes in the running of internal audits to the point where he is stepping into the role of the auditor-in-charge. Moreover, he does not consider anyone else's professional judgement if it leads to an opinion that differs from his. This one person has negatively changed my perception of everything that I enjoyed and appreciated in my Internal Audit position and working at CareOregon.

There is a pattern of hypocrisy where CareOregon's actions conflict with its stated values around diversity, equity and inclusion<sup>2</sup> and being good stewards of taxpayer money. These actions do not reflect the 'SPIRITED' Values which the organization tries to abide by. Moreover, the situations described in this Formal Complaint would not be tolerated in a commercial or for-profit health insurance plan and personnel would be held accountable as shareholder wealth would be compromised. As a non-profit organization funded by government funds, CareOregon and affiliated entities should be held to an even higher standard of financial stewardship than commercial health insurance plans. This does not appear to be the strategy at CareOregon as I continue to see an organization that does not hold senior management accountable for performing the roles they were hired.

## **CONCLUSION AND NEXT STEPS**

For the past six (6) years, I have been subjected to a toxic work environment. It is my hope that this complaint and resulting investigation will be used in a constructive fashion to catalyze institutional and management changes that will benefit CareOregon both immediately and in the long run. I am happy to accept and learn from coaching and encouragement regarding my own actions, and it is my great hope to help lead CareOregon to a place where it functions in a more inclusive, collaborative, and legally compliant manner. I am saddened to have to submit this complaint that, ultimately, management above me does not appear to share this attitude and instead chooses to "shoot the messenger" when problems are identified and addressed.

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<sup>1</sup> An attitude of superiority manifested in an overbearing manner or in presumptuous claims or assumptions. The more deluded people are about their own skills and talents, the easier it is for them to fool others into thinking they are more capable than they actually are.

<sup>2</sup> 2022 Strategic Plan

However, although I prefer to hope that this complaint will be treated seriously as a catalyst for positive change, you should be aware that I also make this complaint to exhaust my internal remedies for the matters addressed herein. Therefore, if this complaint is treated by CareOregon the same way my previous Formal Complaint submitted July 7, 2021 was handled, I will seek additional assistance from the Bureau of Labor and Industries on or before November 9, 2022. I very much hope that does not become necessary.

The items listed in the Appendix below evidence examples of:

- A) Systemic hostility to Internal Audit;
- B) Systemic denial of career advancement for Internal Audit personnel;
- C) CareOregon's failure to respond to my July 7, 2021 Formal Complaint; and
- D) Recent disciplinary action against me for performing my core job functions of identifying performance shortcomings and legal noncompliance.

The Appendix also includes examples where CareOregon personnel would reach out to me for advice on Fraud, Waste and Abuse and ask for my input on compliance related inquiries due to my knowledge of these areas.

CONFIDENTIAL

**ISSUE A: SYSTEMIC HOSTILITY TO INTERNAL AUDIT**

1. Mr. Zorn stated in an Audit Huddle held on September 28, 2021 to Stacey Ross (Internal Auditor) and me, 'We'll have Yuliya for a week Robert, so you can think about how you can really exploit her for the week'.

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2. Mr. Zorn stated that a question I asked him was 'Ballsy'. These statements relate to a Microsoft Teams message where Mr. Zorn requested that one of my team members schedule a Microsoft Teams meeting for him and her. My team member did not schedule the meeting that same day and Mr. Zorn requested that I reach out to my team member to get her to be more *'receptive'*. I asked Mr. Zorn why he couldn't schedule the meeting and why would he send a message to my team member to schedule the meeting when he could have scheduled the meeting? Mr. Zorn's response was *'I'M TOO BUSY'*. He then stated that it was a 'Ballsy' question for me to ask. **This response greatly affected my mindset and mental stability as I identify as he/him/she/her/them/they pronouns.** **As such, I have had to take Family Medical Leave (FMLA) multiple times to deal with my work-related stress and anxiety from his comment.**

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3. Mr. Zorn does not ask the opinion of personnel in the Internal Audit department. Changes to audit reports and other departmental processes are made by him without any input from the Internal Audit team. Audit reports have been released by Mr. Zorn in MS Word format (rather than .pdf), with the 'Draft' watermark still on the documents and have been released without including myself – the Manager who oversees the Internal Audit function within the organization. Additionally, the prior audit reports contained much more detailed information than the report format created by him which is of lesser quality. He also twists statements around. During our Audit Huddle on September 28, 2021 one of my team members inquired why we did not discuss the changes to the audit reports and other processes as a Team. Mr. Zorn stated, *'The way audit reports are communicated and framed is why these things don't get fixed'*. He stated that changing the way the reports are written will hold people accountable. Mr. Zorn then made the comment to my team member in an arrogant manner, *'My apologies if I didn't review these changes with you'*. He then made the statement, *'Do I have to get your approval on everything?'* My team member responded to Mr. Zorn, *'Talk with us, it feels like we've been cut off'*. He replied, *'You're bummed out because of what?'* to which the team member responded, *'We worked together well as a team. The audit reports were changed without any involvement from us. I get that. We are all open to process improvement. The audit report was changed without asking us for our input. We didn't come together as a team. Seems like you should have involved us in the process.....this is the way I'd like it to be.'* Mr. Zorn responded, *'So [REDACTED] (employee name redacted to prevent retaliation), you want me to run through you*

*department changes and get your approval? Is that what you're saying?' My team member replied, 'No, I don't think you need our approval. I just wish you would involve us.....just ask us for our opinions. Involve us to some degree in what your thought process is. But it doesn't seem like that is your management style. Maybe that's OK.....maybe that's something we need to get used to.....but that's something we are not used to. I'm not talking down to you, I'm just talking to you.'* Mr. Zorn replied, 'No [REDACTED] (employee name redacted to prevent retaliation), you are....so you can't say things like that and then say no offense meant.....and then assault somebody.' In terms of the internal audit report format changes, Mr. Zorn sarcastically stated, 'My apologies if I didn't review these changes with you and tell you why.'

My Internal Audit Team understands that Mr. Zorn has the right to not ask our opinions; however, best business practices include the input of the personnel performing the internal audit function and who have extensive knowledge in federally funded health insurance plan operations. (**Note:** Mr. Zorn never answered my team member's question of why Internal Audit personnel were not involved in discussions around revising internal audit reports or the format in which they are prepared).

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4. Since June 2016, the overall view of internal audit functions has noticeably deteriorated. The Internal Audit function and my staff feel as though we are under attack and being intentionally discredited. Senior management is not closing out internal audit findings in a timely manner. This is evidenced by senior management's resistance to accept internal audit findings and develop adequate corrective action plans to mitigate the findings.

For example, as of July 2020, the Internal Audit and Compliance departments have been under the responsibility of Eric Hunter, Chief Executive Officer; however, there have been no communications (team meetings, huddles, etc.) between him and our department. The appearance to Internal Audit department personnel is that Mr. Hunter has a general dislike for the internal audit function as there is a complete lack of support of the Internal Audit Team and in holding operational personnel accountable to correct areas of non-compliance or operational deficiencies identified during internal audits<sup>3</sup>. Moreover, it feels like the Internal Audit department was reorganized to remove or silence staff regarding long-term significant regulatory deficiencies outlined and identified in CareOregon's Corrective Action Plan Log<sup>4</sup>. As evidenced by audit results summarized below, I suspect that this targeting is due to performing audits such as the (A) Value-Based Payment Process, (B) Non-Emergent Medical Transportation (NEMT), and (C) Timely Removal of System and Facility Access

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<sup>3</sup> September 9, 2019 response when the VBP Audit was put on 'Hold' by the Chief Legal Officer and Chief Medical Officer

<sup>4</sup> 2022 CareOregon Corrective Action Plan Log

for Terminated Employees where multiple audit findings were identified, and it was identified that senior operational management may not fully understand the regulations and operations for the operation they were overseeing.

(A) Value-Based Payment Audit (VBP)<sup>5</sup>- Internal Audit identified severe internal control weaknesses regarding the calculation of metrics, oversight, and monitoring of the VBP process. Our testing noted multiple payment errors to providers and missing metrics to validate providers' attainment of Program Targets. Payment errors were identified in nine (9) of fifteen (15) sample incentive payments reviewed for an error rate of 60%.

**(Note: There were 200 providers participating in the VBP program in 2019 and with a 60% error rate, there is potential for up to 120 providers being paid incorrectly.**

Our testing of the fifteen (15) providers in our sample noted the following:

- Providers were overpaid in seven (7) of fifteen (15) instances resulting in annualized overpayments of \$1,470,000.
- In two (2) instances, providers were underpaid.

Internal Audit recommended the Director of Delivery Systems Improvement (or delegate) review and reanalyze the metrics to ensure completeness, attainment of program targets, and correct payment levels for the period January 1, 2017 to current for all providers who participated in the VBP program. We also recommended that any overpayments be recouped and providers who were underpaid to be made whole.

This audit was released and disseminated to senior management on May 26, 2020, presented to the Board of Directors Audit and Compliance Committee on June 9, 2020, and the Internal Compliance Committee on July 17, 2020. As of July 2022, Internal Audit is unaware if there have been any actions to recoup these overpayments or validate that the payments made were correct.

Additionally, on four (4) separate occasions,<sup>6</sup> Mr. Zorn has made statements such as, *'Senior management and the Board of Directors have a feeling that the VBP operation is still a bit of a mess and they are not comfortable'*. I responded that this was an ironic statement since during the audit and subsequent release of the Value-Based Payment Audit Report, senior management stated that my Internal Audit team *'did not understand the VBP program requirements and metrics and that we got it 'completely wrong', and it was considered a 'Gotcha''*. Based on these statements made by Mr. Zorn, it appears that senior management and the Board of Directors opinion of VBP calculation of metrics, accuracy of payments, oversight, and monitoring of the process has changed since

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<sup>5</sup> Value-Based Payment Audit, released March 26, 2020

<sup>6</sup> September 10, 2021; January 26, 2022; June 17, 2022; May 6, 2022



the release of the audit in May 2020. This is the complete opposite opinion of when the report was initially released and senior management was adamant that the VBP operation was functioning correct and providers were being paid accurately per attainment of performance metrics.

- (B) Non-Emergency Medical Transport Audit (NEMT)<sup>7</sup> –Internal Audit identified that there is insufficient development and oversight of the NEMT operation by CareOregon’s Transportation and Strategic Partnership department and consider these Findings as significant as member safety may be compromised. In our review and testing, Internal Audit identified the following deficiencies:
1. NEMT drivers used to transport CPC, JCC, and HSO members may not have a valid driver license or completion of a criminal background check
  2. NEMT vehicles used to transport CPC, JCC, and HSO members may not meet OHA safety and maintenance requirements. NEMT vehicles which do not meet these requirements compromise the safety and comfort of members;
  3. There is no evidence to support that Ride Connection NEMT drivers have been trained on their job duties and responsibilities.

These Findings could have been easily addressed and mitigated by CareOregon’s Transportation and Strategic Partnerships Director (or delegate) by conducting an onsite review or other testing to validate that:

- 1) A copy of the NEMT driver license is on file and criminal background check has been conducted;
- 2) NEMT vehicles meet OHA safety and maintenance requirements (and include the additional items that CareOregon requires the NEMT vendor to comply with such as seat belt extender, bloodborne pathogens spill kit, seat belt cutter, and other items).
- 3) NEMT drivers have been trained on their job duties and responsibilities.

However, instead of addressing the Findings, the Vice President of Strategic Partnerships was argumentative and made the statement to me at the November 2, 2020, Audit Exit Meeting, *‘I’m already finding that the meeting is unraveling and not to go further’* and *‘I’m not able to have a constructive conversation with you’*. The statement made by the Vice President of Strategic Partnerships was totally inappropriate and disrespectful to myself and my Team.

Although CareOregon has delegated the operation of the NEMT benefit to five (5) external vendors, as of April 19, 2022 the Transportation and Strategic Partnership department which oversees the benefit consists of one (1) Director, one (1) manager, one (1) supervisor and fifteen (15) staff. Total payments made to NEMT vendors to perform the benefit in 2020 were in excess of \$50 million dollars.

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<sup>7</sup> Audit of Non-Emergency Medical Transportation (NEMT) Operation, released March 31, 2021

(C) Timely Removal of System and Facility Access for Terminated Employees. In 2019, Internal Audit released reports for three (3) Monitoring Reviews<sup>8</sup> and two Internal Audits<sup>9</sup> related to the timely removal of system and facility access for terminated employees' process. The Findings identified in the Monitoring Reviews and Internal Audits were communicated to senior management of the Human Resources, Information Systems, and Safety and Facility departments, and the Findings stressed the importance of addressing them without delay.

Based on the results of these reviews and testing, Internal Audit concluded that the actions taken by senior management from 2019 through 2021 have been inadequate and ineffective in controlling risks. Since these Findings have not been appropriately addressed, unauthorized access to CareOregon systems and equipment could lead to malicious activities such as theft of data (*to include member information and PHI*), attacks on information systems which can be especially harmful, and preventable crimes against employees while in CareOregon facilities.

The most recent audit results from the November 4, 2021 audit noted:

1. Five (5) terminated employees did not have system access revoked timely (*a 25% exception rate*). Delays ranged from one (1) day to fifty-two (52) days to revoke access.
2. Thirteen (13) employees did not have facilities and buildings access removed timely (*a 65% exception rate*). Delays ranged from one (1) day to thirty-one (31) days.

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5. Based on internal audit testing, results, and discussion with operational personnel in senior management roles, some of these personnel appear to be unqualified for the senior level position and operations they manage. Internal Audit personnel receive pushback and argument from operational management for most every audit initiated and Finding identified. Instead of addressing Findings identified in audits, senior management uses distractions and personal attacks<sup>10</sup> against my Team and me instead of fixing the area of non-compliance. Additionally, senior management is often non-responsive when Internal Audit personnel attempt to communicate with them when conducting audits or other projects. Not listening to or following up on Internal Audits Findings or waste/misuse of funds is not considered a 'Best Practice'.

<sup>8</sup> July 23, 2019; October 24, 2019; and November 27, 2019

<sup>9</sup> February 2021; November 4, 2021

<sup>10</sup> Value Based Payment Exit Conference Notes; NEMT Discussion, November 2, 2020

The Value-Based Payment Audit, Non-Emergent Medical Transport (NEMT) Audit, and other audits are examples where senior management argued over the Findings but provided no support or evidence to dispute or refute these Findings. Instead, senior management makes comments that Internal Audit does not understand the requirements for each of these operations and said the *'Tone of the auditors'* during Exit Conferences *'was not respectful'*. As such, the appearance to my team and other employees in the organization is that senior management is part of the problem instead of being part of the solution. Moreover, distractions such as these and arguing with the internal auditors because we identified errors in the VBP and NEMT operations to me indicates that the senior management overseeing these operations may not fully understand the requirements and regulations for the operations they manage. This statement is evidenced by the following examples:

- A. Value-Based Payment Audit - The results and Findings of this audit were presented to VBP personnel during a second preliminary Exit Conference on September 6, 2019. During this meeting, the Vice President of VBP threw her arms up in the air and said *'Let's move on and I don't really care how it gets worded in the final report'* and the Director of the Value-Based Payment operation was disagreeing with all of our Findings. Instead of the Vice-President and Director being receptive to what the Internal Audit Team was telling them about weaknesses in the VBP operation, they made statements that we did not look at the data correctly and did not interpret the data accurately.<sup>11</sup> These actions to me reflect that the Vice-President and Director were not qualified to manage the operations they oversaw nor did they have any desire to remedy the Findings.

