Use of a New Software Tool to Enhance Utilization Compliance Reviews

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History of the UCR Contract

- Contract between The Georgia Department of Community Health and Georgia Medical Care Foundation, Inc. for Administrative Service Organization Services for Selected Medicaid Members: Utilization and Compliance Review
- "Go live" date July 1, 2007
- Approximately 700 reviews per year
- Implementation phase-reviews performed in coordination with DCH Program Integrity section reviewers
- Operational phase-Independent nurse review by GMCF-began about 6 months later
- After some initial lag due to implementation phase, training of personnel, and determining staffing needs-total reviews July 1, 2007 to March 31, 2009 is 1424
- Total recoupable funds at initial review FY '09-\$6,331,522.27.

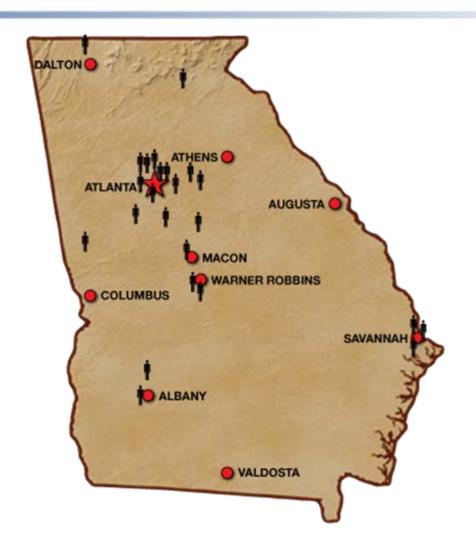


Developing a Methodology

- For each review type, the Department of Community Health Provider Manual was carefully reviewed to establish policy citations, and these were loaded into the MedGuard system
- Reviewers were trained intensively in one area of review, with general training in policies, procedures, and use of the MedGuard system
- As new reviewers were added, they received in-house training on the MedGuard system and were assigned to a reviewer in the field for orientation
- Subsequent cross-training has allowed reviewers to review additional waiver types

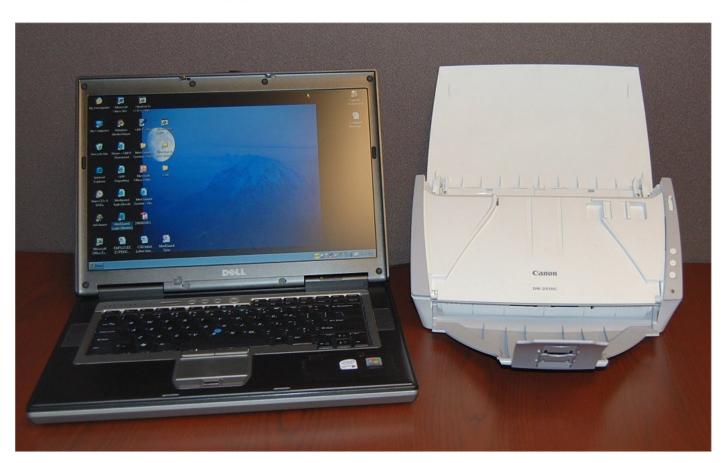


Geographic Distribution of Field Reviewers





Tools for the Field

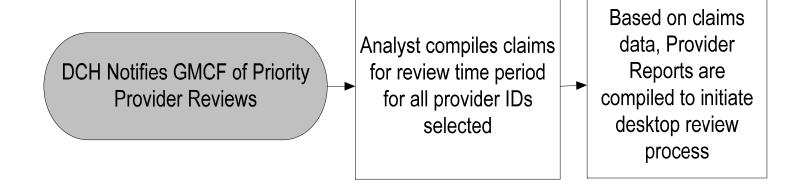




Abbreviations

CSB Community Service Board **CCSP Community Care Services Program** ICWP Independent Care Waiver Program MRWP Mental Retardation Waiver Program CHSS Community Habilitation Support Services **SOURCE Service Options Using Resources in Community Environments GAPP** Georgia Pediatric Program







