Independent External Audit: Get Covered Illinois, State of Illinois

July 1, 2024, to June 30, 2025

Audit Findings Report

Independent External Audit: 2025 Findings Report

TO: CCIIO STATE EXCHANGE GROUP

FROM: BDMP Assurance, LLP (BerryDunn)

DATE: June 26, 2026

SUBJECT: AUDIT FINDINGS REPORT FOR

AUDIT PERIOD: 7/1/2024 – 6/30/2025

I. Executive Summary

PURPOSE:

The purpose of this independent external audit is to assist the State of Illinois in determining whether the Get Covered Illinois Exchange (the Exchange), the Illinois State-Based Exchange on the Federal Platform (SBE-FP), is in compliance with the programmatic requirements set forth by the Centers for Medicare & Medicaid Services (CMS) during the audit period.

Name of SBE-FP: Get Covered Illinois
State of SBE-FP: Illinois
Name of Auditing Firm: BerryDunn

Our responsibility was to perform a financial and programmatic audit to report on GCI's compliance with Title 45, Code of Federal Regulations, Part 155 (45 CFR 155) as described in the CMS memo dated June 18, 2014, Frequently Asked Questions about the Annual Independent External Audit of SBMs. The Program Integrity Rule Part II ("PI, Reg."), 45 CFR 155.1200 (c), states, "The State Exchange must engage an independent qualified auditing entity which follows U.S. generally accepted governmental auditing standards (U.S. GAGAS) to perform an annual independent external programmatic audit and must make such information available to the United States (U.S.) Department of Health and Human Services for review."

SCOPE:

The scope of this engagement included an examination of GCI's compliance with the programmatic requirements under 45 CFR 155, Subparts D, E, and K for the 12-month period July 1, 2024, through June 30, 2025. We conducted our examination in accordance with U.S. generally accepted auditing standards and the standards applicable to financial audits contained in Government Auditing Standards, issued by the Comptroller General of the United States. We completed an examination of GCI's compliance with the applicable programmatic requirements under 45 CFR 155 and issued our reports dated June 26, 2026.

We also performed an audit of its financial statements for the year ended June 30, 2025, and issued our report dated June 24, 2026.

Due to the State's SBE-FP status during the audit period, eligibility and enrollment functions were performed by the federal platform. Accordingly, we did not select or test eligibility and enrollment transactions for compliance with requirements related to eligibility determination, data verification, or Qualified Health Plan (QHP) enrollment, as these functions are administered by CMS.

METHODOLOGY:

Audit Firm Background:

BerryDunn is a national consulting and certified public accounting firm with multiple practice groups dedicated to serving state and local government agencies. BerryDunn was formed in 1974 and has experienced sustained growth throughout its 52-year history. Today, BerryDunn employs 900+ personnel with headquarters in Portland, Maine—and office locations in Arizona, Connecticut, Hawaii, Massachusetts, New Hampshire, West Virginia, and Puerto Rico. The firm has experienced professionals who provide a full range of services, including information technology (IT) consulting; management consulting; and audit, accounting, and tax services. Those services include conducting Financial and/or Programmatic audits of multiple State-Based Exchanges. We also have completed audits in accordance with Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance, previously referred to as Office of Management and Budget (OMB) Circular A 133) for several sizable healthcare organizations, many of which receive U.S. Department of Health and Human Services federal grants or funding. In addition, we provide audit services for higher education, social service, and economic development organizations, as well as other entities that receive federal grants and are subject to the Uniform Guidance.

Financial Statement Audit:

We have audited, in accordance with U.S. generally accepted auditing standards (U.S. GAAS) and the standards applicable to financial audits contained in Government Auditing Standards issued by the Comptroller General of the United States, the financial statements of GCI, for the year ended June 30, 2025, and related notes to the statements, and have issued a report thereon dated June 24, 2026.

Programmatic Audit:

We have examined GCI's compliance with the programmatic requirements described in 45 CFR 155 for the year ended June 30, 2025, and have issued a report thereon dated June 26, 2026.

Summary of Programmatic Audit Procedures:

Our audit consisted of specific procedures and objectives to evaluate instances of noncompliance and to test ’s compliance with certain subparts of 45 CFR 155. BerryDunn examined compliance with the requirements under 45 CFR 155, in the following programmatic areas:

- Eligibility Determinations (Subpart D)
- Enrollment Functions (Subpart E)
- Certification of QHPs (Subpart K)

We reviewed the processes and procedures under 45 CFR 155, in the following programmatic areas in order to determine whether they followed the requirements of the ACA:

- Assisters, Navigators, Certified Application Counselors, and Brokers
- Compliance and Program Integrity
- Contact Center
- Eligibility and Enrollment Processes and Procedures
- Privacy and Security
- QHP Certification