This same afternoon, we were instructed by the Chief Legal Officer and Chief Medical Officer to 'Stop' the audit as VBP personnel felt they were being 'interrogated' and were in 'tears'.<sup>12</sup> In no way was this the intent of any of us in the Internal Audit department. Internal Audit acts in an independent role to provide assurance that CareOregon's risk management, governance, and internal control process are operating effectively. For my Team to perform these functions, we ask questions to understand processes and calculations of metrics in the VBP operation. Was it ever considered that the VBP personnel were reacting this way due to a lack of knowledge of the operation not knowing answers to questions being asked? Moreover, it is important to note that on multiple occasions, Internal Audit tried to work proactively with VBP personnel during this audit; however, there had been pushback from the initial time we notified VBP management that we were going to perform the audit. The stoppage of this audit was presented to members of CareOregon's Internal Audit and Compliance subcommittee of the Board of Directors, and we were instructed to continue on with the VBP audit.

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<sup>11</sup> Exit Conference Meeting 090619

<sup>12</sup> VBP Timeline.docx

Mr. Zorn stated that *'the message can get confused by who and how presented'*. This statement by Mr. Zorn is not correct. The most professional individual I have met in my career, Yuliya Edwards (Senior Internal Auditor) presented during the two (2) VBP Exit Conferences held on September 6, 2019 and February 28, 2020 and the message did not get confused. During this meeting, Yuliya again stressed that Internal Audit's purpose was to give constructive feedback to improve the VBP process and that we had no intention of criticizing at all. She also went on to reiterate that *'It is Internal Audits function to team with and collaborate with the VBP Team to improve the process. Audit is here to make recommendation and in no way are we here to criticize. It is best if we work together to make improvements through an internal process'*. Yuliya stressed the importance of using Internal Audit as a resource and the importance of ensuring financial stewardship of taxpayer funds.<sup>13</sup>

Most recently, the email below from May 11, 2022 supports lack of knowledge and understanding of the VBP process as the Pricewaterhouse Coopers audit of the VBP operation was assigned to a newly hired Director who has been with CareOregon for two (2) days.

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**From:** Angela Mitchell <[mitchella@careoregon.org](mailto:mitchella@careoregon.org)>  
**Sent:** Wednesday, May 11, 2022 11:31 AM  
**To:** Nathan Mueller (US) <[nathan.mueller@pwc.com](mailto:nathan.mueller@pwc.com)>; Teresa Learn <[learnt@careoregon.org](mailto:learnt@careoregon.org)>  
**Cc:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>; Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>; David Merriam (US) <[david.r.merriam@pwc.com](mailto:david.r.merriam@pwc.com)>; Christopher Thompson (US) <[christopher.j.thompson@pwc.com](mailto:christopher.j.thompson@pwc.com)>; Alex Pieper (US) <[alex.pieper@pwc.com](mailto:alex.pieper@pwc.com)>  
**Subject:** RE: PwC | Alternative Payment Methods & Provider Payments and Incentives: Next Steps

Hello Nathan,

I need to request an extension to EOB next Friday 5/20 for his request. I have a new director for VBP who just started two days ago who will be the PoC for this audit and I need to be able to give her time to work with her team to collect this information. Please let me know if this will work.

I appreciate your understanding.

Thank you,  
Angela

**Angela Mitchell** | VP, Value Based Payment/Provider Contracting | 541-543-8617 | [careoregon.org](http://careoregon.org)



B. Oregon Health Science University Financial Fraud<sup>14</sup> – This Electronic Funds Transfer fraud resulted in two (2) separate unauthorized electronic fund transfers totaling \$1,592,943.45 (\$1,247,402.14 – Medicaid and \$345,541.31 – Medicare) that was sent to an

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<sup>13</sup> 7. Exit Conference Meeting 022820

<sup>14</sup> Root Cause Analysis/OHSU Hospital, July 30, 2021

unknown party (OHSU Hospital.com) on July 20, 2021. Review and analysis of this fraud was assigned by Mr. Zorn to Yuliya Edwards, Senior Internal Auditor to perform an issue chronology, Root Cause Analysis, and identification of Remediation and Process fixes. Mr. Zorn stated to me that he felt like he does not have the appropriate person to perform the investigation. **(Note: Yuliya has an advanced degree, is a Certified Fraud Examiner, a Certified Information System Auditor, and is working on her Certified Internal Auditor designation. Yuliya is more than qualified to perform this review. Additionally, Yuliya and I were both recipients of Super ACE awards for exceptional performance in 2020 and 2018 respectively. These awards are reviewed and approved by senior management, including Mr. Hunter).** Yuliya identified that, 'Inadequate knowledge, expertise, oversight, and leadership by the Provider Relations Manager and Vice President of Network and Clinical Support resulted with improperly trained Provider Relations Specialists and contributed significantly to the failure in the Electronic Funds Transfer (EFT) process'. At the time of the fraud, the operation was managed by the Vice President of Value Based Payment, who also managed the VBP operation and incorrect payments described above. **(Note: For an unknown reason, senior management placed some blame on this fraud on Steve Hoffman, former Audit and Compliance Officer and Alicia Ruckwardt, former Compliance Manager, even though they had nothing to do with set-up or oversight of the EFT account change process).**

- C. Non-Emergency Medical Transport (NEMT) - During the Exit Conference for this audit held on November 2, 2020, the Vice President of Strategic Business Initiatives was extremely disrespectful and made derogatory comments about the way the audit was conducted. Instead of addressing the Findings, the Vice President of Strategic Partnerships was argumentative and made the statement, *'I'm already finding that the meeting is unraveling and not go further'* and *'I'm not able to have a constructive conversation with you'*.<sup>15</sup> Additionally, on January 27, 2021 at the Delegation Oversight department presented their review of the NEMT operation which the Internal Audit team also identified in our audit. A summary of this encounter is available and can be provided upon request.
- D. Timely Removal of System and Facility Access for Terminated Employees - Internal Audit released reports for three (3) monitoring reviews<sup>16</sup> and two Internal Audits<sup>17</sup> related to the timely removal of system and facility access for terminated employees process. The audit Findings identified were communicated to management of Human Resources, IS, and Safety and Facility departments, and stressed the importance of addressing the Findings without delay.

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<sup>15</sup> NEMT Discussion Meeting Notes, November 2, 2020

<sup>16</sup> Released July 23, 2019; October 24, 2019; and November 27, 2019

<sup>17</sup> Released February 2021, November 4, 2021.

Testing from our most recent audit of this process concluded that the actions taken by senior management from 2019 through 2021 have been inadequate and ineffective in controlling risks from terminated employees.

E. Personal Representative and Release of Information Audit – During our Exit Conference on October 5, 2021 with the Vice President of Customer Experience and four (4) employees, Internal Audit had to explain in detail the differences between the purpose and requirements for the Release of Information Form and Personal Representative (or Power of Attorney) Form. In her role as Vice President of the Customer Experience department and the operation she oversees, the difference in the purposes of these forms and the protected health information which can be released should have been known; however, this information had to be explained to them in detail by myself.

F. Behavioral Health Provider Network Adequacy and Online Provider Directory Accuracy Audit – An Exit Conference was held on June 8, 2021 with the Vice President of Behavioral Health, Vice President of Provider Network and Vice President Value-Based Pricing along with five (5) other operational personnel to discuss the Findings related to the audit. My team provided evidence that some of the provider contact information or required CMS/OHA online provider directory requirements were not correct, including screen prints where a behavioral health provider within the CareOregon Metro provider network was inappropriately being displayed on the Jackson Care Connect CCO online provider directory. During the Exit Conference, the Vice Presidents did not agree with our Findings that there were discrepancies in the accuracy of the online provider directory. To evidence our Findings, we forwarded our screen prints and descriptions of the Findings on to operational management for their review and rebuttal.

We met again on September 14, 2021 for another Exit Conference to review the screen prints and answer any questions that the Vice President of Behavioral Health, Vice President of Provider Network and Vice President Value-Based Pricing may have. This report was finally released on November 5, 2021. What I had difficulty understanding was why the Vice President of Behavioral Health did not take ownership of the online provider accuracy issues and address them; instead, she became part of the problem and not part of the solution.

G. Business Continuity and Disaster Recovery Audit – An Exit Conference was held on August 1, 2018 with the Vice President, IS (who also oversaw the Facilities operation), the Disaster Recovery/Business Continuity Manager, and two (2) members of the Safety Team to discuss the results of the audit. One Finding noted that CareOregon is not in compliance with Occupational Safety and Health and

Health Administration (OSHA) requirements to perform monthly visual inspections of portable fire extinguishers. Our testing noted that 25 of 25 portable fire extinguishers did not evidence any type of visual inspection that:

- The portable fire extinguisher is still present in its designated location;
- No damage has occurred to the equipment;
- No obstructions are blocking the equipment from view or from easy access; and
- The portable fire extinguisher is fully charged and operational.

The Vice President and the Disaster Recovery/Business Continuity Manager both stated that this was an OSHA requirement and that 'performing monthly visual inspections of portable fire extinguishers was not their responsibility'. My team and I were dumbfounded and could not believe the response. I asked the Disaster Recovery/Business Continuity Manager how this process is not his responsibility as it should be one of the cornerstones of the Business Continuity and Disaster Recovery Program. He again stated that this was an OSHA requirement and that performing monthly visual inspections of portable fire extinguishers was not their responsibility.

I then proceeded to have the Senior Internal Auditor perform an OSHA Compliance Audit (released March 5, 2019) resulting in five (5) Findings, including the same Finding that was identified in the Business Continuity and Disaster Recovery Audit noted above:

- 25 of 25 portable fire extinguishers did not evidence any type of visual inspection that:
  - The portable fire extinguisher is still present in its designated location;
  - No damage has occurred to the equipment;
  - No obstructions are blocking the equipment from view or from easy access;
  - The portable fire extinguisher is fully charged and operational, and
- Safety of employees was jeopardized due to expired emergency equipment supplies (automated external defibrillator pads), missing contents of first-aid kits and awareness of where these items are retained.

***(Note: Instead of being part of the solution, the Vice President and the Disaster Recovery/Business Continuity Manager become part of the problem. After this audit, on March 15, 2019, the Disaster Recovery/Business Continuity Manager was promoted to Senior Manager, Disaster Recovery/Business Continuity and on October 6, 2020 promoted to Director, Business Continuity, Safety and Facilities).***

- H. EthicsPoint Report, received anonymously on April 14, 2022 where an employee reported that *'Dr. Shah promoted an individual who is not qualified for the new vice president position'*.
- I. Corporate Compliance and Ethics Week was held on November 6 to 12, 2022 and the purpose is to shine a spotlight on the importance of compliance and ethics. The email from Mr. Zorn to all employees regarding Compliance Week was sent at the end of the week on Friday, November 12, 2022 at 3:43 PM.

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From: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Sent: Friday, November 12, 2021 3:43 PM  
Subject: National Compliance Week

Happy National Compliance Week Everybody!!

Your Compliance team is celebrating National Compliance Week this week and taking this as a good opportunity to remind everyone about your compliance programs.

Below is an overview of the important programs your compliance department manages, if you have any questions or would like additional information please don't hesitate to reach out to us with any questions.

- Ethics and Compliance is all about doing the right thing and standing up for what is right and fair. This is the basis for the CareOregon Code of Conduct and is CareOregon's formal commitment to high standards and rules regarding ethical business conduct. [Code of Conduct](#)
- Reporting Fraud, Waste and Abuse is everyone's responsibility, the mechanism for reporting FWA can be found in multiple documents throughout the company. We have included the link to the [FWA Handbook](#) for your reference.
- Protecting member privacy is everyone's responsibility. The self-reporting of potential HIPAA breaches by our employees has been a tremendous help and the key to our success for the past couple years. [HIPAA Policy and Procedure Guide.pdf](#)
- CareOregon has a strict non-retaliation policy. We depend on you to help us ensure that we are meeting standards for Fraud, Waste, Abuse, Compliance and member privacy. Reporting concerns as early as possible ensures that we are able to respond to best serve our members and stakeholders.

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7. Lack of transparency and communication from Mr. Zorn:

May 24, 2022: Email from Mr. Zorn stating that an Audit and Compliance Coordinator position has been filled. As the Audit Manager, the professional courtesy of interviewing this individual who would be working alongside me was never offered and would have been appreciated. Additionally, on March 14, 2022, I noticed that two other employees (Keith Hagan and Jessica Saucedo) within our department had been promoted to supervisors; however, this was never communicated to me or the Internal Audit Team.

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**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Tuesday, May 24, 2022 9:57 AM  
**To:** Amy Griffin <[griffina@careoregon.org](mailto:griffina@careoregon.org)>; Brad Lucas <[lucasb@careoregon.org](mailto:lucasb@careoregon.org)>; Brian Brush <[brushb@careoregon.org](mailto:brushb@careoregon.org)>; Chelsea Biondolillo <[biondolillo@careoregon.org](mailto:biondolillo@careoregon.org)>; Crystal Metras <[metrasc@careoregon.org](mailto:metrasc@careoregon.org)>; Gina Yaconetti <[yaconettig@careoregon.org](mailto:yaconettig@careoregon.org)>; Jessica Saucedo <[saucedaj@careoregon.org](mailto:saucedaj@careoregon.org)>; Keith Hagan <[hagank@careoregon.org](mailto:hagank@careoregon.org)>; Madeline Mertens <[mertensm@careoregon.org](mailto:mertensm@careoregon.org)>; Rene Polly <[pollyr@careoregon.org](mailto:pollyr@careoregon.org)>; Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>; Ronnie Lewis <[lewisr@careoregon.org](mailto:lewisr@careoregon.org)>; Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>; Tia Manns <[mannst@careoregon.org](mailto:mannst@careoregon.org)>  
**Subject:** Rene Polly

I have Great news! Rene Polly has accepted the position as our Audit and Compliance Coordinator, her transfer date is 6/6. Rene is from our Pharmacy Team and so happy she's joining us. Join me in welcoming her  
Chris

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8. Attacking Comments and Hostile Work Environment

A. August 6, 2021 - One-on-One meeting: In the five weeks that Mr. Zorn has known me and my Team, the following statements were made by him about the Internal Audit Team and myself without any verification and/or validation.

- The performance of our department is lacking;
- There seems to be an issue with our product;
- I have been highly critical of senior management;
- He is not a fan of our current audit reports and format, and that the audits seem imprecise;
- The audit department has created a high level of mistrust in the organization;
- I have interpersonal and communication issues;
- I am power hungry and insensitive;
- I am passive aggressive;
- That I am attempting to get Yuliya Edwards a promotion to Manager as a reason for me to be promoted to the Internal Audit Director position.

