



Protecting, maintaining and improving the health of all Minnesotans

January 15, 2010

Tim Schultz
Metropolitan Health Plan
400 South Fourth Street, Suite 201
Minneapolis, MN 55415

Dear Mr. Schultz:

Enclosed please find a copy of original Examination Report for Metropolitan Health Plan as of December 31, 2008, as prepared by the Minnesota Department of Commerce.

In accordance with Minnesota Statutes, § 62D.14, a copy of the Examination Report is also to be delivered to each member of the Board of Directors and executed affidavits should be forwarded to us for each Director.

A copy of an illustrated affidavit is enclosed for your information.

If you have any questions or wish to discuss the Examination Report further, please feel free to contact Jacqueline L. Gardner at 651-297-7030.

Sincerely,

A handwritten signature in black ink, appearing to read "Sanne Magnan", is written over the typed name.

Sanne Magnan, M.D., Ph.D.
Commissioner of Health

Enc.

cc: Margie Pinedo, Minnesota Department of Commerce

AFFIDAVIT

STATE OF _____)
)
COUNTY OF _____)

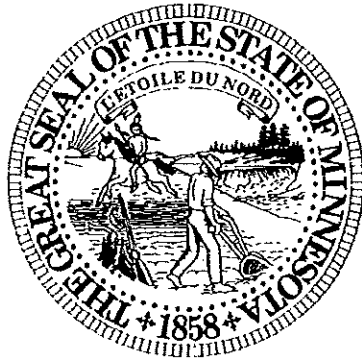
_____, being first duly sworn on oath, deposes and states that:

1. I am a member of the Board of Directors of Metropolitan Health Plan, a Minnesota Corporation with its main home office 400 South Fourth Street, Suite 201, Minneapolis, Minnesota 55415.

2. I have received a copy of the State of Minnesota, Department of Commerce Examination Report for Metropolitan Health Plan as of December 31, 2008 and related orders as adopted by Sanne Magnan, Commissioner of Health.

Subscribed and sworn to, before me,
this ____ day of _____, 2010.

Notary Public/Witness



**STATE OF MINNESOTA
DEPARTMENT OF HEALTH
SAINT PAUL, MINNESOTA
REPORT OF EXAMINATION
OF
METROPOLITAN HEALTH PLAN
MINNEAPOLIS, MINNESOTA
NAIC # 52627
AS OF
DECEMBER 31, 2008**



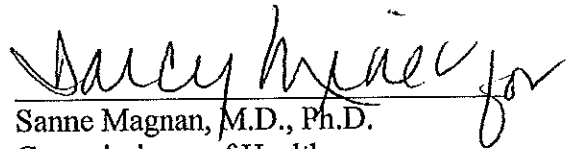
Protecting, maintaining and improving the health of all Minnesotans

The attached report of examination made of the condition and affairs as of December 31, 2008 of:

METROPOLITAN HEALTH PLAN
Minneapolis, Minnesota

was recently completed by duly qualified examiners of the State of Minnesota.

Due consideration has been given to the comments of the examiners regarding the operations of Metropolitan Health Plan and its financial condition, as reflected in this report. This report is hereby, as of this date, approved, adopted, filed and made an official record of this Department.


Nancy Magnan, M.D., Ph.D.
Commissioner of Health

Dated: _____

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Protecting, maintaining and improving the health of all Minnesotans

January 15, 2010

The Honorable Sanne Magnan
Commissioner of Health
State of Minnesota
Department of Health
85 7th Place East, Suite 400
St. Paul, Minnesota 55101

The Honorable Glenn Wilson
Commissioner of Commerce
State of Minnesota
Department of Commerce
85 7th Place East, Suite 500
St. Paul, Minnesota 55101

Dear Honorable Commissioners:

In compliance with your instructions and pursuant to statutory provisions, an association examination has been made of the affairs and financial condition of

METROPOLITAN HEALTH PLAN

The home office of Metropolitan Health Plan (hereinafter referred to as MHP) is located at 400 South 4th Street, Suite 201, Minneapolis, Minnesota, 55415. MHP's telephone number is (612) 543-3397.

The report of examination is respectfully submitted.

SCOPE OF EXAMINATION

The examination was a comprehensive examination, conducted by the Minnesota Department of Commerce, observing the guidelines and procedures in the NAIC Examiners' Handbook 2006 (hereinafter known as "the Financial Examiners' Handbook"). The Department of Commerce Examination Order 08-006 directed the examination to include a determination of the financial condition of MHP and a general review of its corporate affairs and insurance operations to determine compliance with Minnesota statutes.