We reviewed the following documentation, which was obtained directly from, or located on either the website or the CMS website:

- GCI Conditional Approval Letter
- QHP:
    - Certification and Licensing Process Guide PY25
    - Department of Insurance Policy Manual
    - DOI Certification Bulletin to Issuers
    - DOI Policy Manual
    - DOI Review Requirements Checklist
    - GCI Issuer Agreement
    - Illinois Navigator Program Sample PY2025
    - QDP Checklist for SADP 2024
    - QHP Certification Process
- Privacy and Security
    - HFS and DOI Intergovernmental Agreement and First Amendment

To understand management and staff responsibilities and processes as they relate to compliance with 45 CFR § 155, we interviewed the following GCI staff:

- Director, Plan Management and Carrier Relations
- Director, Partner Relations and Outreach
- Deputy Director, Business Solutions and Program Management
- Deputy Director, Marketplace Compliance and Program Integrity
- Manager, Marketplace Training and Partner Certification

Confidential Information Omitted

N/A

II. Programmatic Audit Findings

No audit findings for FY25

Programmatic Auditor’s Opinion

Unqualified

ADDITIONAL COMMENTS

N/A

III. Recommendations

N/A

IV. Financial Statement Auditor's Opinion

We have issued an Independent Auditor's Report on the financial statements for the year ended June 30, 2025, reflecting the following type of opinion:

Unqualified

V. Conclusion

Based on a review of the documentation required for this report, in our opinion, GCI complied with the requirements of 45 CFR 155, Subparts D, E, and K during the year ended June 30, 2025, in all material respects.

SIGNATURE OF AUDIT FIRM:

BDMP Assurance, LLP

COMPLETION DATE OF AUDIT:

FINDINGS REPORT: June 26, 2026

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Illinois Health Insurance Marketplace (dba Get Covered Illinois)

PROGRAMMATIC COMPLIANCE REPORT

Year Ended June 30, 2025

With Independent Accountant's Report

Independent Accountant's Report

Get Covered Illinois

Director and Management of Get Covered Illinois

Report on Compliance

We have examined the Get Covered Illinois Exchange ("the Exchange"), a function within the Illinois Department of Insurance, State of Illinois, assertion that the Exchange operated in compliance with the requirements in Title 45, Code of Federal Regulations, Part 155 (45 CFR 155), Subparts D, E, and K during the fiscal year July 1, 2024, to June 30, 2025. The Exchange's management is responsible for its assertion related to the requirements of the subparts for which the Exchange retains responsibility and oversight, excluding functions performed by the Federally Facilitated Platform (FFP). Our responsibility is to express an opinion on the Exchange's assertion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the Exchange's assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about the Exchange's assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the Exchange's assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Our examination does not provide a legal determination on the Exchange's compliance with specified requirements.

In our opinion, the Exchange's assertion that it complied with the requirements of 45 CFR 155, Subparts D, E, and K described above during the year ended June 30, 2025, is fairly stated, in all material respects.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated June 26, 2026, on our consideration of the Exchange's internal control over compliance with certain provisions of laws, regulations, contracts, and grant agreements. The purpose of that report is solely to describe the scope of our testing of internal control over compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Exchange's internal control over compliance. That report is an integral part of an examination performed in accordance with *Government Auditing Standards* in considering the Exchange's internal control over compliance.

Intended Use

This report is intended to describe the scope of our examination of compliance and the results of the examination based on attestation standards established by the AICPA and *Government Auditing Standards* and it is not suitable for any other purpose.

BDMP Assurance, LLP

Portland, Maine

June 26, 2026

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Independent Accountant's Report on Internal Control Over Compliance With Requirements of Title 45, Part 155, Subparts D, E, and K of The Code of Federal Regulations

Get Covered Illinois

Director and Management of Get Covered Illinois

We have examined, in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the assertion that the Exchange operated in compliance with the requirements in Title 45, Code of Federal Regulations, Part 155 (45 CFR 155), Subparts D, E, and K during the fiscal year July 1, 2024, to June 30, 2025. We have issued our report on the Exchange's assertion of compliance with the above stated requirements dated June 26, 2026, which contained an unmodified opinion.

Management of the Exchange is responsible for establishing and maintaining effective internal control over compliance with the compliance requirements described in 45 CFR 155, Subparts D, E, and K. In planning and performing our examination of the Exchange's assertion of compliance, we considered the Exchange's internal control over compliance with the requirements described above as a basis for designing examination procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance with those requirements, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Exchange's internal control over compliance.

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the second paragraph and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses might exist that have not been identified.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the examination engagement.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of *Government Auditing Standards*. Accordingly, this report is not suitable for any other purpose.

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BDMP Assurance, LLP

Portland, Maine

June 26, 2026