***(Note:** Mr. Zorn offered no suggestions on how to address or correct any of the deficiencies he stated).*

B. September 17, 2021 (0900) – One-on-One Meeting:

- Mr. Zorn stated to me that *'I have interpersonal issues and that I come across as a little abrupt, don't want to say harsh, but abrupt. Overly assertive'*.
- Mr. Zorn made the statement from his interviews with CareOregon management related to me, *'No one said, zero, that I was smart, I made good points, and that I was knowledgeable, no one said that. Technically and professionally, I need work there.'* **(Note:** *I guess personnel could respond to that if the question was related to my knowledge and abilities, but otherwise, why would this statement be made (other than to create a hostile work environment).*
- Mr. Zorn stated to me that *'he doesn't think I am ready for a Director position'*. No reasoning given as to why Mr. Zorn made this statement or what skills I'm lacking to be promoted to this position if a position were created.
- Mr. Zorn made the comment that, *'Steve Hoffman was a bad boss'*.

C. On January 18, 2022, Mr. Zorn purposely 'Denied' my Professional Career Growth Goal from 2020 in the CareU Career and Professional Development platform. **(Note:** *Mr. Zorn was hired into CareOregon in June of 2021 and was not employed by CareOregon when I entered my Professional Career Growth Goal into CareU in January 2020).*

**Professional Career Growth**  
Status : Denied Target Date : 12/31/2020

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**Description/Measures :**  
To achieve the position of Director within the organization. As an employee who has been with the organization for over 13 years and has been in the present job position for greater than seven years, this promotion would be well deserved.

**Start Date :** 5/1/2020

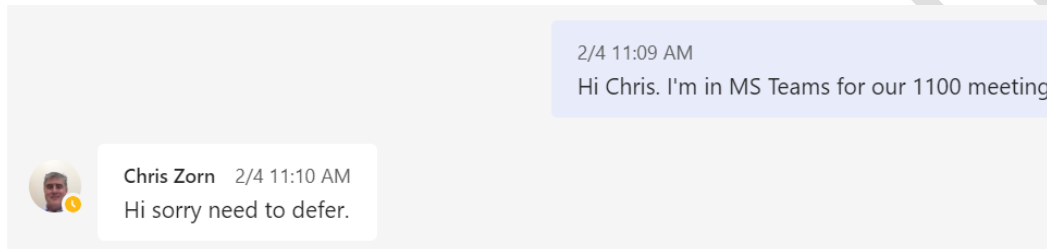
**Comments**

 **Christian Zorn** commented 1/18/2022 4:41 PM  
goal of advancement only due to time in current job is not appropriate

[Add Comment](#)

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9. Mr. Zorn doesn't show up for meetings he has scheduled, or he is continually late to meetings. He has no empathy or concern for my team members time as evidenced by the meetings scheduled, but in which he did not attend. The list below only reflects meetings scheduled by him in which he did not show and does not include the multiple meetings where he consistently logged into the meeting late (these can be provided upon request).
- A) October 15, 2021 – 1 PM One-on-One – No show.
  - B) Audit Huddles scheduled by Mr. Zorn – No Shows - October 19, 2021; December 7, 2021; December 14, 2021; December 28, 2021; January 11, 2022; January 25, 2022; February 8, 2022
  - C) Coaching Session initiated by Mr. Zorn - February 4, 2022 – 11 AM. No Show.



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10. I was assigned to create the CareOregon Internal Compliance Committee (ICC) in 2013 after the 2012 CMS Program Audit and educated senior management on the seven (7) elements of an effective compliance program. On November 18, 2021, Mr. Zorn shared the revised roster of the members of the ICC and Internal Audit representation was not included on the roster. During the meeting, I inquired why Internal Audit was not represented, as this is considered a best practice by CMS guidance.

*‘Sponsors should include members of senior management (e.g., CFO, COO), as well as auditors, pharmacists, registered nurses, and nationally certified pharmacy technicians on the compliance committee (to the extent that their organization has those positions on staff). Other committee members might include personnel experienced in legal issues, statistical analysts, and staff/managers from various departments within the organization who understand the vulnerabilities within their respective areas of expertise.’<sup>18</sup>*

On December 3, 2021 during a One-on-One, Mr. Zorn referenced the ICC meeting held on November 18, 2021 and disagreed that Internal Audit should be on the CareOregon ICC. He also stated that the way I asked the question ‘Why isn’t Internal Audit represented on the

<sup>18</sup> Medicare Managed Care Manual, Chapter 9 and 21, 50.2.2, 42 C.F.R. §§ 422.503(b)(4)(vi)(B)

*list of members of the ICC as recommended by CMS' was a bad question. People recognized it as bad'. They told him 'how could a guy call you out publicly'?*

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11. September 7, 2021 – Mr. Zorn presented to the Columbia Pacific CCO Executive and Compliance Committee and one slide had responses from senior management regarding the Internal Audit function and included statements such as:

- CareOregon personnel felt ‘disrespected’, threatened, and treated unprofessionally.
- That Internal Audits approach is a ‘Gotcha’, ‘we are right/you are wrong approach.
- There is a high degree of mistrust of the Internal Audit department
- Audit personnel communicate without precision, are dismissive, and unwilling to accept responsibilities.
- Internal Audit personnel have a low tolerance for listening.
- Personnel feel that Internal Audits opinions are dated, lack business acumen, and are not aligned with CareOregon.

Another slide shown during this meeting regarding Internal Audit showed ‘*Gaps in knowledge base of staff, transparency of the process, oversight, communication, and resource levels*’. As stated earlier in this Formal Complaint, these statements were made without Mr. Zorn reaching out to the Internal Audit Team for our side of the story and as such, these statements are wild speculations that are not founded in truth.

## Organizational Feedback & Assessment

- Review of Audit & Compliance Department product, process, and resources was completed along with extensive leadership interviews
- Gaps in knowledge base of staff, transparency of the process, oversight, communication, and resource levels
- Gaps currently being addressed with increased staffing for 2022 budget
  - Replacement of Audit Compliance Officer and Compliance Manager
  - Compliance and Internal Audit staff growing from 8 to 11
  - NEW Privacy, Security, and Fraud, Waste & Abuse staff of 3
  - Consolidating the existing Delegated Oversight team to Audit/Compliance in 2022

colpachhealth.org | page 2

**Reference:** *Presentation to Columbia Pacific CCO Board, September 7, 2021*

As none of these statements made by Mr. Zorn were true and reflected the current state, I stood up for the Internal Audit Team and myself and sent an email to Mimi Haley (Vice President – Columbia Pacific CCO) and Karen Knudson (CCO Governance and Grants Coordinator – Columbia Pacific CCO) regarding the presentation and these statements made to the CPCCO Executive and Compliance Committee Members.

From: Mimi Haley <[haley@mcareoregon.org](mailto:haley@mcareoregon.org)>  
Sent: Tuesday, September 7, 2021 9:50 AM  
To: Robert Snoddy <[snoddy@mcareoregon.org](mailto:snoddy@mcareoregon.org)>; Karen Knudson <[knudson@mcareoregon.org](mailto:knudson@mcareoregon.org)>  
Subject: RE: CPCCO Executive Meeting Comment, September 7, 2021

Robert – thank you for this perspective. Both Karen and I have deep faith and trust in you, your judgement and integrity. We hope you can weather the change in leadership at CareOregon, as you have always been our 'steady-eddy' firm hand on the tiller of the audit functions. We appreciate you. Take care, Mimi

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From: Robert Snoddy <[snoddy@mcareoregon.org](mailto:snoddy@mcareoregon.org)>  
Sent: Tuesday, September 7, 2021 9:33 AM  
To: Mimi Haley <[haley@mcareoregon.org](mailto:haley@mcareoregon.org)>; Karen Knudson <[knudson@mcareoregon.org](mailto:knudson@mcareoregon.org)>  
Subject: CPCCO Executive Meeting Comment, September 7, 2021

Hi Mimi and Karen,

I wanted to state this during the CPCCO meeting; however, I did not feel comfortable or safe to say this:

The objective of CareOregon's Internal Audit Team is to ensure operations are in compliance with CPCCO requirements and OHA contract regulations. I disagree with the statement related to gaps in skill set of Internal Audit staff, transparency of the process, oversight, and communication. The Internal Audit Team's views were never heard or considered to validate the legitimacy of these statements. My team is knowledgeable and can interpret Medicare and OHA/Medicaid regulations and contract requirements. Additionally, when conducting audits, our approach is to offer realistic recommendations to address any areas of non-compliance with OHA contract requirements.

**Robert Snoddy, CIA, CHC, CHPC**  
Manager, Audit

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12. My team and I would have appreciated a quick meeting from Mr. Hunter to inform us of the new Vice President of Audit and Compliance. Instead, we received an email from Mr. Hunter on June 9, 2021 introducing Mr. Zorn as the new Vice President of Audit and Compliance. (**Note:** Internal Audit personnel, including myself were not invited to participate in the interview process and this was our first 'notice' that we had a new Vice President in our department).

From: Eric Hunter <[huntere@careoregon.org](mailto:huntere@careoregon.org)>  
Sent: Wednesday, June 9, 2021 12:03 PM  
To: #Executive Leadership Team <[ExecutiveLeadershipTeam@careoregon.org](mailto:ExecutiveLeadershipTeam@careoregon.org)>  
Cc: Steve Hoffman <[hoffmans@careoregon.org](mailto:hoffmans@careoregon.org)>; Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>; Alicia Ruckwardt <[ruckwardta@careoregon.org](mailto:ruckwardta@careoregon.org)>  
Subject: New Vice President of Audit and Compliance

Hi all,

I am pleased to announce that Christian Zorn will be added to our great Audit and Compliance team as our new VP of Audit and Compliance effective June 14<sup>th</sup>. Chris brings extensive experience in healthcare, government programs, and regulatory oversight. He joins us from Centene where he served as Regional Medicare Compliance Officer for the western states. In this role he created the organization's 1<sup>st</sup> corporate compliance dashboards, redesigned Medicare DSNP Plan oversight, and redesigned the organization oversight of Medicare risk-based revenue. Prior to that, he served as Vice President at Prime Healthcare where he strengthened financial controls prior to an initial public offering. He has also held leadership positions in other organizations such as SCAN Health Plan, Transamerica and served in roles for the AHIP, National Healthcare Anti-Fraud Association, and the American Institute of CPAs. His unique combination of operational, audit, and compliance planning experience will be put to good use as leader to improve our risk mitigation governance and allow us to enhance our work in systems and products that are increasingly complex. Chris has an Accounting/Political Science degree from Luther College, is a CPA and is Certified Health Insurance Executive.

Chris enjoys cooking, wine tasting and working on home improvement projects. Before pursuing Accounting, Chris was originally a music major and played the French Horn.

Please join me in welcoming Chris to the team.

Thank you,

Eric

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13. Email from Mr. Zorn regarding the class action subrogation claims recoupment process which Internal Audit personnel were performing to recoup payments made for medical claims which the member did not pay. As of July 21, 2022, the Internal Audit Team has recovered over \$377,000 in claims payment recoupments. As stated in the Class Action Lawsuit Lien Processing and Recoupment of Funds Policy and Procedure created by the Internal Audit department, it is the policy of CareOregon to recoup any federal or state-funded monies paid by CareOregon or affiliates for medical claims for Medicare and/or Medicaid members who are participating in class action lawsuits related to installation and/or removal of defective medical manufacturers products (i.e., such as hip-replacement, transvaginal mesh, or other).<sup>19</sup>

<sup>19</sup> Class Action Lawsuit Lien Processing and Recoupment of Funds Policy and Procedure

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**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Thursday, June 30, 2022 4:25 PM  
**To:** Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>; Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** Subrog

I would like to be very clear – going forward I want to be copied on all emails/correspondence on any subro case, decision, etc.

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**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Monday, July 11, 2022 1:16 PM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Cc:** Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
**Subject:** RE: Joye Orcutt - Case/805174/Lien/900394#

Thanks for copying me, I'm OK with your options on this.

I want to be 100% clear on subro. It's especially frustrating to know that after some 8 months, we will have a role here. I do not want to hear "Chris as you know" or "as you are aware" at any future meetings or calls. I find both comments to be disrespectful. I see our involvement in subro as a 1) an operational responsibility that calls into question our independence and 2) a distraction from the core function of the team when we (as I see it) remain behind plan.

I want us out, 100% out, at the earliest date. Not interested in dealing with loose ends. Find an owner for these last few

Chris



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14. Paid Time-Off (PTO) Requests are not approved or are not approved timely.

- A) I requested PTO for the period June 21, 2022 to June 24, 2022 on May 20, 2022. My initial PTO request was to be off June 13, 2022 through June 17, 2022; however, I changed my PTO time to June 21, 2022 to June 24, 2022 to accommodate an Audit and Compliance Meeting. My request was in 'Pending' status until Mr. Zorn approved my time off request on June 30, 2022 (after the PTO dates requested).
- B) Submitted PTO request on December 23, 2021 for PTO dates January 3, 2022 to January 7, 2022. PTO request was never approved by Mr. Zorn and had to be processed by Tina Nguyen in Payroll on January 20, 2022.

- C) Submitted PTO request on September 21, 2021 for PTO date October 11, 2021. Request approved by Mr. Zorn on October 5, 2021.
- D) Submitted PTO request on September 21, 2021 for PTO date October 7, 2021. Request approved by Mr. Zorn on October 5, 2021.

<input type="button" value="Action"/> <input type="button" value="Edit"/> <input type="button" value="Remind"/> <input type="button" value="Cancel"/>								
Type	Description	Date Submitted	Hours	Request Status	Supervisor	Date Approved		
<input checked="" type="radio"/>	PAID TIME OFF	06/21/2022 to 06/24/2022:	06/09/2022 12:54 PM	32.00	Taken	Christian Zorn	06/30/2022 08:28 AM	a)
<input type="radio"/>	PAID TIME OFF	06/13/2022 to 06/17/2022:	05/20/2022 03:23 PM	0.00	Canceled			
<input type="radio"/>	PAID TIME OFF	03/07/2022 to 03/11/2022:	02/21/2022 10:47 AM	40.00	Taken	Christian Zorn	02/25/2022 02:03 PM	
<input type="radio"/>	PAID TIME OFF	02/28/2022 to 03/04/2022:	02/21/2022 10:47 AM	40.00	Taken	Christian Zorn	02/25/2022 02:04 PM	
<input type="radio"/>	PAID TIME OFF	01/03/2022 to 01/07/2022:	12/23/2021 10:00 AM	40.00	Taken	Tina Nguyen	01/20/2022 12:59 PM	b)
<input type="radio"/>	PTO SICK	11/09/2021 to 11/09/2021:	11/10/2021 06:42 AM	8.00	Taken	Tina Nguyen	11/22/2021 10:12 AM	
<input type="radio"/>	PAID TIME OFF	10/28/2021 to 10/29/2021:	10/14/2021 01:32 PM	16.00	Taken	Christian Zorn	10/20/2021 09:26 AM	
<input type="radio"/>	PAID TIME OFF	10/11/2021 to 10/11/2021:	09/21/2021 09:01 AM	8.00	Taken	Christian Zorn	10/05/2021 02:49 PM	c)
<input type="radio"/>	PAID TIME OFF	10/07/2021 to 10/08/2021:	09/21/2021 09:01 AM	16.00	Taken	Christian Zorn	10/05/2021 02:49 PM	d)

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15. Tone of email from Mr. Zorn to me regarding assisting Pricewaterhouse Coopers on an external audit they are performing:

From: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Sent: Thursday, June 16, 2022 9:30 AM  
To: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Subject: FW: PwC: Internal Audit Dashboard

I am expecting written responses to the logistical questions from you to me by 2 pm today



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From: Christopher Thompson (US) <[christopher.j.thompson@pwc.com](mailto:christopher.j.thompson@pwc.com)>  
Sent: Wednesday, June 15, 2022 6:02 PM  
To: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>; Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Cc: David Merriam (US) <[david.r.merriam@pwc.com](mailto:david.r.merriam@pwc.com)>; Nathan Mueller (US) <[nathan.mueller@pwc.com](mailto:nathan.mueller@pwc.com)>; Prashant Kundu (US) <[prashant.kundu@pwc.com](mailto:prashant.kundu@pwc.com)>  
Subject: PwC: Internal Audit Dashboard

Chris and Robert,

We have scheduled a meeting for us to connect tomorrow at 3:00pm with the assistance of Rene Polly.