This examination included a review of MHP's systems and internal control environment and an assessment of its risk exposure level and the adequacy of its current and planned surplus to support future operations.

The examination covered the period January 1, 2005 through December 31, 2008, including any material transactions and/or events occurring subsequent to the examination date and noted during the course of this examination. The work papers of MHP's designated certified public accountant, for the audit year 2008, were reviewed and copies included as part of the examination files where utilized.

Risk Assessment

The examination was conducted as a risk-focused examination. Information about MHP's organizational structure, business approach, and control environment were utilized to develop the examination approach that would be most appropriate for MHP. MHP's risks and management activities were evaluated based upon the NAIC's nine branded risk categories. The categories below represent a measure of the risk areas judgmentally evaluated by the examiners to determine MHP's exposure to prospective risk that could potentially result in hazardous financial condition. The Control Evaluation Level, as indicated in the table below, is defined in the Financial Condition Examiner's Handbook as:

- Strong Risk Management - Management effectively identifies and controls all material types of risk posed by the relevant activity.
- Moderate Risk Management – The insurer's risk management practices, although largely effective, may be lacking in some modest degree.
- Weak Risk Management – Risk management processes that are lacking in important ways and therefore, are a cause for above normal supervisory attention.

Category	<u>Risk Definition</u>	<u>Control Evaluation Level</u>	<u>Observation</u>
Pricing/ Underwriting	Pricing and underwriting practices are inadequate to provide for risks assumed.	Adequate	Pricing/Underwriting risk exposure is limited due to the type of risk underwritten by MHP. However, MHP is exposed to the risk of the government premium received not being sufficient to cover underwriting costs.
Reserving	Actual losses or other contractual payments reflected in reported reserves or other liabilities will be greater than estimated.	Strong	MHP has controls in place to reasonably ensure that claim liabilities are established at an adequate level. Redundancies are built into established loss liabilities.
Operational	Operational problems such as inadequate information systems, breaches in internal controls, fraud or unforeseen catastrophes will result in unexpected losses.	Adequate	MHP has residual operational risk exposure due to lack of a formalized management oversight information reporting package and an incomplete and untested business interruption plan.
Strategic	Inability to implement appropriate business plans, to make decisions, to allocate resources or to adapt to changes in the business environment will adversely affect competitive position and financial condition.	Adequate	MHP has not completed upgrading its strategic planning and risk assessment programs. MHP does not have a formal succession plan for management and key operating personnel.
Credit	Amounts actually collected or collectible are less than	Strong	No material credit related control deficiencies were

	those contractually due.		noted. Most of MHP's credit related assets are with government agencies or affiliated entities.
Market	Movement in market rates or prices such as interest rates, foreign exchange rates or equity prices adversely affect the reported and/or market value of investments.	Strong	MHP's market risk exposure is minimal. Its invested assets are in a County administered short-term bond investment pool
Liquidity	Inability to meet contractual obligations as they become due because of an inability to liquidate assets or obtain adequate funding without incurring unacceptable losses.	Strong	MHP invested assets are maintained in a county administered investment pool. Hennepin County guarantees the Company's statutory surplus requirements.
Legal	Non-conformance with laws, rules, regulations, prescribed practices or ethical standards in any jurisdiction in which the entity operates will result in a disruption in business and financial loss.	Adequate	No material legal related control deficiencies were noted. MHP has residual legal political risk from potential statutory changes to the health care system and methods of reimbursement.
Reputation	Negative publicity, whether true or not, causes a decline in the customer base, costly litigation and/or revenue reductions.	Strong	The business segment within which MHP operates has a low probability of being affected by reputation concerns.

The corporate systems and internal control structure were discussed with management through questionnaires, interviews and a review of the work performed by MHP's independent public accountants.

The systems and internal control environment were found to need certain enhancements in order to provide reasonable assurance that corporate assets are adequately protected and that financial and insured data is being accurately processed and reported. The overall enterprise risk exposure of MHP, as determined by the examiners' risk review assessment, is considered moderate.

Status of Prior Examination Findings

The examination included a review to determine the current status of the recommendations noted in the previous Report of Examination as of December 31, 2004. No recommendations were made in the previous examination report.

SUBSEQUENT EVENTS/CONTINGENT LIABILITIES

Effective January 1, 2009, MHP and CMS agreed to terminate MHP's contract for the Medicare Private Fee for Service product.