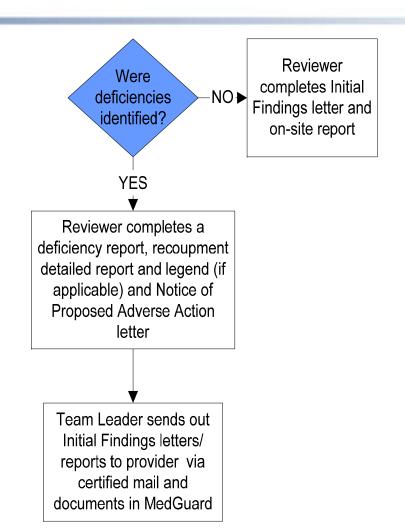
Reviewer selects members for record review and home visit based on established procedure and documents in MedGuard

Reviewer conducts entrance interview, obtains info for review and obtains sign off of Entrance Interview form

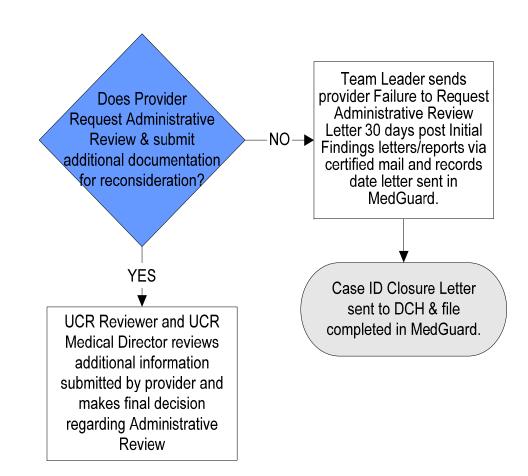
Reviewer completes member record review, provider on-site review, claims review and review hours in MedGuard

Reviewer conducts Exit Interview, reviews preliminary findings and obtains Provider sign off of Exit Interview Form

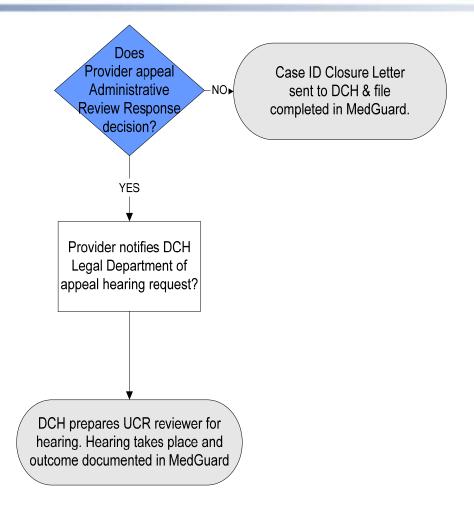














MedGuard Technical Overview

- Web based. Developed using Microsoft's .NET Framework version 3.5 (application layer) and Oracle's 9i (now 10g) database
- All reports and letters generated by staff are available via our web based reporting site (Reports and letters are written in Crystal Reports)
- Monthly and quarterly reports run automatically and are delivered via scheduled SAS jobs
- Reviews can be 'downloaded' by reviewers. Once downloaded, reviewers can conduct reviews without Internet connectivity.



MedGuard Requirements-Year 1

- Determine appropriate, consistent association of review types and policy citations. We created a data driven approach that allows us to add different review 'types' with minimal development.
- Accommodate policy changes and revisions dynamically. We understood that policy citations and descriptions-as well as the program itself-evolve over time. We capture the policy information associated with the review, and provide tools for clinicial staff
- Data needed to be secure.
- Minimize trips to Atlanta. Staff is dispersed throughout the state; time spent in the office is time not spent doing reviews.
- Automate and calculate as much as possible. Minimize the administrative burden on our clinical staff.



What We Didn't Know

- Support time associated with equipment issues for review staff. IT had not previously supported the equipment needed for this work (ie, scanners, encrypted laptops), and we tried to do too much. We learned the importance of getting support contracts from vendors who can apply fixes 'in the field'-minimizing IT intervention for hardware problems.
- The varying degree of reporting and letter requirements for a single review. We took a manual process and ported it into an automated one; manual deliverables do not always fit neatly into an automated world.
- Supporting large number of remote users who usually weren't online until after normal business hours. IT had to learn how to better troubleshoot and anticipate issues.