Attached is the Dashboard and you will also find our general logistical questions on slide 7.

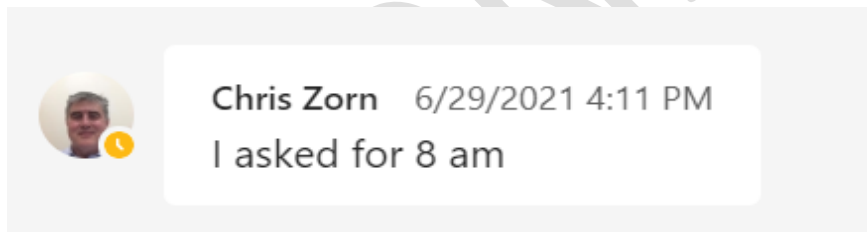
We look forward to connecting with you tomorrow afternoon!

**Christopher Thompson**  
PwC | Director  
+1 (951) 316 5224  
[PricewaterhouseCoopers LLP](https://www.pwc.com)

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16. Internal Audit personnel are assigned administrative tasks such as scheduling meetings for Mr. Zorn. A more efficient and effective approach would be for the individual who wants to meet to be proactive and schedule the meetings:

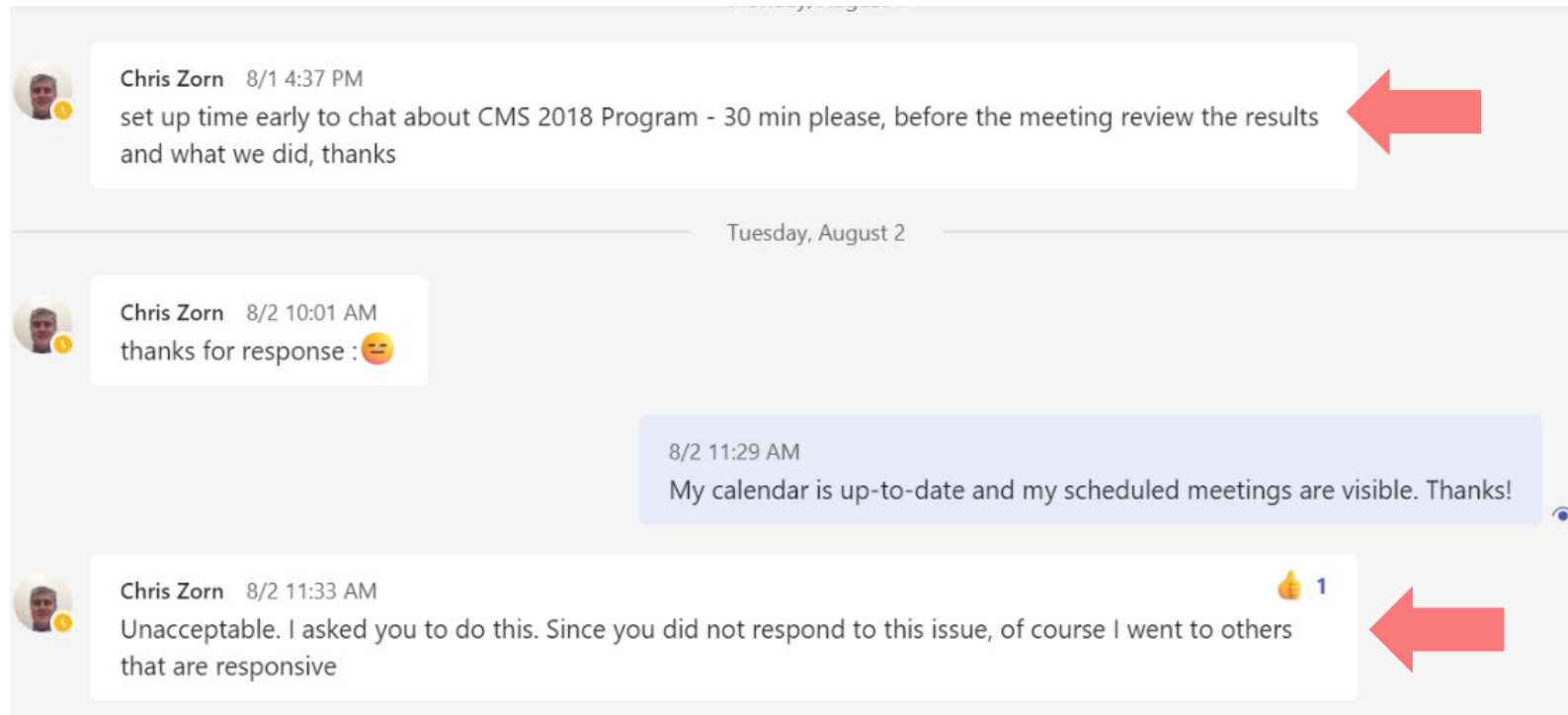
A) This was the response when I scheduled a meeting at 9 am instead of 8 am.



*(Note: Mr. Zorn had been with the organization for less than three (3) weeks).*

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B) Request for me to schedule a meeting and the 'Tone' in the messages from Mr. Zorn:



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C) Email requesting Stacey Ross to create an IS Ticket to allow Mr. Zorn to access the Audit Directory on the Shared Drive.

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Thursday, February 17, 2022 12:16 PM  
**To:** Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
**Subject:** RE: IA Areas of Non-Compliance Issues

Simple, because I do not have access to your Audit directory. That's something the directory owner, maybe Robert may have. Put in and IT request to get this corrected please. Thanks for the copy



**From:** Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
**Sent:** Thursday, February 17, 2022 12:13 PM  
**To:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Subject:** RE: IA Areas of Non-Compliance Issues

Hi Chris,

I'm not sure why you could not access the link I provided, I was able to open it. I have gone ahead and attached a copy of the template.

Please let me know if I can provide anything else.

Stacey

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Thursday, February 17, 2022 12:04 PM  
**To:** Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
**Cc:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** RE: IA Areas of Non-Compliance Issues

Unable to access this *directory*. Please correct and send me a copy please  
C

**(Note: this was eight (8) months after Mr. Zorn's employment started at CareOregon).**

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D) Request to reschedule meeting after Mr. Zorn scheduled a meeting over my 'Check-In' with the Senior Internal Auditor:

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Wednesday, June 15, 2022 9:39 AM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** RE: IA Status Update

Schedule 1 hour for us tomorrow



-----Original Appointment-----

**From:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Sent:** Wednesday, June 15, 2022 9:24 AM  
**To:** Chris Zorn

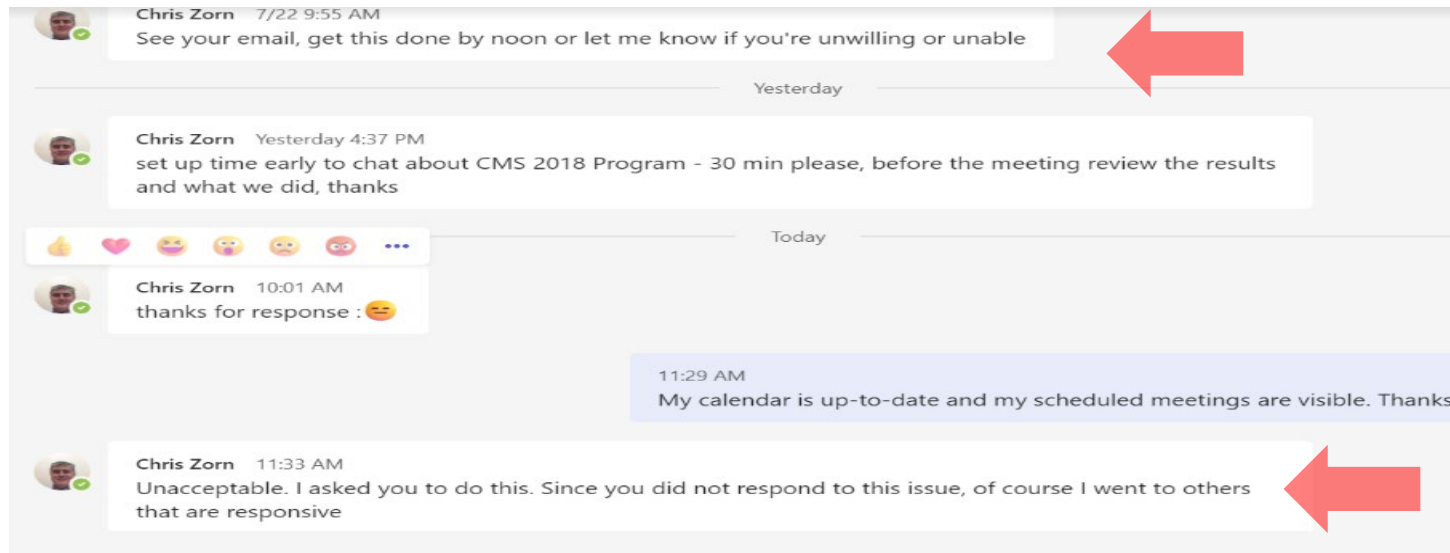
**Subject:** Declined: IA Status Update  
**When:** Thursday, June 16, 2022 1:00 PM-2:00 PM (UTC-08:00) Pacific Time (US & Canada).  
**Where:** Microsoft Teams Meeting

I have a check in with Brian at this time.

Thanks!

\*\*\*\*\*

E) Tone of message:



\*\*\*\*\*


F) Requesting me to schedule meeting with CareOregon personnel and PwC personnel:

From: Chris Zorn <zornc@careoregon.org>  
Sent: Friday, June 3, 2022 9:20 AM  
To: Robert Snoddy <snoddyrj@careoregon.org>  
Subject: RE: CareOregon IA 2022 - Availability for Next Week

Change of plans

I would like you to arrange the call for next week  
You, PwC, both below and whomever  
Add me as optional please  
Thanks  
C

...

RE: CareOregon IA 2022 - Availability for Next Week 

**Robert Snoddy**

to Chris

Hi Chris,

Angela Mitchell and Peter Hedgecock, Actuarial Services Manager would be a good starting point.

My calendar is up to date and open times for me next week include:

- Monday – 9am to 1 pm
- Tuesday – 9 am to 4 pm
- Wednesday – 12 pm – 3 pm
- Thursday – 11 am – 1 pm
- Friday – 9 am – 3 pm

Thanks!  
Robert

---

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Thursday, June 2, 2022 1:09 PM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** FW: CareOregon IA 2022 - Availability for Next Week

Give me dates times - I'll add you. Who from Finance would also be a good person to ask




---

**From:** Prashant Kundu (US) <[prashant.kundu@pwc.com](mailto:prashant.kundu@pwc.com)>  
**Sent:** Thursday, June 2, 2022 12:30 PM  
**To:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Cc:** Christopher Thompson (US) <[christopher.j.thompson@pwc.com](mailto:christopher.j.thompson@pwc.com)>; Nathan Mueller (US) <[nathan.mueller@pwc.com](mailto:nathan.mueller@pwc.com)>  
**Subject:** CareOregon IA 2022 - Availability for Next Week

Hello Chris,

Hope you have been well!  
Could you provide us some available times for you next week so we can coordinate a 30-minute meeting between you and our Actuarial specialists?

\*\*\*\*\*

17. Tone of email to Stacey Ross for misspelling Julia as Julie:

---

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Monday, March 28, 2022 4:44 PM  
**To:** Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
**Cc:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** RE: IA Areas of Non-Compliance Issues

You misspelled Julia as Julie in the spreadsheet. That's embarrassing to our team and myself. My relationship with Julia is one of the key relationships that I'm working on for 2022 for Audit, Compliance and DO. I want to make sure you understand the importance of self-review. I have already done the apologies

\*\*\*\*\*

18. Email response from Mr. Zorn to Yuliya Edwards, Senior Internal Auditor. Yuliya was inquiring if Mr. Zorn had any questions on the System and Facility Access Audit draft report submitted to him for review and instead of scheduling a meeting, he requested that she schedule the meeting:

---

From: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Sent: Friday, August 20, 2021 9:22 AM  
To: Yuliya Edwards <[edwardsy@careoregon.org](mailto:edwardsy@careoregon.org)>  
Subject: RE: System and Facility Access Audit

Yuliya, if I had any questions I would have asked, thank you. I've meet with Leaders on this and will share verbally with you today. Make 15 for us please

---

From: Yuliya Edwards <[edwardsy@careoregon.org](mailto:edwardsy@careoregon.org)>  
Sent: Friday, August 20, 2021 9:19 AM  
To: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Cc: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Subject: RE: System and Facility Access Audit



Good morning,

About three weeks ago, we submitted the draft report for the Timely Removal of System and Facility Access for Terminated Employees follow-up audit for your review. Do you have any questions regarding the attached report?

Thanks,

**Yuliya I. Edwards, MBA, CFE, CISA**  
Senior Internal Auditor  
Work | 503-416-5901  
[edwardsy@careoregon.org](mailto:edwardsy@careoregon.org)  
[www.careoregon.org](http://www.careoregon.org)



\*\*\*\*\*



19. Email from Mr. Zorn on August 10, 2021 criticizing new employee HIPAA training delivery, technology, and content and my response related to new employee HIPAA training.

*(Note: Compliance and Fraud, Waste, and Abuse training and HIPAA training had been reassigned to the Compliance department in 2018).*

RE: HIPAA Training

 Robert Snoddy  
To  Chris Zorn

 Reply  Reply

 Please treat this as Confidential.

1 2 3 4 5 6 7 8 9 10 11

Hi Chris,

HIPAA training and content of the HIPAA training is handled by the Compliance department. I have not had any oversight of HIPAA training or content of HIPAA training since 2018.

Thanks!  
Robert

---

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Tuesday, August 10, 2021 4:18 PM  
**To:** Robert Snoddy <[snoddy@careoregon.org](mailto:snoddy@careoregon.org)>  
**Subject:** HIPAA Training  
**Sensitivity:** Confidential

Based on feedback I received, training went very poorly today in delivery, technology and content. You wrote the content?  
C



**Christian Zorn** | Pronouns: He/Him

\*\*\*\*\*

20. I was instructed by Mr. Zorn to establish a Secure File Transfer Protocol (SFTP) site for the Pharmacy audit being conducted by Pricewaterhouse Coppers (PWC). I was assigned the task of creating and submitting the Information System ticket for this site to be created.

---

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Friday, July 22, 2022 11:05 AM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** RE: PwC Audit - File Transfers

Check on status, communicate with IT and Amber, give me a ticket number



---

**From:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Sent:** Friday, July 22, 2022 11:04 AM  
**To:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Subject:** RE: PwC Audit - File Transfers

Ticket submitted to IS yesterday as requested.