MHP is currently corresponding with the Minnesota Department of Revenue to determine whether it is subject to premium taxation on certain written premium.

COMPANY HISTORY

The Minnesota Department of Health (hereinafter referred to as MDH) issued Hennepin County, Minnesota (hereinafter referred to as the County) a certificate of authority on October 19, 1983, in accordance with Minnesota Statutes 62D, to operate a health maintenance organization (hereinafter referred to as an HMO). The County, a metropolitan governmental unit of the State of Minnesota, subsequently created MHP as an "enterprise fund" within its governmental system and commenced business as an HMO on June 1, 1984.

MANAGEMENT AND CONTROL

Commissioners and Officers

MHP is governed by the Hennepin County Board of Commissioners, serving as MHP's governing board, which consisted of the following seven individuals at December 31, 2008:

<u>Director</u>	<u>First Elected</u>
Gail Dorfman – Chair	1999
Mark Stenglein – Vice Chair	1997
Jan Callison	2008
Jeff Johnson	2008
Randy Johnson	1979
Peter McLaughlin	1991
Mike Opat	1993

At December 31, 2008, the principal operating officers of MHP and their positions were as follows:

<u>Name</u>	<u>Position</u>
Suzanne M. Zuidema	Executive Director
Cynthia M. MacDonald	Chief Operating Officer
Timothy A. Schultz	Chief Financial Officer
Sandra L. Hvizdos	Chief Information Services Officer

Enterprise-Wide Risk Management

Risk assessment and management activities are under the direction of MHP's senior management. These activities are coordinated within the current corporate planning and budgeting processes through various management reporting functions.

Strategic Planning

MHP's senior management is in process of updating its strategic planning and risk assessment programs. The planning process does not currently include formal procedures for monitoring and amending the plan on an on-going basis.

Conflict of Interest

The County has a conflict of interest policy in place which requires annual completion of conflict of interest statements and statements of economic interest by certain employees. The statements completed by MHP personnel, for the period under examination, were reviewed and no material conflicts were noted.

CORPORATE RECORDS

Articles of Incorporation and By-laws

MHP operates as an enterprise fund of the County and has no corporate structure. Therefore there are no Articles of Incorporation.

Executive Management Minutes

MHP's executive management meeting minutes were reviewed, for the period under examination. Pertinent discussions and actions taken were noted and applied during the course of the examination.

Policies, Procedures and Internal Controls

The County's internal audit department performs period reviews of MHP as directed by the County Board's audit committee. MHP's external auditors perform certain reviews of the corporate system of internal controls as part of the annual audits. Accountability for managing MHP's risk environment resides primarily at the corporate senior management level.

AFFILIATED ENTITIES

Hennepin County

The County is a political subdivision instrumentality of the State of Minnesota, which functions as a metropolitan governmental unit. MHP is an "enterprise fund" within the County.

The County acts as a guaranteeing organization for MHP. This guarantee provides that the County will fund any deficiencies in MHP's surplus in order to meet minimum regulatory surplus requirements.

During 2008, the County transferred \$6 million to MHP's paid in surplus and paid MHP \$2.4 million for reimbursement of leasehold improvements/moving expenses.

The County provides MHP with certain management and administration services on a cost basis. Included in these costs are certain allocated indirect costs. Administrative costs paid by MHP to the County were: 2008 - \$2.3 million, 2007 - \$2.4 million, 2006 - \$2.2 million, 2005 - \$1.8 million.

Hennepin County Medical Center (HCMC)

HCMC is a public subsidiary corporation of the County. HCMC is a major health care provider utilized by MHP. Amounts incurred by MHP for health care services from HCMC were: 2008 - \$37.9 million, 2007 - \$33.6 million, 2006 - \$32.4 million, 2005 - \$34.3 million.

FIDELITY BOND AND OTHER INSURANCE

The County, which provides personnel staffing for MHP, maintains fidelity bond coverage with limits that are in excess of the minimum suggested NAIC guidelines. The County also carries general corporate insurance coverages as deemed necessary and proper.

EMPLOYEE BENEFITS

The County provides various group benefits to qualified MHP personnel. Qualified personnel are also eligible to participate in certain tax deferred retirement plans. MHP is allocated the costs of these programs for its personnel.

Neither MHP nor the County is a party to any employment contracts or deferred compensation plans involving any MHP personnel.