Review Number:

Provider Cos:

CCSP DEIDENT

Provider Name: DEIDENTIFIED CCSP PROVIDER

CCSP

Case ID:

Provider ID:

OIG09-01118 XXXXXX059A

Specialty Code:

Med Guard System - Provider Onsite Review for CCSP

retrieving and compiling information, the provider must assure that clinical records are accurately documented, readily accessible, and

AttachedFiles

Provider Onsite Review Complete

Review Start Date: 3/25/2009

Review Number: CCSP_DEIDENT

Provider DBA Name: DEIDENTIFIED CCSP PROVIDER

Review End Date : 3/25/2009

Provider Onsite Review Date: 3/26/2009

Provider Onsite Reviewer : SKANE

Save Save and Go back to Review Admin Back to Review Admin Recoupable/ Policy Meets Internal C Item# **Policy Requirement** Addendum Comments Policy? Citation Deficiency An ALS-Group Model personal care home is a freestanding 1201.1 O Yes residence, non-institutional in character and appearance, and O No licensed to serve seven (7) to twenty-four (24) members. A designated responsible staff person is on the premises 24 hours a day, seven days a week. The minimum direct-care staff to member ratio is: at least one (1) 1204.1 O Yes qualified staff member on duty per fifteen (15) residents/members, O No at least two (2) qualified staff members on duty per twenty-four (24) residents/members during waking hours (waking hours, at a minimum, are from 7:00 AM to 8:00 PM), at least one (1) qualified staff member on duty per twenty-four (24) residents/members during non-waking hours (8:00 PM to 7:00 AM) The provider maintains a work schedule that shows coverage for 1204.1 O yes 24 hours, seven days a week, with sufficient numbers of staff on O No duty at all times to meet the members' needs. The current work schedule is posted; work schedules are kept a minimum of four (4) months and are available for review when requested. Provider must maintain clinical records on all members in accordance 601.5 and r O Yes with accepted professional standards and practices. To facilitate 606.4

O No



Review Number: Provider Name:

CCSP_DEIDENT

DEIDENTIFIED CCSP PROVIDER

Provider Cos: CCSP Case ID:

OIG09-01118

Provider ID: Specialty Code: XXXXXX059A

Med Guard System - DeskTop Review for Member Claims

Member Level Review data

Member Id: XXX007543239

Member First name: RUBY

Date of Birth: 3/26/1933

Gender: F

Selected for Onsite Review : @ Yes C No

Date of selection: 3/25/2009

Selection Designated by : SKANE

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UU		СΠ	lo.

Submit

Select Member

Change Provider

Review Administration

Claims

	TCN	From Date	To Date	Used Units	Used Amount	Billed Units	Billed Amount	Units Not Allowed	Procedure	Procedure Description	Modifier 1	Modifier 2	Modifier 3	Modifier 4	Diagnosis1	Diagnosis1 Description	
	608XXXXX007543257	4/1/2008	4/30/2008	30	595.2	30	1051.2		T1020	PERSONAL CARE SER PER DIEM	HQ				045.1	AC PARALYTIC POLIO NEC	XXXXXX059A
	608XXXXX007543260	5/1/2008	5/31/2008	31	630.24	31	1086.24		T1020	PERSONAL CARE SER PER DIEM	HQ				045.1	AC PARALYTIC POLIO NEC	XXXXXX059A
	608XXXXX007543259	6/1/2008	6/30/2008	30	595.2	30	1051.2		T1020	PERSONAL CARE SER PER DIEM	но				045.1	AC PARALYTIC POLIO NEC	XXXXXX059A
- 1									1	DEDCOMAL						la c	

Review Number: CCSP_DEIDENT

Provider Name: DEIDENTIFIED CCSP PROVIDER

Provider Cos: CCSP

Case ID: Provider ID: OIG09-01118 XXXXXX059A

Specialty Code:

Back to Review Administration	1
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Reset

Med Guard System - Review Administration Letter / Reports Tracking

Date DCH-10 Form requested :	3/19/2009	Date DCH-10 Form received : 4/21/2009
DCH Case ID Number :	OIG09-01118	
Date Federal Exclusion (FEL) list verified :		Date FEL sent to DCH :
Date Entrance / Exit forms sent to DCH :		
Initial Review Findings	(Check all that apply)	
Initial Findings Letter with no Deficiencies		
Initial Findings Letter with Deficiencies		
Specific Medical Records Deficiency Report		
Notice of proposed Adverse Action		
Recoupment Detailed Report		
Recoupment Legend		
Provider Onsite Review Report		
Initial Findings Letter		
Follow-up review?	C Yes C No	Follow-up review due date:
Revision # Date Letter Sent to D Approval	DCH to GMCF	
		<u>ddd</u>
		<u>dd</u>
		.dd
Date Initial Findings/ Reports approved to ser	nd to Provider :	
USPS Tracking Number:		Date Green card returned:

~							
Review Number:	CCSP_DEIDENT		(Case ID:	OIG09-01118	8	
Provider Name:	DEIDENTIFIED CCS	SP PROVIDER	1	Provider ID:	XXXXXXX059	Α	
Provider Cos:	CCSP			Specialty Code:			
Med Guard System - Exi	t Conference	Worksheet					
Analyst Nam	e : SKANE	▼		Exit Date : 5/4/	2009		
Review Period From Dat	e: 3/26/2008		Review	Period To Date : 3/25	/2009		
Agency Nam	e : DEIDENTIFIED CC	SP PROVIDER	Admi	nistrator Name : Johr	n Smith		
Provider Number	er:XXXXXXX059A		R	eview Number : CCS	P_DEIDENT		
Provider Address :							
Addres	s: 123 CCSP PROVI	DER DR		City: ATL	ANTA		
State : GA			Zip : 30339				
Count	y : Ware		C	ontact Number : 912-	-555-1234		
							_
Completed Provider Employee List I	Received from:			Date	:		
Licensure / Training Verification Re	eceived from:			Date	e:		
-							
Service Provided	Provider Number	# of Members Reviewed	Client Interviews		Comments		
							_
Alternative Living Services-Group	XXXXXX059A	0	0				
				<u> </u>			▼
				•			
Documentation Requested but	NOT provided:						
There are no "Documentation Requ	ested but NOT provi	ided" items available	₿.				
Attendee Name		Title		Sig	ınature		
				1		Add	1
						Add	

Doc

Attendee Name	Title	Signature	
			<u>Add</u>
John Hilton	Owner		<u>Delete</u>
Sean Kane RN	GMCF Reviewer		<u>Delete</u>
х			<u>Delete</u>

Provider Initial

Clarifications made as needed:

C Yes C No C N/A _____

O Ves O No O N/A Deficiencies outlined to Provider:



Review Number: Provider Name: CCSP_DEIDENT

DEIDENTIFIED CCSP PROVIDER

Provider Cos: CCSP

Case ID: Provider ID: OIG09-01118 XXXXXX059A

Specialty Code:

Med Guard System - Review Hours Management

Total hours spent on review: 4.5

Date span encompassed : 3/25/2009 - 3/25/2009

Hours by task

Task	Hours Spent
Team Leader Oversight	1
Desktop Review	3.50

Claims

Reviewer	Entry Date	Hours Spent	Task	Comments	
BKENNEDY	3/25/2009	1	Team Leader Oversight		Edit Delete
	Hours / Entry Dt	1			
JHIBBERT	3/25/2009	2	Desktop Review		Edit Delete
	Hours / Entry Dt	2			
SKANE	3/25/2009	1.50	Desktop Review	downloads printing and calls	Edit Delete
	Hours / Entry Dt	1.5			ESTATE ASSESSED

Add Review hours

Close Window

ase enter Search Criteria.

Review Number :		Pr	rovider ID :
Review Status :	▼	Ass	signed to :
[▼	
Category of Service :		DC	1 Case ID :

Search

lect a Provider to review.

Provider ID	<u>Provider</u> <u>Name</u>	Review Number	Review Year	Review Type	Case Disposition	Service Type	Assigned To	Category of Service	DCH Case ID
XXXXXX059A	DEIDENTIFIED CCSP PROVIDER	CCSP_DEIDENT	2007	Non- Targeted	Open	ALSG	SKANE	CCSP	OIG09-01118

tal Results Found: 1

Results displayed: 1

Results: 1-1

sults: Previous 1-1 Next

earch again



Review Number: CCSP_DEIDENT
Provider Name: DEIDENTIFIED CCSP PROVIDER
Provider Cos: CCSP

CCSP Specialty Code:

Med Guard System - Review Administration

Desktop Review Member List	Onsite Review Member List	Review Hours	Contacts	Provider Onsite Review
Change Provider	Administrative Review Changes	ReviewEntrance	ReviewExit	Review Admin Letter Tracking
Checklist	Logout			

Case ID:

Provider ID:

OIG09-01118

XXXXXX059A

Provider Information

Provider ID: XXXXXX059A	Provider COS: CCSP		
Provider Name: DEIDENTIFIED CCSP PROVIDER	National ID:		
Specialty Code:	County: Ware		
Provider Administrator: John Smith	Contact Number: 912-555-1234		
Contact Email:	Contact Title: Owner/Administrat		
hysical Address			
Address: 123 CCSP PROVIDER DR	Address 2:		
City: ATLANTA	State: GA		
ZIP Code: 30339			
ail To Address			
Address:	Address 2:		
City:	State:		



Review Number: CCSP_DEIDENT

Provider Name: DEIDENTIFIED CCSP PROVIDER Provider ID: XXXXXX059A

Provider Cos: CCSP Specialty Code:

Med Guard System - DeskTop Review Administration

Desktop Review Start Date : 3/25/2009 mm/dd/yyyy

Desktop Review Status : Completed

Claims Review Period Start Date : 3/26/2008

Last Date Reviewed : mm/dd/yyyy

Reason For Review: Non-Targeted

Date provider notified of onsite visit: 3/25/2009

Desktop Review End Date : |

Case ID:

3/25/2009 mm/dd/yyyy

Assigned To : SKANE

Claims Review Period End

Date: 3/25/2009

mm/dd/yyyy

Provider Previously

Reviewed?

Majority of Claims used: ALSG

Time notified: (hh:mm) 2:00

PM ▼

OIG09-01118

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Submit

Change Provider

Review Administration

Confirm Mass Onsite Review Selection

Select a Member to review.

ocicet a member to review.						
Member ID	<u>Last Name</u>	<u>First Name</u>	DOB	Social Security Number	Selected for Onsite Review?	Mass Onsite Review Selection
XXX007543239	XXXXXXXXXXX	RUBY	3/26/1933	XXX-XX-XXXX	Yes	
XXX007543240	XXXXXXXXXX	DOROTHY	8/25/1930	XXX-XX-XXXX	Yes	
XXX007543237	XXXXXXXXXX	JOSEPHINE	5/29/1916	XXX-XX-XXXX	Yes	
XXX007543233	XXXXXXXXXX	RUBY	2/8/1934	XXX-XX-XXXX	Yes	
XXX007543236	XXXXXXXXXXX	PATSY	12/14/1927	XXX-XX-XXXX	Yes	

Letters

April 30, 2009

SENT VIA CERTIFIED MAIL

Sam Wilson MARLBORO HOME CARE SVS INC-CCSP-PSS450

OLD TRAIL ROAD

THOMASVILLE, GA 31792

Regarding: Administrative Review Response

Provider Number: 000542538AI Case Number: OIG09-00153BRS Control No: P001554

Dear Sam Wilson,

The Georgia Medical Care Foundation (GMCF) Utilization and Compliance Review staff, acting as an agent of the Department of Community Health, Division of Medical Assistance (DMA), received your letter dated 03/31/2009, on 04/03/2009. GMCF has completed its review of documentation from MARLBORO HOME CARE SVS INC, pursuant to your request for an Administrative Review. Initial audit findings that were not addressed in your request for Administrative Review may not be appealed during Administrative Hearing. Based on a review of the additional documentation submitted for Administrative Review, the Georgia Medical Care Foundation Utilization and Compliance Review Team has determined that there is decrease in the dollar amount of \$312.84. Please find attached a list of members for which your agency remains out of compliance with policies and procedures.



Results

UCR Quarterly Report 21APR09

Table 1-A. Overall Summary Statistics by Provider Category of Service.

Table 1-A. Overall Sullimary Statistics by Florider Category of Service.						
Category of Service	Total Members	Total Dollars Billed	Total Dollars Paid	Total Claim Lines		
440-CSB	5,495	\$7,312,796.17	\$7,142,214.08	122,375		
590-CCSP	5,570	\$25,300,245.53	\$23,146,669.90	156,708		
660-ICWP	855	\$5,075,790.60	\$5,058,819.92	16,290		
680-MRWP	2,076	\$39,022,683.90	\$38,790,308.42	103,981		
681-CHSS	239	\$12,627,202.77	\$12,611,894.64	56,640		
930-SOURCE	12,832	\$46,888,844.58	\$46,667,194.03	300,812		
971-GAPP	92	\$4,132,587.05	\$4,109,151.25	16,326		
Total	27,159	\$140,360,150.60	\$137,526,252.24	773,132		