**Robert Snoddy, CIA, CHC, CHPC**  
Manager, Audit  
Voice | 503-416-3677 | Fax | 503-416-8117  
[careoregon.org](http://careoregon.org)



Please consider your environmental responsibility before printing this e-mail

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**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Friday, July 22, 2022 9:55 AM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** FW: PwC Audit - File Transfers  
**Importance:** High

I asked at 830 Thurs to get this done yesterday by end of day...  
Why did you not get this done





**From:** Amber Corbett <[corbetta@careoregon.org](mailto:corbetta@careoregon.org)>  
**Sent:** Friday, July 22, 2022 9:48 AM  
**To:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>; Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Cc:** Jessica Saucedo <[saucedaj@careoregon.org](mailto:saucedaj@careoregon.org)>  
**Subject:** RE: PwC Audit - File Transfers

Good Morning,

I thought I would check back on this. I need to submit some of my items today.

Thanks,  
Amber

---

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Thursday, July 21, 2022 8:31 AM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Cc:** Jessica Saucedo <[saucedaj@careoregon.org](mailto:saucedaj@careoregon.org)>; Amber Corbett <[corbetta@careoregon.org](mailto:corbetta@careoregon.org)>  
**Subject:** FW: PwC Audit - File Transfers

Robert,  
Please take care of creating something secure along the lines of what Amber suggested. I would like this done by end of day please  
Chris

\*\*\*\*\*

21. Request from Mr. Zorn for me to release an audit report when I was instructed that all audit reports would be released by him:

---

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Tuesday, May 24, 2022 8:56 AM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** RE: HRA/HRS

I'm pretty busy and thought you could help me. Never mind



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**From:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Sent:** Tuesday, May 24, 2022 8:53 AM  
**To:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Subject:** RE: HRA/HRS

Hi Chris,

My understanding was that all audit reports would be released by you. Has this changed?

Please advise.

Thanks!  
Robert

---

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Monday, May 23, 2022 4:27 PM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Cc:** Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
**Subject:** RE: HRA/HRS

Approved for immediate release. Can you please? Thanks  
Chris

---

**From:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Sent:** Thursday, May 12, 2022 1:32 PM  
**To:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Subject:** RE: HRA/HRS

Good afternoon,

Revised report attached for review and dissemination.

Thanks!  
Robert

\*\*\*\*\*

22. Email sent to Yuliya Edwards and I related to Timely Removal of System and Facility Access Audit and my response back to Mr. Zorn related to comments regarding *'Ineffective Internal Audit communications to escalate earlier, and lack of Internal Audit actions from November 2019 to February 2021'*.

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**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Monday, September 13, 2021 12:47 PM  
**To:** Yuliya Edwards <[edwardsy@careoregon.org](mailto:edwardsy@careoregon.org)>  
**Cc:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** FW: Terminated Employees Access

For our discussion

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**From:** Chris Zorn  
**Sent:** Monday, September 13, 2021 10:24 AM  
**To:** Amy Dowd <[dowda@careoregon.org](mailto:dowda@careoregon.org)>; James Mason <[masonj@careoregon.org](mailto:masonj@careoregon.org)>  
**Subject:** Terminated Employees Access

I'm sending this first to you and then to Eric late in the day.

The first document is a 1-page summary of the findings, the second is the draft audit report

Unfortunately I'm compelled to escalate this audit result. By way of background, in July 2019 the audit team reported significant exceptions where physical and IT access were not removed for terminated employees. This audit was performed again in Oct 2019, Nov 2019, Feb 2021 and then most recently in Jul 2021. All audits reported exception rates from 25% to 85%. These findings are not in dispute.

The organization has yet to control this despite some changes with IT and Facilities. I am trying to leverage Amy's team (IT and Fac) with HR group and have had meetings with both. We need an effective and immediate solution. I don't believe that's difficult, costly or time-consuming. This is a significant risk, an organizational control and safety risk.

In my experience, risks/findings like these are often reported to regulators. Even if not reported, the audit report itself would be made available during a Federal or State audit. The report will go to CO Board (and CCOs) next month. Having a strong plan/response will help me and the organization.

Of course **the response (that I need finalized before month-end) is the priority.**

The issue brought up concerns about

3. The time taken to effectively resolve what was first communicated as a critical issue. Perhaps this might be due to ineffective internal audit communication to escalate earlier.
4. Lack of Internal Audit actions from Nov 2019 to Feb 2021 (that had reported a significant finding but waited 15 months for new action). I would have expected my predecessor to have this as a top priority.
5. Access to facilities and IT in general.

I am looking for support on this. Using my past experience as a reference with understanding of the CO organization, the overall control will need a senior leader owner. Most often I've seen this as an HR oversight job. Control elements being owned by IT, Fac, and the Business leaders.

Chris

**Christian Zorn** | Pronouns: He/Him  
Vice President, Audit and Compliance  
Phone | [503-416-4700](tel:503-416-4700) | Mobile [818-203-6923](tel:818-203-6923)  
[careoregon.org](http://careoregon.org)



My response to Mr. Zorn regarding the email above:

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**From:** Chris Zorn <zornc@careoregon.org>  
**Sent:** Monday, September 13, 2021 4:37 PM  
**To:** Robert Snoddy <snoddyr@careoregon.org>  
**Subject:** RE: Terminated Employees Access

Robert – We will discuss content and tone at your 1:1.

---

**From:** Robert Snoddy <snoddyr@careoregon.org>  
**Sent:** Monday, September 13, 2021 4:18 PM  
**To:** Chris Zorn <zornc@careoregon.org>; Yuliya Edwards <edwardsy@careoregon.org>  
**Subject:** RE: Terminated Employees Access

Hi Chris,

I need to stand my ground for myself and department on statements made in the email below to Amy Dowd and James Mason related to the Timely Removal of System and Facility Access Audit.

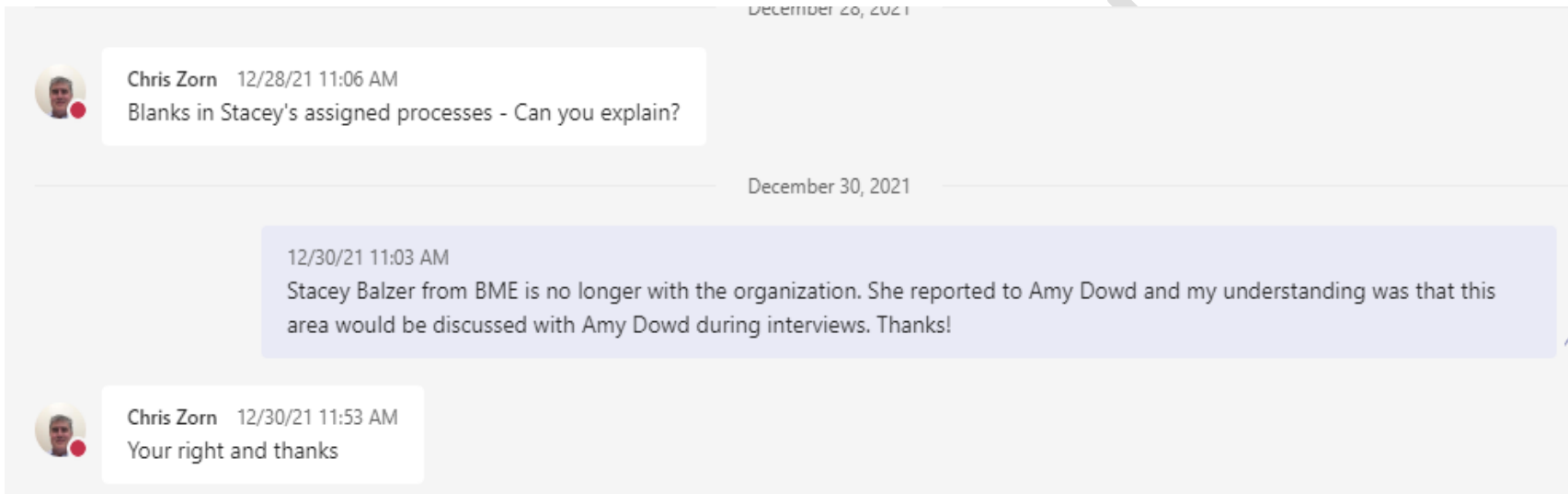
1. The time taken to effectively resolve what was first communicated as a critical issue. Perhaps this might be due to ineffective internal audit communication to escalate earlier. *Please realize and understand that the first three Revocation of System and Facility Access Reviews were just that – Reviews. The results of the three Revocation of System and Facility Access Reviews were disseminated to Amy Dowd, Chantay, Nate and others so that action could be taken; however, little if any action was taken to adequately address the timely removal of system and facility access for terminated employees. When action was not taken after three Revocation of System and Facility Access Reviews, we escalated this operation to an actual Audit so there would be a formal action plan for any Findings identified. At no point was there ineffective internal audit communication. As to why the timely removal of system and facility access for terminated employees issue has not been adequately addressed, we need to call it what it is and that is a lack of accountability and responsibility.*
2. Lack of Internal Audit actions from Nov 2019 to Feb 2021 (that had reported a significant finding but waited 15 months for new action). I would have expected my predecessor to have this as a top priority. *See response for number 1 above.*

Please set aside time to discuss this comment in our meeting tomorrow morning.

Robert

\*\*\*\*\*

23. Inquiry from Mr. Zorn regarding Risk Assessment and assumption that Stacey Ross did not perform the work assigned to her of interviewing Stacy Balzer with Brand, Marketing, and Engagement department. Stacy Balzer terminated employment and Mr. Zorn stated that he would interview the Chief Operating Officer instead.



\*\*\*\*\*

CONFIDENTIAL

24. Email to Stacey Ross inquiring about her skill set.

From: Stacey Ross  
Sent: Wednesday, March 9, 2022 11:09 AM  
To: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Subject: RE: Claims Pulls

Hi Chris,

On the first business day of each month I receive IS claims reports which include all claims that were processed, paid and or denied from the previous month so the reports are always a month behind but do include all data. Depending on what we are looking for I have been able to pull claims for specific provider types and possibly some services for claims audits that we have performed. However, for example if you are looking for edit driven processing claim types then we have to put an IS ticket in to obtain the claims as edits are not included in the monthly reports that I receive. Hence, it really depends what you are looking for. I also have the capability to run some claims data reports through the QNXT Reporting Services portal.

It is worth mentioning that if CareOregon is using a third party delegated entity to process claims then we generally request that information from IS.

As far as my excel skills, I have taken multiple excel classes through Kenetic Technology Solutions as part of my training. I feel as though I have good knowledge with excel and it really has been our only platform for all of the testwork associated with our audit reports.

Hopefully this helps Chris but please let me know if you need further clarification.

Stacey

---

From: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Sent: Wednesday, March 9, 2022 9:42 AM  
To: Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
Subject: Claims Pulls

Do you have the data sources and skills to perform claims extracts without assistance?  
Does this include all claims platforms?  
Can you give me a sense of your Excel skills?



Christian Zorn | Pronouns: He/Him  
Vice President, Audit and Compliance  
Chief Compliance Officer  
Phone | 503-416-4700 | Mobile 818-203-6923  
[careoregon.org](http://careoregon.org)



\*\*\*\*\*



25. Email response from Mr. Zorn to me related to Health Risk Assessment/Health Risk Screening Audit:

From: Chris Zorn <zornc@careoregon.org>  
Sent: Thursday, April 21, 2022 11:10 AM  
To: Robert Snoddy <snoddyr@careoregon.org>  
Cc: Stacey Ross <rosss@careoregon.org>  
Subject: RE: HRA\_HRS Audit April 2022\_MF-JW Comments

Thank you for the feedback. Well aware of the agreement to include the CAP in the report in some way. I'm considering exactly how to adjust the report for the HRA cap. There are pros/cons to each of the approaches I am considering. Remarkable but typical that you don't simply reach to me directly to help solve a problem. As we discussed many times earlier, I expect that behavior from my leaders. To help me decide, for the CAP that was included in the draft from John

1. Did we do anything to validate this plan. I never asked for that but curious.
2. Is this the first time you've seen that plan.

Let me address your next comments

"Revising the report to only report on the Medicare HRA operation and not reporting on the non-compliance with the Medicaid HRA process doesn't seem transparent"

- In keeping with your preferred communication style, you are making assumptions as to what I may do. You jump to making a conclusion as to what I will do.
- I would expect my IA leader to arrange a discussion to discuss alternatives. You rarely do that and prefer to litigate your opinions via emails with a captive audience.
- Provide me the dates of the original citation of HRS and any follow ups by COB today.

"It appears we are revising the report to satisfy the client and are not being independent on the Findings or what was agreed upon in our meeting on November 29, 2021"

- We will always make report revisions for errors, improving communication, etc.
- Internal Audit reports will not be platforms for personal opinions.
- Our/My goal is to ensure that corrections are made, leaders accountable, and our IA communications are clear.
- What goes in or out of reports is my final call.
- I will be making additional changes to reports, responsibilities and protocols based on your feedback

Chris

---

From: Robert Snoddy <snoddyr@careoregon.org>  
Sent: Thursday, April 21, 2022 10:09 AM  
To: Chris Zorn <zornc@careoregon.org>; Stacey Ross <rosss@careoregon.org>  
Subject: RE: HRA\_HRS Audit April 2022\_MF-JW Comments

Hi Chris!!!

We had a conversation on November 29, 2021 with Chris Senz, Jonathan Weedman and you where it was indicated we will not perform testing on the Medicaid HRS as this operation has not been in compliance with requirements from the 2020 CCO Contract (effective October 1, 2019). It was agreed upon during the meeting that we would only do testing on the Medicare HRAs but we would include verbiage in the report indicating that the Medicaid HRS process has not been in compliance and would include a Corrective Action Plan on how the organization is to be in compliance with OHA requirements.

-  
Revising the report to only report on the Medicare HRA operation and not reporting on the non-compliance with the Medicaid HRA process doesn't seem transparent. It appears we are revising the report to satisfy the client and are not being independent on the Findings or what was agreed upon in our meeting on November 29, 2021.

Thanks!!!

Robert

---

From: Chris Zorn <zornc@careoregon.org>  
Sent: Thursday, April 21, 2022 8:54 AM  
To: Robert Snoddy <snoddyr@careoregon.org>; Stacey Ross <rosss@careoregon.org>  
Subject: FW: HRA\_HRS Audit April 2022\_MF-JW Comments

Having talked through report and audit, we'll be making some changes. To confirm, you did no work on HRS correct?

\*\*\*\*\*

26. My expense reimbursement for \$595 was submitted December 8, 2021. I followed up with Mr. Zorn on three separate occasions regarding the reimbursement. Mr. Zorn did not submit the expense report appropriately to the Finance department. As such, I received my expense check on May 21, 2022, more than five (5) months after submission. Response from Resa Kee in the Finance department to Mr. Zorn regarding the reimbursement process.