The County established a post retirement health program for qualifying employees in 1967. Eligibility requirements for benefits under this program include being retired from the County and being between the ages of 55 and 65. MHP carried a liability of \$440,436 at year end 2008 for this program.

STATUTORY & SPECIAL DEPOSITS

Minnesota Statutes, Section 62D.041 requires all domiciled HMO's to have on deposit, in a custodial account, funds for the protection of its insureds in the amount of at least 33% of the previous year's uncovered expenditures or \$500,000, whichever is greater. In lieu of this deposit requirement, MDH has allowed a guaranteeing entity to fund this deposit. The County, in January 1990 agreed, by resolution, to serve as the guaranteeing organization for MHP's required deposit. MDH subsequently approved the County as MHP's guaranteeing organization. MHP had no other restricted admitted asset balances at December 31, 2008.

TERRITORY AND PLAN OF OPERATION

MHP is authorized in Minnesota as a health maintenance organization.

MHP's market service areas includes the twelve Minnesota counties of Anoka, Carver, Chisago*, Dakota, Hennepin, Isanti*, Polk*, Ramsey, Scott, Sherburne*, Washington and Wright*.

(* These service areas are being eliminated in 2010).

MHP contracts with the Minnesota Department of Human Services (DHS) and the Centers for Medicare and Medicaid Services (CMS) to provide health care services to qualified enrollees in certain DHS and CMS programs. MHP also offers benefit plans in conjunction with the Medicare Advantage Programs.

MHP receives monthly capitation payments from DHS and CMS for enrollees in the government sponsored plans.

MHP contracts out to third-party administrators the pharmacy and dental aspects of the programs. The pharmacy and dental administrators also process and pay claims.

MHP does not market its products through traditional insurance sales channels. Coverage is available to enrollees only through that person's eligibility for one of the aforementioned public programs.

Third Party Administrators

CaremarkPCS Health, L.P./SilverScript, Inc.

Caremark provides management and administrative services, for prescription drug benefit plans to MHP members. Administration, under this agreement, includes but is not limited to pharmacy network oversight, network contracting, formulary services, claims processing and customer service.

Delta Dental of Minnesota

Delta Dental of Minnesota provides administration of certain dental services, for members of MHP, through authorized Delta Dental providers. Administrative services include, but are not limited to, access to Delta Dental network providers, claims processing, and customer service functions.

MARKET CONDUCT

Claims Settlement Practices

Procedures performed in conjunction with the claims review work indicated that MHP investigates and settles claims on a timely and equitable basis.

Complaint Procedures

MHP has formalized procedures for addressing and documenting insured member complaints. These procedures indicate that complaints are adjudicated by MHP in a fair and equitable manner.

REINSURANCE

MHP reinsures on an excess of loss basis with an A+ rated carrier. MHP retains the first \$200,000 of eligible expense risk per member per year. The reinsurer covers 90%-95% of the excess risk to a lifetime maximum of \$2,000,000 per member.

The provisions of the reinsurance contract were reviewed and were found to comply with all reinsurance requirements of Minnesota Statutes.

MHP does not assume insured risk from any other company.

ACCOUNTS AND RECORDS

Systems/Operations Databases & Business Continuation

MHP's books and supporting records are processed and maintained on a combination of MHP and County software run on County EDP equipment.

MHP's regulatory reporting forms were reviewed for proper completion in accordance with Minnesota Rule 4685.1910 and the related NAIC Annual Statement Instructions. No material deviations were found.

MHP is subject to internal audit by the staff of the County, as directed by the County Board Audit Committee.

MHP has a formal written plan for business continuation due to natural disaster or other event causing loss of part or all of its operating capacity. The MHP plan outline covers all significant necessary aspects of reasonable recovery.

Safekeeping of Assets and Investment Policy

All MHP investments are held in a County investment pool managed by County personnel. All MHP deposits and disbursements are processed through this pool. MHP receives monthly allocated interest based on its proportionate interest in the pool balance. The pool assets are currently made up of short-term US Government Agency mortgaged backed securities.

MHP is exempt from the investment policy provisions of Minnesota Statutes 62D.045 and 60A.112 as it has a county as a guaranteeing organization.

Designated Independent Public Accountants

The books and records of MHP are audited annually by independent public accountants in accordance with Minnesota Statutes 62D.08. During the period under examination, the designated independent public accounting firm was McGladrey & Pullen, LLP. MHP received unqualified audit opinions in all examination years.

