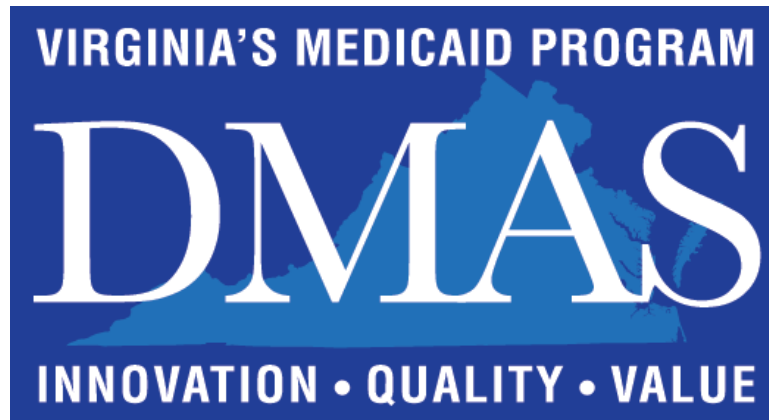


# Monthly MCO Compliance Report

**Medallion 4.0 February 2020 Deliverables**



**Health Care Services Division**

July 24, 2020

# Monthly MCO Compliance Report

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## Medallion 4.0 February 2020 Deliverables

### Contents

Compliance Points Overview.....	2
Summary.....	3
Aetna Better Health of Virginia.....	5
Anthem Healthkeepers Plus.....	7
Magellan Complete Care.....	9
Optima Health.....	11
UnitedHealthcare.....	13
Virginia Premier.....	15
Next Steps.....	18

# Compliance Points Overview

MCO	Prior Month Point Balance	Point(s) Incurred for Current Month*	Point(s) Expiring from February 2020	Final Point Balance*	Area of Violation: Finding or Concern
<u>Aetna</u>	9.0	0.0	0.0	9.0	<b>CONCERNS</b> Data Error
<u>Anthem</u>	9.0	0.0	0.0	9.0	<b>CONCERNS</b> Contract Adherence
<u>Magellan</u>	12.0	0.0	0.0	12.0	<b>CONCERNS</b> Late Submission
<u>Optima Health</u>	11.0	0.0	0.0	11.0	<b>CONCERNS</b> Contract Adherence
<u>United</u>	6.0	0.0	0.0	6.0	<b>CONCERNS</b> Data Error
<u>VA Premier</u>	20.0	0.0	0.0	20.0	<b>CONCERNS</b> Data Errors Late Submission

*\*All listed point infractions are pending until the expiration of the 15-day comment period.*

Notes:

-**Findings**- Area(s) of violation; point(s) issued.

-**Concerns**- Area(s) of concern that could lead to potential findings; **no** points issued.

-**Expired Points**- Compliance points expire 365 days after issuance. Thus, all points issued in February 2019 (Issue date: 3/15/19) expire on 3/15/20 and are subtracted from the final point balance.

# Summary

The **Compliance Review Committee (CRC)** met on April 1, 2020 to review deliverables measuring performance for February 2020 as well as other reported program issues. The CRC consists of five managers and supervisors from the Health Care Services division who vote on what, if any, compliance enforcement actions to take in response to identified issues of potential non-compliance.

Due to the current emergency crisis, HCS Compliance Unit will exercise its enforcement discretion and may not issue points and/or financial penalties on identified issues of non-compliance during this period, unless the identified areas of non-compliance are egregious violations.

HCS Compliance Unit will continue to monitor and document areas of non-compliance through issuance of Notices of Non-Compliance. The Department will expect health plans to come into compliance with all aspects of the Medallion 4.0 contract prior to the end of the emergency period.

The CRC voted to issue a notice of non-compliance to managed care organizations (MCOs) for failure to meet appeals process requirements, untimely deliverable submissions, data reporting errors, and payment to a suspended provider. Due to COVID-19, no compliance points were issued at this time.

Each MCO's compliance concerns are further detailed below. The Department communicated

the findings of its review of February's compliance issues in letters issued to the MCOs on April 3, 2020.