---

**From:** Resa Kee <[keer@careoregon.org](mailto:keer@careoregon.org)>  
**Sent:** Tuesday, March 15, 2022 10:56 PM  
**To:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Cc:** Collin Bounds <[boundsc@careoregon.org](mailto:boundsc@careoregon.org)>; Andi Zona <[zонаa@careoregon.org](mailto:zонаa@careoregon.org)>; Tony Jackson <[jacksont@careoregon.org](mailto:jacksont@careoregon.org)>  
**Subject:** RE: Expense Report

Chris – I appreciate you taking responsibility for the late submission. **It isn't fair to hold employees accountable for their supervisors actions.** Since I can see an electronic date when the employee completed this submission, **we will process this report.**

It is important to understand for CareOregon to have tax free expense reimbursements we need an accountable plan. Two required components of an accountable plan are substantiation to be submit within a reasonable amount of time and a business purpose. Our policy requires 30 days for submission and part of the substantiation is the supervisor's approval which helps support the business connection piece of the requirement. Let me know if you have any questions. Thanks.

- Resa  
x5997

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**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Tuesday, March 15, 2022 12:48 PM  
**To:** CO VendorInvoices <[COVendorInvoices@careoregon.org](mailto:COVendorInvoices@careoregon.org)>  
**Subject:** RE: Expense Report

Dec 8th

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**From:** CO VendorInvoices <[COVendorInvoices@careoregon.org](mailto:COVendorInvoices@careoregon.org)>  
**Sent:** Tuesday, March 15, 2022 12:47 PM  
**To:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Subject:** RE: Expense Report

Hi Chris,

These expenses are from 2021, which we are no longer accepting for reimbursement. Could you tell me when Robert first submitted this to you?

Thank you,

**Collin Bounds**

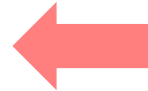
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27. Response from Mr. Zorn to me regarding my inquiry if I could attend a conference to obtain new knowledge and stay up-to-date in emerging trends in health insurance and receive Continuing Education Units (CEUs) keep my three professional certifications active.

**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Tuesday, April 19, 2022 5:05 PM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** RE: CEUs

Declined approval, for emerging risks and solutions in research institutions, that's not us really



**From:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Sent:** Tuesday, April 19, 2022 11:37 AM  
**To:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Subject:** CEUs

Good morning Chris!!

Asking for approval to attend the HCCA Research Compliance Conference in Anaheim, CA on June 8-10, 2022. Price for the conference is \$899 with additional expenses for airfare/hotel/lodging.

May I register for this conference? Brochure attached.

Thanks!

**Robert Snoddy, CIA, CHC, CHPC**  
Manager, Audit  
Voice | 503-416-3677 | Fax | 503-416-8117  
[careoregon.org](http://careoregon.org)



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28. Email from Mr. Zorn regarding FMLA leave I took on July 7, 2022 due to work-related stress and anxiety and inquiry if I was working on Friday, July 15, 2022.

-----Original Message-----

From: Robert Snoddy  
Sent: Monday, July 18, 2022 9:50 AM  
To: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Subject: RE: UKG Pro Timesheet Approval Requested By Robert Snoddy

I as reading the HCCA magazine and was not checking email.

My FMLA time was reported to the Standard as required. My understanding is that as a salaried employee and I worked on Thursday, July 7, 2022 I am not required to take PTO.

Thanks!

Robert Snoddy, CIA, CHC, CHPC  
Manager, Audit  
Voice | 503-416-3677 | Fax | 503-416-8117 [careoregon.org](http://careoregon.org)

-----Original message-----

From: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Sent: Monday, July 18, 2022 9:43 AM  
To: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Subject: RE: UKG Pro Timesheet Approval Requested By Robert Snoddy

Robert,

This is now the third and final time - why did you delay submitting that time sheet until this morning?  
And why did you not post the FHML when you posted today - was that a simple oversight C

-----Original Message-----

From: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Sent: Monday, July 18, 2022 9:31 AM  
To: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Subject: RE: UKG Pro Timesheet Approval Requested By Robert Snoddy

I was working on Friday and did not take time off.

Robert Snoddy, CIA, CHC, CHPC  
Manager, Audit  
Voice | 503-416-3677 | Fax | 503-416-8117 [careoregon.org](http://careoregon.org)

-----Original message-----

From: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Sent: Monday, July 18, 2022 9:29 AM  
To: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Subject: RE: UKG Pro Timesheet Approval Requested By Robert Snoddy

Yea I know that. In addition to the reporting your do for the standard, HR has advised me that you need to post that time on your timesheet. I did not see that Were you off on Friday. If so, post that time off If you were not off, explain the delay please

-----Original Message-----

From: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Sent: Monday, July 18, 2022 9:26 AM  
To: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Subject: RE: UKG Pro Timesheet Approval Requested By Robert Snoddy

I was on FMLA on July 7, 2022 for 4 hours and this has been reported to the Standard.

Robert Snoddy, CIA, CHC, CHPC  
Manager, Audit  
Voice | 503-416-3677 | Fax | 503-416-8117 [careoregon.org](http://careoregon.org)



-----Original Message-----

From: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Sent: Monday, July 18, 2022 8:57 AM  
To: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Subject: FW: UKG Pro Timesheet Approval Requested By Robert Snoddy

I sent this reminder at 230 Fri. You just responded, did you take time off Friday



---

From: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Sent: Friday, July 15, 2022 2:23 PM  
To: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Subject: Time Sheet

Post absence time for 7/7 and submit timesheet

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29. Email response to Jonathan Weedman, Vice President Population Health and 'Tone' of response from Mr. Zorn related to Community Housing and Assistance Audit.

---

**From:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Sent:** Friday, June 10, 2022 9:43 AM  
**To:** Jonathan Weedman <[weedmanj@careoregon.org](mailto:weedmanj@careoregon.org)>  
**Cc:** Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
**Subject:** Community Housing and Assistance Pre-Audit, June 2022

Good morning Jonathan,

Internal Audit will be conducting an audit of the Community Housing and Assistance operation. In preparation of the audit, can you please send any policies and procedures, desk manuals or other documentation related to the Community Housing and Assistance function. We will review the information and then schedule a formal Entrance Conference to discuss the audit steps.

Please have these to me by next Wednesday, June 15, 2022.

Please let me know of any questions.

Thanks!

**Robert Snoddy, CIA, CHC, CHPC**  
Manager, Audit  
Voice | 503-416-3677 | Fax | 503-416-8117  
[careoregon.org](http://careoregon.org)



---

**From:** Jonathan Weedman <[weedmanj@careoregon.org](mailto:weedmanj@careoregon.org)>  
**Sent:** Friday, June 10, 2022 9:47 AM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Cc:** Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
**Subject:** RE: Community Housing and Assistance Pre-Audit, June 2022

Hey Robert,  
Thanks so much. I am sorry to say I am not sure what this even means. What exactly is Community Housing and Assistance? Thanks so much.

Jonathan

**Jonathan K. Weedman, LPC, CCTP** | Pronouns: He/Him/His  
Vice President, Population Health  
Work | 503-416-5890 | Mobile | 503-913-8603  
[careoregon.org](http://careoregon.org)



**From:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Sent:** Wednesday, June 15, 2022 9:23 AM  
**To:** Jonathan Weedman <[weedmanj@careoregon.org](mailto:weedmanj@careoregon.org)>  
**Cc:** Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
**Subject:** RE: Community Housing and Assistance Pre-Audit, June 2022

Hi Jonathan,

We are performing an audit to of the Health Resilience, Transitions and Palliative Care Programs to provide housing resources and eviction prevention for high risk CareOregon members. Additionally, we will be reviewing the process of how the Navigation and Housing Supervisor partners with external housing agencies and internal CareOregon staff to leverage existing or establish new, targeted housing interventions to improve member health.

If this process does not fall under your operation, please let me know and I'll try to identify the correct department that performs this function. In preparation of the audit, can you please send any policies and procedures, desk manuals or other documentation related to the Community Housing and Assistance function. We will review the information and then schedule a formal Entrance Conference to discuss the audit steps.

Thanks much,

**Robert Snoddy, CIA, CHC, CHPC**  
Manager, Audit  
Voice | 503-416-3677 | Fax | 503-416-8117  
[careoregon.org](http://careoregon.org)



**From:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Sent:** Wednesday, June 15, 2022 9:44 AM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** FW: Community Housing and Assistance Pre-Audit, June 2022

Discuss this with me during our 1:1 tomorrow. I expect all internal audit scopes to be reviewed with me before sending these out



**From:** Jonathan Weedman <[weedmanj@careoregon.org](mailto:weedmanj@careoregon.org)>  
**Sent:** Wednesday, June 15, 2022 9:30 AM  
**To:** Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Subject:** FW: Community Housing and Assistance Pre-Audit, June 2022

Morning! Hope you are well. I am super confused by this request. Should I meet with you about it or Robert? I am happy to do whatever needs to be done but other than transitions, there is no regulatory requirement we do these activities although we certainly do for clinical and health outcome reasons. I am mostly concerned as there is actually no standard to this work (outside of the transitions activities) and so I am curious how an audit will even be performed. Finally, Health Resilience is not a program but a role and Palliative Care doesn't live with me it lives with HCP. As for housing, the supervisor doesn't partner with external agencies really it's a shared responsibility and the housing case managers do a lot of this work.

Let me know who I should go to for more clarity. Thanks!

**Jonathan K. Weedman, LPC, CCTP** | Pronouns: He/Him/His  
Vice President, Population Health  
Work | 503-416-5890 | Mobile | 503-913-8603  
[careoregon.org](http://careoregon.org)

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**ISSUE B: SYSTEMIC DENIAL OF CAREER ADVANCEMENT OPPORTUNITIES TO INTERNAL AUDIT**

1. **Balance of Management and Membership: Expansion without Inclusion of Internal Audit Personnel**

Since 2016, I have been performing duties at the Internal Audit Director level and above. These duties include coordinating and facilitating the CMS Program Audit in 2018, coordinating and facilitating CMS Timeliness Monitoring Project Reviews for 2018, 2019, and 2021, creation of Compliance, Fraud, Waste, and Abuse, and HIPAA training and conducting this training for new hire and existing employees, managing the internal audit function for CareOregon and affiliated entities, and other relevant CMS and OHA audit/compliance projects. Additionally, the personnel of the CareOregon Internal Audit department who I manage perform the audit function for CareOregon, CareOregon Advantage, Health Share of Oregon, Columbia Pacific CCO, Jackson Care Connect CCO, and HouseCall Providers operations, however, an Internal Audit Director position within CareOregon has not been created. This does not seem appropriate for an industry where compliance with federal and state regulations is a high priority.

Moreover, since June 2016 to present, I have applied for forty-two (42) positions within CareOregon and affiliates posted on CareOregon’s SuccessFactors website. Additionally, my resume and other relevant career information have been uploaded to SuccessFactors since the platform was initiated in April 2018. Managing the audit function for the past fifteen (15) years has allowed me to develop very transferable skills which should be considered for the opportunities applied for; however, I have only been interviewed for two (2) positions from the forty-two (42) positions applied for. I have seen opportunities posted in SuccessFactors where I could have added significant value to the operation and organization, but I was not provided the opportunity to interview for these positions. Additionally, I have seen positions created within CareOregon and affiliated entities operations; however, these positions may not have been posted for recruiting internally and are typically filled with individuals external to the organization.

I cannot understand why as an internal employee I have not been allowed the opportunity to interview for the positions as I met most position requirements. Personally, I feel there is a sense of inequality towards my entire department and me. I suspect that this is due to my position as the Internal Audit Manager and my team’s identification of areas of non-compliance within the operation.

In July 2015, CareOregon’s organizational structure consisted of the following senior management positions:

<p><u>Chiefs (4)</u></p> <ul style="list-style-type: none"> <li>• Chief Executive Officer</li> <li>• Chief Financial Officer</li> <li>• Chief Network Officer</li> <li>• Chief Operations Officer</li> </ul>	<p><u>Executive Directors (2)</u></p> <ul style="list-style-type: none"> <li>• CCO Partnership and Development</li> <li>• Medicare</li> </ul>	<p><u>Directors (9)</u></p> <ul style="list-style-type: none"> <li>• Human Resources</li> <li>• Public Policy</li> <li>• Community Care Programs</li> <li>• Network and Clinical Support</li> <li>• Dental</li> <li>• Pharmacy</li> <li>• OPEX</li> <li>• Claims and Customer Service</li> <li>• Info Systems</li> </ul>	
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From 2015 to present, the organization has increased to a structure that now consists of seven (7) Chief positions, 29 Vice President positions, and 47 Director positions, however, an Internal Audit Director position has not been created. Additionally, the member counts of CareOregon and affiliated entities have not increased substantially to necessitate this drastic increase in senior management positions, and it appears that 'economies of scale' for operational processes are not understood and/or utilized by senior management to improve operational efficiencies and effectiveness.

Date	June 25, 2015			March 2019		February 2, 2021	April 19, 2022
Employee Counts	528			749		968	1,032
Date	July 2015	April 2016	June 2017	January 2019	January 2020	January 2021	January 2022
OHP Member Counts (HSO, CPCCO, and JCC)	225,795	202,265	176,045	361,561	391,920	458,221	494,632

**Reference:** All Staff Meetings, <https://www.oregon.gov/oha/hsd/ohp/pages/reports.aspx>

As of August 2, 2022, **there are 1,072 personnel working at CareOregon and affiliated entities; 108 open positions posted, and a total of 680 position descriptions**. Instead of ensuring operational process are as efficient and effective as possible, positions seem to be created.