Loss Liabilities

The Minnesota Department of Commerce developed claim liability projections and compared them to values carried by MHP at December 31, 2008. The examination consisted of review of the underlying data using procedures prescribed by the NAIC Financial Condition Examiners Handbook and other procedures as determined necessary by the Department actuary to provide adequate validation of the data. Based on the procedures applied, the claim liabilities appear to be reasonably stated and have been accepted for the purposes of this report.

Federal and State Taxes

MHP is exempt from Federal income taxation under IRC section 501(c)(3) and is exempt from State income taxation under Minnesota Statutes section 290.05. MHP is currently in discussions with the Minnesota Department of Revenue to determine whether it is subject to taxation on certain premium received from State government agency sources.

Risk Based Capital Ratio

MHP's year end 2007 and 2008 total adjusted capital to authorized control level ratio fell into action level status. The County, as MHP's guaranteeing organization, made capital contributions in 2008 to increase the RBC ratio above action level. The MDH determined, in March 2009, that MHP had sufficient operating funds and therefore the County would not have to provide an additional infusion of capital to bring the year end 2008 RBC ratio above action level.

FINANCIAL STATEMENTS

The following are MHP's reported statutory statements of admitted assets, liabilities and unassigned funds as of December 31, for the years 2005 through 2008, and the related statutory statements of operations and cash flows for the years then ended, as reported by MHP. The examiners have incorporated these statements into this report without adjustments.

Metropolitan Health Plan
Statements of Assets, Liabilities, Surplus and Other Funds
As of December 31,

	<u>2008</u>	<u>2007</u>	<u>2006</u>	<u>2005</u>
<u>Assets</u>				
Properties Occupied by the Company	\$ 1,418,129	\$ 1,993,990	\$ 0	\$ 0
Cash and Short-Term Investments	15,784,600	25,147,975	23,542,349	23,677,526
Cash and Invested Assets	\$ 17,202,729	\$ 27,141,965	\$ 23,542,349	\$ 23,677,526
Uncollected Premiums	6,533,678	4,560,165	4,062,705	4,242,385
Recoverable from Reinsurers	0	0	32,248	725,619
Receivable from Uninsured Plans	59,268	1,200,298	591,420	365,427
Data Processing Equipment & Software	1,863,903	4,598,099	4,876,095	2,400,460
Furniture & Equipment	3,554	8,481	411,423	34,045
Receivable from Affiliates	886,172	250,050	0	712,277
Healthcare Receivables	376,149	134,310	58,764	49,429
Total Admitted Assets	\$ 26,925,452	\$ 37,893,368	\$ 33,575,005	\$ 32,207,168
<u>Liabilities</u>				
Claims Unpaid	\$ 18,349,176	\$ 13,366,491	\$ 11,985,299	\$ 10,002,263
Unpaid Claim Adjustment Expenses	433,000	250,000	250,000	500,000
Aggregate Health Policy Reserves	23,983	1,001,662	70,505	0
Premiums Received in Advance	0	8,263,717	7,499,904	7,153,281
General Expenses Due or Accrued	3,018,327	2,236,543	3,417,517	1,932,467
Liabilities Under Uninsured Plans	330,101	583,594	0	0
Total Liabilities	\$ 22,154,587	\$ 25,702,006	\$ 23,223,225	\$ 19,588,011
<u>Surplus</u>				
Unassigned Funds	4,770,865	\$ 12,191,363	\$ 10,351,780	12,619,157
Total Surplus	\$ 4,770,865	\$ 12,191,363	\$ 10,351,780	\$ 12,619,157
Total Liabilities and Surplus	\$ 26,925,452	\$ 37,893,368	\$ 33,575,005	\$ 32,207,168

Metropolitan Health Plan
Statements of Income and Reconciliation of Surplus
Years ended December 31,