Review Productivity Statistics by Provider Category of Service

	Cotomomy of	Initial Dollars	Haura Cnant	Initial Dollars	Members	Claim Lines	Percent of Dollars
	Category of	Identified Per	Hours Spent Per Review	Identified Per	Reviewed Per	Reviewed Per	Paid that were
Service Re	Review	Per Review	Hour	Review	Review	Initially Identified	
	440-CSB	\$117,684.84	187.50	\$627.65	50	6,634	25.35%
	590-CCSP	\$8,934.55	39.04	\$228.85	10	335	13.67%
	660-ICWP	\$7,289.40	26.50	\$275.07	7	249	11.40%
	680-MRWP	\$8,156.05	19.61	\$415.92	3	175	10.32%
	681-CHSS	\$18,204.26	24.74	\$735.97	5	784	7.38%
	930-SOURCE	\$12,769.98	50.29	\$253.94	19	736	10.32%
	971-GAPP	\$9,609.69	46.68	\$205.89	5	888	4.12%
	Total	\$10,279.29	29.80	\$344.94	7	372	11.20%

NOTES:

- (1) A single CSB review includes multiple providers.
- (2) Total Reviews = all reviews with an exit conference date occurring within the period for the report.
- (3) Initial Dollars Identified = Dollars identified for potential recoupment before administrative reviews.



Results

UCR Monthly Report 21APR09

Table 1. Summary Statistics by Provider Category of Service.

Tuble 1. Bullinary Buttisties by 1 to vider Category of Bervice.						
Category of Service	Reviews Initiated	Closed Reviews	Reviews with an Exit Date			
440-CSB	1	0	1			
590-CCSP	33	23	30			
660-ICWP	3	16	3			
680-MRWP	40	90	35			
681-CHSS	5	7	4			
930-SOURCE	19	7	14			
971-GAPP	0	2	0			
Total	101	145	87			

NOTE:

Reviews Initiated = all reviews with a desktop review start date occurring within the month prior to the report date.

Closed Reviews = all reviews with a case closed date occurring within the month prior to the report date.

Reviews with an Exit Date = all reviews with an exit conference date occurring within the month prior to the report date.



Top 10 Policy Violations for CHSS Providers

Rank	Item Number	Policy Description	Program	Provider Specialty	Count of Policy Violations
1	9	Activity Notes/Service Records	CHSS	CHHS	21
2	13	Member Record Management	CHSS	CHHS	19
3	13d	All known allergies are "flagged" conspicuously noted on the cover of the member's record and the member's primary physician and dentist are noted in the record with address and phone number.	CHSS	CHHS	13
4	17	Correction/alteration of records	CHSS	CHHS	13
5	17a	All errors are corrected according to currently accepted standards of medical practice.	CHSS	CHHS	13
6	18	Billing Discrepancies	CHSS	CHHS	11
7	18a	The units of service billed are supported by the units of service documented.	CHSS	CHHS	11
8	14	Directions to Member Residence	CHSS	CHHS	10
9	14a	Accurate directions from agency to client home are present.	CHSS	CHHS	10
10	9a	Documents actual services rendered	CHSS	CHHS	10



Top 10 Policy Violations for MRWP Providers

Rank	Item	Policy Description	Program	Provider Specialty	Count of Policy
N	Number	,	3	in a contract of a contract	Violations
1	16a	All errors are corrected according to currently accepted standards of medical practice.	MRWP	RTSS	74
2	9	Activity Notes/Service Records	MRWP	RTSS	69
3	12	Member Record Management	MRWP	RTSS	59
4	7	Intake/screening on record	MRWP	RTSS	57
5	13a	The units of service billed are supported by the units of service documented.	MRWP	RTSS	45
6	7b	Primary physician/dentist name and phone number are noted.	MRWP	RTSS	45
7	9	Activity Notes/Service Records	MRWP	DSS	44
8	9a	Documents actual services rendered.	MRWP	RTSS	38



MedGuard Advantages

- Consistency and standardization of reviews and training
- Mirrors DCH manual review process
- Increased speed of review and productivity of reviewers
- Ability to produce "real time" ad hoc reports as needed
- Management reports; enhanced billing and bidding
- QA trending reports and increased educational opportunities
- HIPAA compliance with all of files scanned and stored in specific provider review report
- Staff have access to desktop 24/7
- Increased recoupment for policy violations or quality of care concerns
- Greater success rate at hearings due to policy citation inclusions