**Org Chart – July 5, 2022**

**Chief Positions (7)**

- |  |
|--|
| <ol style="list-style-type: none"> <li>1. Eric Hunter* – Chief Executive Officer</li> <li>2. Teresa Learn – Chief Financial Officer</li> <li>3. Amy Dowd* – Chief Operating Officer</li> <li>4. Amit Shah – Chief Medical Officer</li> <li>5. James Mason* – Chief Equity, Diversity, and Inclusion Officer</li> <li>6. Nora Leibowitz* – Chief Strategy Officer</li> <li>7. Jeremiah Rigsby – Chief of Staff</li> </ol> |
|--|

\* = External Hire

**Vice President Positions (29)**

<ol style="list-style-type: none"> <li>1. Chantay Reid - HR</li> <li>2. Christian Zorn* – Audit and Compliance</li> <li>3. Nate Corley - IS</li> <li>4. Jonathan Weedman – Population Health</li> <li>5. Rebecca Ramsay - HCP</li> <li>6. Jill Archer – Behavioral Health</li> <li>7. James Slater - Pharmacy</li> <li>8. Doug Luther – Medical Director</li> <li>9. Tonya Kapka – Medical Director</li> <li>10. Jennifer Lind - JCC</li> <li>11. Julia Pirani – Strategic Business Initiatives</li> <li>12. Mimi Haley - CPMCO</li> <li>13. Alyssa Franzen – Dental</li> <li>14. Irma Kirk* – Operations</li> <li>15. Karin Villiarimo* - Claims, Payment Integrity, Enrollment</li> </ol>	<ol style="list-style-type: none"> <li>16. Nicole Tuite* – Customer Experience</li> <li>17. Robert Mcconville* – Metro</li> <li>18. Rodney Hicks* – Enterprise Project Management</li> <li>19. Nicole Merrithew – Network Relations</li> <li>20. Darin Brink – Clinical Operations</li> <li>21. Monica Martinez – General Counsel</li> <li>22. Angela Mitchell* – Value Based Contract</li> <li>23. Tony Jackson – Controller</li> <li>24. Chris Senz* – Medicare</li> <li>25. Tony Hedding – Finance</li> <li>26. David Russell* – Business Development and Integration</li> <li>27. Bethany Hollister – Business Development and Integration</li> <li>28. Community Impact – posted August 4, 2022</li> <li>29. Brand, Marketing and Communication – posted August 4, 2022</li> </ol>
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\* = External Hire

**Director Positions (47)**

<ol style="list-style-type: none"> <li>1. Elizabeth Wintczak – Behavioral Health</li> <li>2. Julia Jackson* – Behavioral Health</li> <li>3. Nina Marshall* – Behavioral Health</li> <li>4. Thomas Bialozor* – Behavioral Health</li> <li>5. James Fife* – Population Health</li> <li>6. Karissa Smith – Care Coordination</li> <li>7. Kristi Youngs – HCP</li> <li>8. Peter Shearer – IS Infrastructure and Ops</li> <li>9. Rajesh Meher* – IS Analytics</li> <li>10. Tony Aufenkamp* – IS Core Applications</li> </ol>	<ol style="list-style-type: none"> <li>17. Amy Griffin* - Compliance</li> <li>18. Janet Holland – Clinical Integration, JCC</li> <li>19. San Sunowen - Transportation</li> <li>20. Mae Pfeil – Clinical Integration</li> <li>21. Nancy Knopf – Community Health Partnership</li> <li>22. Alyssa Craigie* – Health System Integration</li> <li>23. Ifeoma Muoto* – Community Health Partnerships</li> <li>24. Jennifer Hawkins – Clinical Integration</li> </ol>	<ol style="list-style-type: none"> <li>31. Joseph Partridge – Business Continuity and Facilities</li> <li>32. Mara Kershaw* – Organizational Culture and Development</li> <li>33. Shawn DeCarlo – Community Benefit Program</li> <li>34. Adrian Radutui* – Financial Planning</li> <li>35. Steven Geidl* - Finance</li> <li>36. Kimberley Lee – Clinical Operations</li> <li>37. Anna Lynch – Medicare Network Performance</li> </ol>
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11. Dorothy Studebaker* – Customer Experience 12. George Marlton* – Procurement 13. Horishi Yoshimori – Financial Reporting 14. Resa Kee – Accounting 15. Shaunmarie Gutbezahl* – Brand, Marketing, and Engagement 16. Sherry Edwards - Dental	25. Terry Howell* – Value-Based Payments 26. Ly Nguyen – Provider Contracting 27. Amber Corbett – Pharmacy Operations 28. Kristen Benkstein – Pharmacy Clinical 29. Beth Sommers* – Network Relations and Innovation 30. Keshia Bigler* – Network Analytics	38. Jenna Corbly* - Medicare 39. Jane Speyer* - Quality Assurance – Operations 40. Shellie Holk – Quality of Care and Accreditation 41. Enterprise Project Management 42. BH SHIFT - Posted 5/6/2022 43. Provider Engagement - posted 5/27/2022 44. Provider Contracting - posted 5/27/2022 45. Medicare Stars – posted 5/13/2022 46. Payment Integrity – posted 4/7/2022 47. Community Health – posted 2/21/2022
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\* = External Hire

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2. Inquiry to Human Resources related to the Privacy Manager position and question as to why an Internal Audit Director position has not been created:

From: Andrea Sten <[StenA@careoregon.org](mailto:StenA@careoregon.org)>  
Sent: Friday, June 17, 2022 9:50 AM  
To: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Subject: Job Posting Question

Hi Robert, I hope you've been well!

Hey, I feel terrible. Bridgitte sent me a note a few weeks ago about your question about the Privacy Officer job level. It slipped in my inbox and I completely forgot to reach out to you. I am SO sorry!

The Privacy and Security Manager (Privacy Officer) role that's posted is one step below your current position, so there would be a decrease in pay if you went this route. The midpoint is roughly \$115K, rather than \$128K.

It's very common for employees to change jobs, and sometimes the pay increases, stays flat, or decreases. I totally get that employees don't want to go backward in pay. I've gone backward a few times. However, many people go that route for reasons that are just as important or more important than pay... things like having a new manager, a new work focus, managing people vs. not managing people, expanding knowledge, different hours, work/life balance, etc. Sometimes a step back in pay to focus on different work ends up expanding someone's marketability and opens more doors later for higher pay. It's totally a personal decision for everyone.

I hope this helps,  
Andrea

**Andrea Sten** | Pronouns: She/Her  
Compensation Manager

**From:** Robert Snoddy  
**Sent:** Friday, June 17, 2022 1:16 PM  
**To:** Andrea Sten <[StenA@careoregon.org](mailto:StenA@careoregon.org)>  
**Cc:** Bridgitte Ngo <[ngob@careoregon.org](mailto:ngob@careoregon.org)>  
**Subject:** RE: Job Posting Question

Hey Andrea!

Thanks for the information. Since the pay is less than I am currently making, I wish to withdraw my application for this position.

Any idea when an Internal Audit Director position will be created to go along with the 50 Director positions we have in the organization? Just asking as it is very 'odd' that a health insurance plan doesn't have this position. Any idea why an Internal Audit Director position hasn't been created yet?

Thanks and have a super weekend!!

**Robert Snoddy, CIA, CHC, CHPC**  
Manager, Audit  
Voice | 503-416-3677 | Fax | 503-416-8117  
[careoregon.org](http://careoregon.org)



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**From:** Andrea Sten <[StenA@careoregon.org](mailto:StenA@careoregon.org)>  
**Sent:** Friday, June 17, 2022 2:28 PM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Cc:** Bridgitte Ngo <[ngob@careoregon.org](mailto:ngob@careoregon.org)>  
**Subject:** RE: Job Posting Question

Hi Robert, thanks for letting us know.

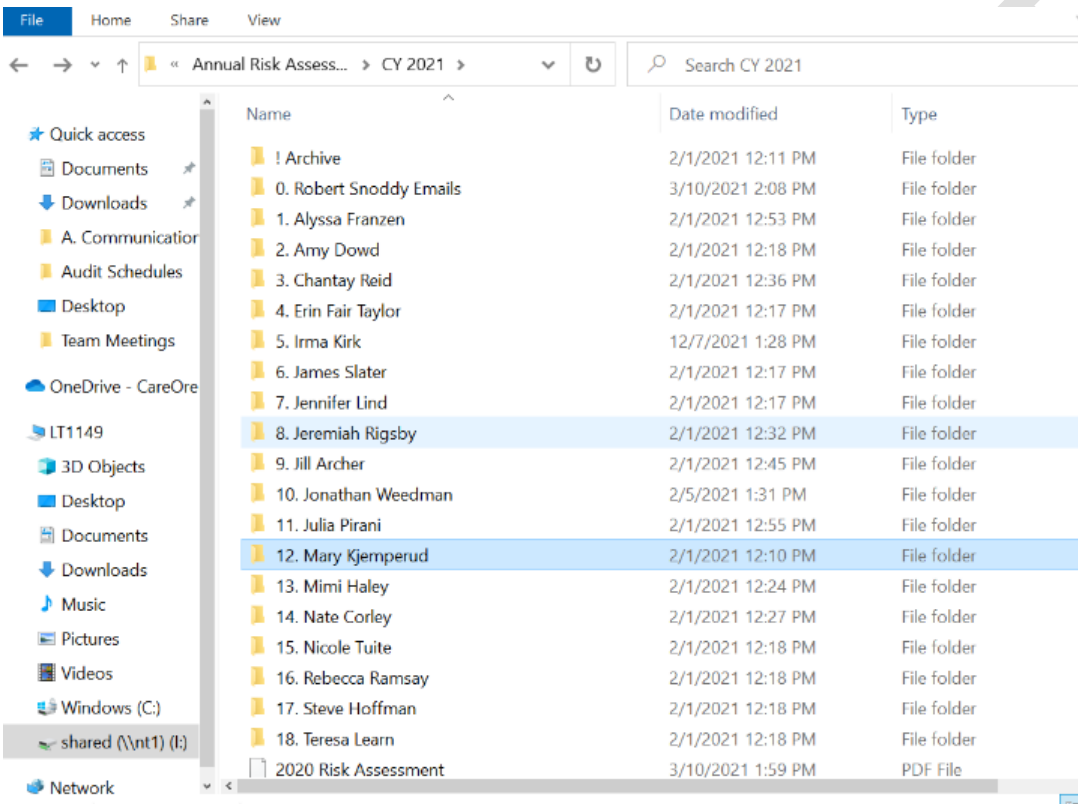
Unfortunately, I don't have insights on audit staffing discussions or needs. I've more so been pulled in on the compliance side recently. That would definitely be an appropriate question for Chris. Have you checked with him? We have many strong manager roles that are not directors, so there are situations like this across the organization (it's not isolated).

I hope you have great weekend too!  
Andrea

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3. On August 3, 2021 during a group meeting (*attendees: Mr. Zorn, Steve Hoffman, Yuliya Edwards and myself*), Mr. Zorn indicated that the 2022 budget included funds for Internal Audit employee promotions. The assumption was that there would be Director positions created for both Internal Audit and Compliance.

Additionally, during this meeting, Mr. Zorn made the comment that senior management was not given the opportunity to have input or review the Risk Assessment process. This is a false statement. I informed Mr. Zorn that he should hear from the Internal Audit Team before making these assumptions as senior management was and has been actively involved in the risk assessment process as shown below. As evidence, all personnel listed below were requested to provide input for the Risk Assessment and development of the 2021 Internal Audit schedule. Moreover, Steve Hoffman and I met with Teresa Learn, CFO on February 9, 2021 (3:00 PM); Amy Dowd, COO on February 8, 2021 (9:30 AM); Erin Fair Taylor, Chief Strategic Officer on February 9, 2021 (1630), and Amit Shah, CMO on February 20, 2021 (1:30 PM) to discuss the Risk Assessment and related Audit Schedule for 2021.

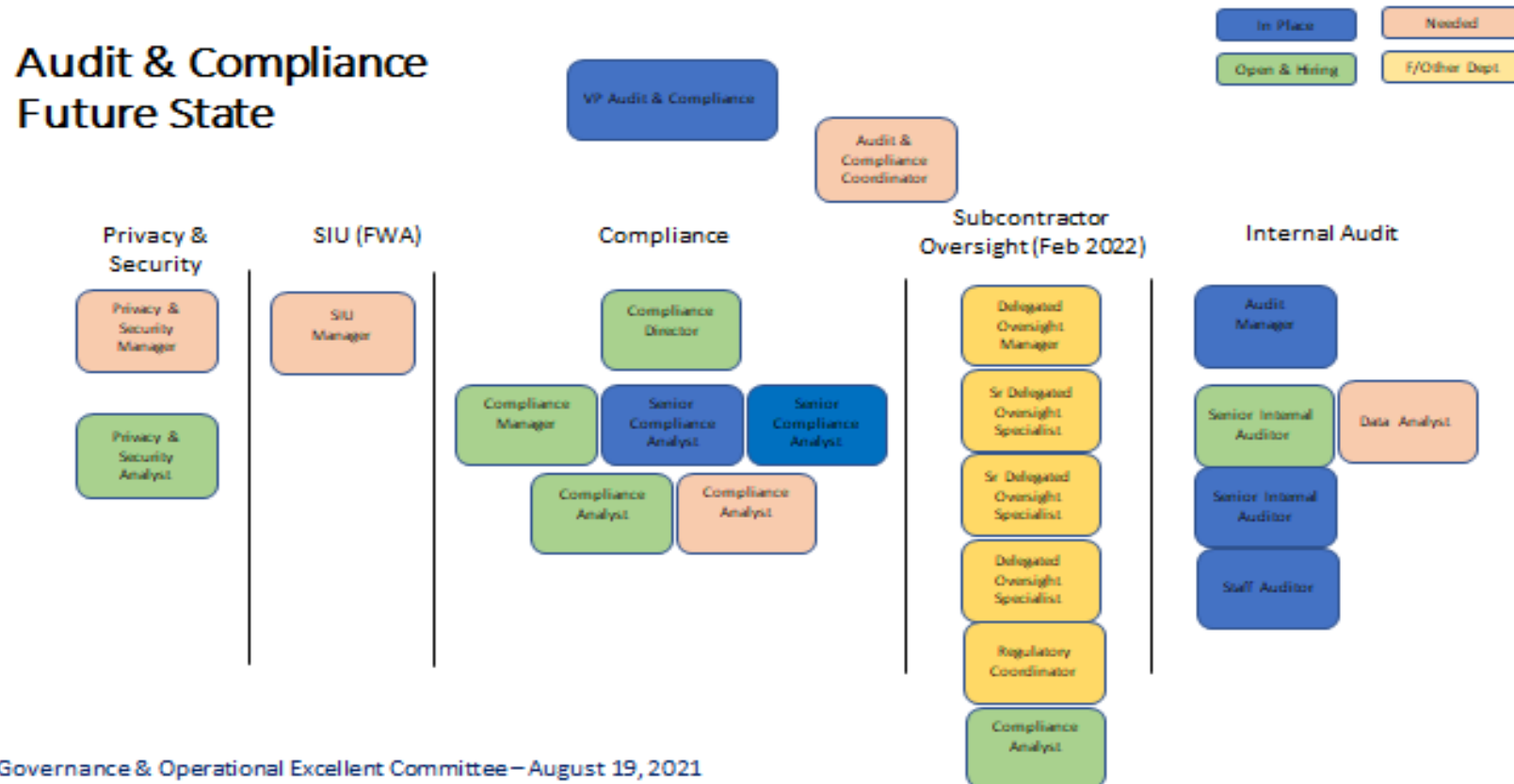


Reference: Communication Folder for 2021 Calendar Year Risk Assessment

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4. In a one-on-one MS Teams meeting with Mr. Zorn on August 6, 2021, I had a list of questions to discuss with him, including:
- What is the vision and strategy of the Internal Audit department;
  - What are your expectations so I know how to succeed in my role; and
  - What is the status of the three (3) draft internal audit reports submitted to him for review and approval.

However, I did not get the opportunity to ask these questions. Instead, Mr. Zorn showed me a MS PowerPoint presentation slide (below) with the 'Future State' of the Internal Audit, Compliance, Delegation Oversight, and Special Investigation Unit departments. Shown on the slide of the 'Future State' state of the Audit and Compliance department, a Compliance Director position was to be created; however, an Internal Audit Director position was not indicated.



Governance & Operational Excellent Committee – August 19, 2021

**Reference:** Slides from the Governance & Operational Excellence Committee, August 19, 2021

I inquired why there was not an Internal Audit Director position and why this position has not yet been created. Mr. Zorn responded, 'We don't need one'. As noted in my Formal Complaint letter (dated July 7, 2021) to James Mason, Chief Equity, Diversity, and Inclusion Officer regarding inequality in hiring and promotions, in an industry where compliance with federal and state regulations is a high priority, it doesn't seem like a good business decision to not have an Internal Audit Director position.

Moreover, other slides shown to me by Mr. Zorn during this meeting included responses from senior management regarding the Internal Audit function and included statements such as:

- CareOregon personnel felt 'disrespected', threatened, and treated unprofessionally.
- That Internal Audits approach is a 'Gotcha', 'we are right/you are wrong approach.
- There is a high degree of mistrust of the Internal Audit department.
- Audit personnel communicate without precision, are dismissive, and unwilling to accept responsibilities.
- Internal Audit personnel have a low tolerance for listening.
- Personnel feel that Internal Audits opinions are dated, lack business acumen, and are not aligned with CareOregon.