	<u>2008</u>	<u>2007</u>	<u>2006</u>	<u>2005</u>
Net Premium Income	\$ 152,290,775	\$ 120,949,185	\$ 111,474,237	\$ 102,793,882
Total Revenues:	\$ 152,290,775	\$ 120,949,185	\$ 111,474,237	\$ 102,793,882
Hospital/Medical Benefits	\$ 88,317,964	\$ 64,123,247	\$ 59,192,682	\$ 56,790,317
Other Professional Services	14,390,738	12,347,184	8,851,957	9,092,586
Emergency Room & Out of Area	3,093,470	2,886,423	2,902,488	2,221,612
Prescription Drugs	9,695,243	9,344,091	11,396,147	12,355,758
Aggregate Write-ins Other Hospital & Medical	14,902,394	10,884,904	8,793,125	6,801,472
Subtotal	\$ 130,399,810	\$ 99,585,848	\$ 91,136,399	\$ 87,261,745
Net Reinsurance Recoveries	296,091	226,554	458,089	1,110,377
Total Hospital and Medical	\$ 130,103,719	\$ 99,359,294	\$ 90,678,310	\$ 86,151,368
Claim Adjustment Exp. including Cost Containment	10,623,448	4,613,497	4,014,628	3,455,584
General Administrative Expenses	21,972,199	23,378,695	19,667,663	16,550,189
Increase in Reserves	(1,000,000)	1,000,000	0	0
Total Underwriting Deductions:	\$ 161,699,366	\$ 128,351,485	\$ 114,360,601	\$ 106,157,141
Net Underwriting Gain or (Loss)	(\$ 9,408,591)	(\$ 7,402,300)	(\$ 2,886,364)	(\$ 3,363,259)
Net Investment Income Earned	976,342	934,907	899,537	483,144
Net Income (Loss)	(\$ 8,432,249)	(\$ 6,467,393)	(\$ 1,986,827)	(\$ 2,880,115)
<u>Surplus Account</u>				
Surplus – Beginning of Year	\$ 12,191,363	\$ 10,351,780	\$ 12,619,157	\$ 16,212,088
Net Income (Loss)	(8,432,249)	(6,467,393)	(1,986,827)	(2,880,115)
Change in Non-admitted Assets	580,314	(77,839)	(280,550)	723,501
Aggregate Write-ins	431,436	8,384,815	0	(1,436,314)
Net Change in Surplus for the Year	(7,420,499)	1,839,583	(2,267,377)	(3,592,928)
Surplus – End of Year	\$ 4,770,864	\$ 12,191,363	\$ 10,351,780	\$ 12,619,160

Metropolitan Health Plan
Statements of Cash Flows
Years ended December 31,

	<u>2008</u>	<u>2007</u>	<u>2006</u>	<u>2005</u>
<u>Cash from Operations</u>				
Premiums Collected Net of Reinsurance	\$ 141,075,867	\$ 122,146,695	\$ 112,071,045	\$ 102,184,690
Net Investment Income	976,342	934,907	899,537	483,144
Total	142,052,209	123,081,602	112,970,582	102,667,834
Benefit and Loss Related Payments	124,121,034	99,195,904	88,001,903	86,677,097
Commissions and Expenses	30,743,324	29,198,450	22,612,526	19,853,723
Total	154,864,358	128,394,354	110,614,429	106,530,820
Net Cash from Operations	(\$ 12,812,150)	(\$ 5,312,752)	\$ 2,356,154	(\$ 3,862,987)
<u>Cash from Investments</u>				
Proceeds from Investments Sold, Matured or Repaid:				
Miscellaneous Proceeds	\$ 575,861	\$ 0	\$ 0	\$ 0
Total Investment Proceeds	\$ 575,861	\$ 0	\$ 0	\$ 0
Cost of Investments Acquired (Long-Term Only):				
Real Estate	\$ 0	\$ 1,639,211	\$ 0	\$ 0
Total Investments Acquired	\$ 0	\$ 1,639,211	\$ 0	\$ 0
Net Cash from Investments	\$ 575,861	(\$ 1,639,211)	\$ 0	\$ 0
<u>Cash from Financing and Miscellaneous Sources</u>				
Cash Provided (Applied):				
Other Cash Provided (Applied)	2,872,914	8,557,590	(2,491,331)	(3,626,650)
Net Cash from Financing & Misc. Sources	\$ 2,872,914	\$ 8,557,590	(\$ 2,491,331)	(\$ 3,626,650)
<u>Reconciliation of Cash & Short-Term Investments</u>				
Net Change in Cash and Short-Term Investments	(\$ 9,363,375)	\$ 1,605,627	(\$ 135,177)	(\$ 7,489,637)
Cash & Short-Term Investments:				
Beginning of Year	\$ 25,147,975	\$ 23,542,349	\$ 23,677,526	\$ 31,167,163
End of Year	\$ 15,784,600	\$ 25,147,975	\$ 23,542,349	\$ 23,677,526

CONCLUSION

Acknowledgement is hereby made of the courtesy and cooperation extended by the personnel of MHP during the course of this examination.

Participating in the examination were James Carr and Daniel Vogelgesang of the Minnesota Department of Commerce. RSM Consulting was retained to review the information systems environment.