**(Note:** *These statements were made without Mr. Zorn reaching out to the Internal Audit Team for our side of the story and as such, these statements are wild speculations that are not founded in truth).*

## Organizational Feedback from Interviews



Reference: *Slides from the Governance & Operational Excellence Committee, August 19, 2021*

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## **ISSUE C: CAREOREGON'S FAILURE TO RESPOND TO MY JULY 7, 2021 INTERNAL COMPLAINT**

I have met with or had discussions with representatives from the Human Resources department on six (6) separate occasions<sup>20</sup> to discuss career advancement; however, no beneficial responses were provided, and I still remain at the Manager level. Additionally, on July 7, 2021 I submitted a Formal Complaint<sup>21</sup> to James Mason, Chief Equity, Diversity, and Inclusion Officer, regarding inequality and unfair treatment I have experienced in career advancement and professional growth opportunities within CareOregon. As stated in this Formal Complaint, internal personnel of CareOregon and affiliated entities (CareOregon Advantage, Health Share of Oregon Coordinated Care Organization (CCO), Jackson Care Connect CCO, and Columbia Pacific CCO) and external job candidates are given preferential consideration for positions which I have applied for and am qualified to perform. Receipt of the Formal Complaint was acknowledged on this same day by James Mason, Chief Equity, Diversity, and Inclusion Officer, however, I have not yet heard back from him nor received results of the investigation, as requested.

---

From: James Mason <[masonj@careoregon.org](mailto:masonj@careoregon.org)>  
Sent: Wednesday, July 7, 2021 12:20 PM  
To: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Subject: RE: Formal Complaint - Robert Snoddy, July 2021

Mr. Snody,

I received your formal complaint and will begin the process of having it reviewed. Not sure about the process as I am new, however, I guarantee my due diligence in pursuing this seriously and reacting in a prompt and professional manner. I ask for your patience as we do our work, and feel assured you will continue to perform in your usual professional manner. Appreciate the courage it takes to file a formal complaint, and I will do all I can to bring this to a timely and hopefully amiable conclusion.

Respectfully,  
James

James L. Mason, Ph.D. | Chief EDI and HR Officer | **Pronouns: he/him/his**  
(503) 754-1451 cell  
[careoregon.org](http://careoregon.org)



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<sup>20</sup> September 22, 2017; October 30, 2019; September 11, 2019; September 30, 2019; June 4, 2021; June 17, 2022

<sup>21</sup> Formal Complaint – Robert Snoddy, July 2021, submitted July 7, 2021

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From: Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
Sent: Wednesday, July 7, 2021 12:05 PM  
To: James Mason <[masonj@careoregon.org](mailto:masonj@careoregon.org)>  
Subject: Formal Complaint - Robert Snoddy, July 2021

Good afternoon Dr. Mason,

I would like to submit a formal complaint letter. All details are included in the attached letter.

I would be happy to meet with you to address any questions or provide clarification for any of your concerns.

Looking forward to your reply.

Thank you,

Robert Snoddy, CIA, CHC, CHPC  
Manager, Audit  
Voice | 503-416-3677 | Fax | 503-416-8117  
[careoregon.org](http://careoregon.org)



 Please consider your environmental responsibility before printing this e-mail

Moreover, on November 18, 2021 and July 24, 2022, I asked Mr. Zorn to schedule a meeting with the VP of HR to discuss career opportunities and advancement within CareOregon. Both times he 'promised' that he would arrange and schedule these meetings on these same days; however, these meetings were never scheduled.

On August 16, 2021, my Internal Audit team acted proactively and scheduled a meeting with the Senior Organizational Development Specialist to discuss ideas on how to best communicate with Mr. Zorn and let him know that we feel he does not value our input or years of experience of conducting internal audits and compliance related functions. During the meeting, one of my team members stated that she feels like a 'deflated balloon' due to the comments and criticism made by Mr. Zorn. There were three (3) options presented to us at this meeting on how to best try and work with Mr. Zorn:

- Live with it and accept the change;
- Change it – take a stand; or
- Leave.

These three (3) options provided do not help the organization in retaining talent as identified in CareOregon's strategic plan<sup>22</sup> or improving operational functionality.

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<sup>22</sup> CareOregon 2022 – 2025 Strategic Plan

**ISSUE D: RECENT DISCIPLINARY ACTION AGAINST ME FOR PERFORMING MY CORE JOB FUNCTIONS OF IDENTIFYING PERFORMANCE SHORTCOMINGS AND LEGAL NONCOMPLIANCE**

On August 11, 2022 I was issued a 'First Performance Conversation Form' by Mr. Zorn for a series of non-specific "offenses" against SPIRITED Values, generally for expressing both my own opinion on matters *after having been invited to do so*, and again for pointing out actual shortcomings and potential legal noncompliance, incorrectly identified as "job performance."

On August 18, 2022 I submitted a rebuttal to the 'First Performance Conversation Form'. As stated in my rebuttal, the comments made by Mr. Zorn on Thursday, August 11, 2022 when you presented the First Performance Conversation and where you stated, *'I think part of these issues really goes back to you feeling resentful that you were passed over for a Director.....you were passed over my job* were unprofessional and considered as an attacking type of statement. I responded that 'an Internal Audit Director position was never created; however, we have 47 other Director positions and it doesn't make any sense why we do not have and Internal Audit Director in a highly regulated industry'. Your response that *'We may have an Internal Audit Director position soon. I'm not going to give you any more specifics'* was interpreted by me as this position may be forthcoming, but it would not be offered to me (even though I am more than qualified for the position) as another example of a comment that was unprofessional and an attacking type of statement.

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## **Examples of Emails and Communication from Employees who Appreciate my Knowledge to their Questions**

I do get respect and my input is appreciated from internal employees, as indicated below in recent correspondence directed to me due to my knowledge, experience, and skills related to health insurance audit, HIPAA, Compliance and Fraud, Waste, and Abuse. Additionally, I earned a 'Super ACE Award' in 2019 for exemplary performance. Additional correspondence indicating appreciation of services provided by myself and my Team are available upon request.

### **Example 1:**

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**From:** Katalini Tukuafu <[tukuafuk@careoregon.org](mailto:tukuafuk@careoregon.org)>  
**Sent:** Tuesday, April 12, 2022 1:26 PM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>; Stacey Ross <[rosss@careoregon.org](mailto:rosss@careoregon.org)>  
**Cc:** Sandy Hernandez <[hernandezs@careoregon.org](mailto:hernandezs@careoregon.org)>  
**Subject:** Compliance Email

Hello,  
Who do I report this email I sent unsecure in error, there is member info that was in the email.

Thank you,

Katalini Tukuafu | Claims Lead | 503-416-4922 | [tukuafuk@careoregon.org](mailto:tukuafuk@careoregon.org)



Sent: Tuesday, April 12, 2022 2:06 PM  
To: Katalini Tukuafu <tukuafuk@careoregon.org>; #ComplianceTeam <ComplianceTeam@careoregon.org>  
Cc: Sandy Hernandez <hernandezs@careoregon.org>; Stacey Ross <rosss@careoregon.org>  
Subject: FW: Compliance Email

Greetings Katalini!! Hey, Hey, Hey, Hey Sandy!!!

Thanks for reporting Katalini! I'm copying in the Compliance Team for their action since this falls under their purview. However, I'll provide the steps I would take in my review of this report along with my comments understanding that the Compliance Team can perform actions they deem necessary. I'm just providing some background....

1. Again Katalini, thanks for reporting!!
2. My understanding is that CareOregon has IronPort software in place that reviews emails prior to sending for identifiers (e.g. – SSN, sequence of Medicaid numbers alpha/numeric, sequence of Medicare numbers alpha/numeric, etc.) and encrypts the message and attachments. In the past, when these type of emails were sent and did not include the word 'Secure' in the subject line, an email response would be sent back to the employee indicating that the email message (and attachment) possibly contained Protected Health Information (PHI) and was sent in a secure method which was caught by the IronPort software. A copy of the email would also be forward to the Compliance Officer for education and remedial training for the employee on Friday afternoons, fortunately, that is no longer happening.
3. In my opinion, there would be a very remote risk that the data would be intercepted while in transit to the designated parties.
4. Compliance Team – Consider reaching out to the IS Security Manager and have them verify that the email was encrypted and sent in a secure method. Email is attached. This would also test the effectiveness of the IronPort Software.
5. Respond back to Katalini and Karen the results.

Stay safe, my Friends!!

Robert  
Robert Snoddy, CIA, CHC, CHPC  
Manager, Audit  
Voice | 503-416-3677 | Fax | 503-416-8117  
[careoregon.org](http://careoregon.org)



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## Example 2:

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**From:** Keith Hagan <[hagank@careoregon.org](mailto:hagank@careoregon.org)>  
**Sent:** Tuesday, March 29, 2022 9:19 AM  
**To:** Amy Griffin <[griffina@careoregon.org](mailto:griffina@careoregon.org)>; Jessica Saucedo <[saucedaj@careoregon.org](mailto:saucedaj@careoregon.org)>; Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** RE: HIPAA compliant Member Voice Mails

Morning,

Samantha reached out to me this morning via Teams "I would like to talk to Robert Snoddy please." I advised to check Roberts calendar for availability.

This is my revised response for Ethics Point/Navex based on my conversation with Amy.

*"The CareOregon legal Department reviewed the rules for Health Plans leaving member voice mails that are HIPAA compliant and identified that we are in compliance with the HIPAA rules. Compliance will be following up with the clinical operations department to strengthen the controls. This will be our final response unless you have additional questions. Thank you."*

Thanks all,  
Keith



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**From:** Keith Hagan <[hagank@careoregon.org](mailto:hagank@careoregon.org)>  
**Sent:** Friday, March 18, 2022 8:18 AM  
**To:** Amy Griffin <[griffina@careoregon.org](mailto:griffina@careoregon.org)>  
**Cc:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>; Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
**Subject:** RE: HIPAA Employee follow up

Good Morning,

Wonderful timing Amy. Chris said he followed up with Samantha before I reached out. Can we find a couple today to chat about this, the employee is now reaching out to Robert via linked in.

Samantha responded in Ethics Point 3/17/22 and I think any interaction is getting a bit concerning for me and think it might be time to bring in HR so we are appropriately covered. The updated report is attached.

My Communication with the employee since the EP report:

- I reached out to the employee via teams as an internal connection.
  - Her supervisor identified she is on leave and HR would need to be involved because of the leave not the report to us.
- I responded in Ethics Point, our External communication tool for folks reporting concerns anonymously, so I was acknowledging the reports submission.
  - Samantha responded 3/17/22 the communication is below.

Mar 15, 2022, 8:11 AM posted by Keith Hagan

Question: Hi Samantha,

We received your HIPAA concern filed via ethics point and I want to make sure I understand the concern. Please contact Keith Hagan [Hagank@CareOregon.org](mailto:Hagank@CareOregon.org) or 503-416-5784.

Looking forward to understanding this concern better.

Thank you,

Keith Hagan

3/17/2022 posted by Reporter

Answer: I have already emailed #compliance from my work computer and received a response from Keith. He told me that it falls within reason. I am now sending a message to Robert Snoddy (Audit and Medicare Compliance) regarding this issue via LinkedIn since I am unable to use my work computer right now.

Thank you,

Keith

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### **Example 3:**

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**From:** Gena Peters <[petersg@careoregon.org](mailto:petersg@careoregon.org)>  
**Sent:** Thursday, February 3, 2022 3:30 PM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Subject:** question for the expert :)

Hi Robert,

You will Always be my HIPAA go-to person 😊

Sandy in Risk is wondering if it is within HIPAA guidelines for my team to access charts from various clinics' remote systems and give them to her to give to Optum charts to do the HCC coding on.

If Optum has a BAA, shouldn't that cover the HIPAA situation? Since it is being done for Quality/Risk reasons.

Your thoughts and advice on this are very welcome 😊

Gena

**Gena Peters** | Pronouns: She/Her  
HEDIS Supervisor | 503-416-5932 | [careoregon.org](http://careoregon.org)



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**From:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>  
**Sent:** Friday, February 4, 2022 8:53 AM  
**To:** Gena Peters <[petersg@careoregon.org](mailto:petersg@careoregon.org)>  
**Cc:** #ComplianceTeam <[ComplianceTeam@careoregon.org](mailto:ComplianceTeam@careoregon.org)>  
**Subject:** RE: question for the expert :)

Gena!!!! Great to hear from you!!!

I'm going to forward your question onto the Compliance team for their research and response. An expert from the Compliance department will address your question.

Have a super weekend!!!

Robert

**From:** Keith Hagan <[hagank@careoregon.org](mailto:hagank@careoregon.org)>  
**Sent:** Friday, February 4, 2022 9:01 AM  
**To:** Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>; Gena Peters <[petersg@careoregon.org](mailto:petersg@careoregon.org)>; Sandy Stahle <[StahleS@careoregon.org](mailto:StahleS@careoregon.org)>  
**Cc:** #ComplianceTeam <[ComplianceTeam@careoregon.org](mailto:ComplianceTeam@careoregon.org)>  
**Subject:** RE: question for the expert :)

Hi Gena,

We addressed this with Sandy last week. Attached is the communication around this, please let us know if you have any questions.

Please let us know if you have any questions.

Thank you,  
Keith

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**From:** Gena Peters <[petersg@careoregon.org](mailto:petersg@careoregon.org)>  
**Sent:** Friday, February 4, 2022 10:20 AM  
**To:** Keith Hagan <[hagank@careoregon.org](mailto:hagank@careoregon.org)>; Robert Snoddy <[snoddyr@careoregon.org](mailto:snoddyr@careoregon.org)>; Sandy Stahle <[StahleS@careoregon.org](mailto:StahleS@careoregon.org)>  
**Cc:** #ComplianceTeam <[ComplianceTeam@careoregon.org](mailto:ComplianceTeam@careoregon.org)>  
**Subject:** RE: question for the expert :)

Hi Keith and All,

Happy Friday 😊

Yep, I know you addressed this last week. I decided to reach out to the person with a lot more years of experience and understanding. Robert has always been my go-to person for anything HIPAA related, and remains the expert in my mind. I would love to hear his take on this 😊

Gena

From: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Sent: Friday, February 4, 2022 2:52 PM  
To: Gena Peters <[petersg@careoregon.org](mailto:petersg@careoregon.org)>  
Subject: RE: question for the expert :)

Answer shopping? You can certainly ask who you want. But I think sometimes the way you do that could be taken the wrong way by a reader, Keith or Robert.



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From: Gena Peters <[petersg@careoregon.org](mailto:petersg@careoregon.org)>  
Sent: Tuesday, February 8, 2022 8:53 AM  
To: Chris Zorn <[zornc@careoregon.org](mailto:zornc@careoregon.org)>  
Subject: RE: question for the expert :)

Hi Chris,

I have been trying to figure out what you mean. Trying even to apply the ladder of inference... I just don't know. 🙄

I don't play politics, I ask the people I know and trust, that's it.

Anyway, I hope you are having a better day 😊

Gena

Gena Peters | Pronouns: She/Her  
HEDIS Supervisor | 503-416-5932 | [careoregon.org](http://careoregon.org)



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