# Aetna Better Health of Virginia

## Findings:

- No findings

## Concerns:

- **Reporting Error:** DMAS timely received the February 2020 Appeals & Grievance Report deliverable from Aetna. Upon review, it was determined that the report was not following the reporting specifications. Specifically, Aetna did not enter the appropriate values into the “Type” field required by Section 1.12.6.1 of the Medallion 4.0 Deliverables Technical Manual.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Aetna violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

The Compliance Team recommended that in response to the issue identified above, Aetna be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team’s recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. **(CES # 2693)**

## MIP/CAP Update:

- No updates

## Appeal Decision:

- No appeals

## Expiring Points:

- No expiring points

## Financial Sanctions Update:

- No outstanding sanctions at this time

## Summary:

- For deliverables measuring performance for February 2020, Aetna showed a high level of compliance. Aetna timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. One reporting deliverable contained minor data errors (addressed above in **CES # 2693**). Aetna's member and provider call centers complied with abandonment ratio requirements and complied with all applicable provider payment timeliness requirements. In summation, Aetna complied with almost every applicable regulatory and contractual requirement.

# Anthem HealthKeepers Plus

## Findings:

- No findings

## Concerns:

- **Contract Adherence:** DMAS timely received the February 2020 Appeals & Grievance Summary deliverable from Anthem. Upon review, it was determined that Anthem did not meet the required contract thresholds for appeals processing limits. Specifically, Anthem had one appeal exceeding the max allowable time frame (30 days).

According to Section 12.3 of the Medallion 4.0 contract, the Contractor shall process, resolve, and provide notice to each appeal as expeditiously as the Member's health condition requires and shall not exceed 30 calendar days from the initial date of receipt of the appeal.

The Compliance Team recommended that in response to the issue identified above, Anthem be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. **(CES # 2694)**

## MIP/CAP Update:

- No updates

## Appeal Decision:

- No appeals

## Expiring Points:

- No expiring points

## Financial Sanctions Update:

- No outstanding sanctions at this time

## Summary:

- For deliverables measuring performance for February 2020, Anthem showed a high level of compliance. Anthem timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any



programmatic issues. One monthly deliverables contained a contract adherence issue (addressed above in **CES # 2694**). Anthem's member and provider call centers complied with abandonment ratio requirements. Additionally, Anthem complied with all applicable provider payment timeliness requirements. In summation, Anthem complied with almost every applicable regulatory and contractual requirement.

# Magellan Complete Care

## Findings:

- No findings

## Concerns:

- **Untimely Deliverable Submission:** Magellan failed to timely submit the weekly Provider File - Enrollment Broker that was due to The Department on March 16, 2020. According to Section 4.2.D of the Medallion 4.0 Contract and Section 1.4.3.1 of the Medallion 4.0 Deliverables Technical Manual, the Provider File – Enrollment Broker is to be submitted weekly on Mondays.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Magellan violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

The Compliance Team recommended that in response to the issue identified above, Magellan be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team’s recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. **(CES # 2692)**

## MIP/CAP Update:

- No update

## Appeal Decision:

- Magellan requested DMAS rescind the NONC issued on Encounter Data Certification (**CES # 2671**). The file was stuck with EPS and not could be accepted. Resubmission was accepted and certified. This was presented at the CRC meeting held on April 3, 2020 and the committee voted to rescind the original enforcement of the NONC.

## Expiring Points:

- No expiring points

## Financial Sanctions Update:

- No update

## Summary:

- For deliverables measuring performance in February 2020, Magellan showed a high level of compliance. Magellan timely submitted all but 1 of the 23 required monthly reporting deliverables (**CES # 2692**) and those deliverables did not expose any programmatic issues. Magellan's member and provider call centers complied with abandonment ratio requirements, and Magellan complied with all applicable provider payment timeliness requirements. In summation, Magellan complied with almost every applicable regulatory and contractual requirement.

# Optima Health

## Concerns:

- **Contract Adherence:** The Department timely received the February 2020 MCO Claims Report deliverable from Optima. Upon review, the Compliance Unit discovered that the report indicated that Optima paid a claim to a suspended provider.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Optima violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

The Compliance Team recommended that in response to the issue identified above, Optima be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. (CES # 2697)

## MIP/CAP Update:

- No updates

## Appeal Decision:

- No appeals

## Expiring Points:

- No expiring points

## Financial Sanctions Update:

- No update

## Summary:

- For deliverables measuring performance in February 2020, Optima showed a high level of compliance. Optima timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. One monthly deliverable contained a contract adherence issue (addressed above in **CES # 2697**). Optima's member and provider call centers complied with abandonment ratio requirements, and Optima complied with all applicable provider payment timeliness

requirements. In summation, Optima complied with almost every applicable regulatory and contractual requirement.

# UnitedHealthcare

## Findings:

- No findings

## Concerns:

- **Data Submission Error:** DMAS timely received the February 2020 Provider Network Change Policy annual deliverable from United. Upon review, it was determined that the report was not following the reporting specifications. Specifically, United used an incorrect file naming convention as required by the Medallion 4.0 Deliverables Technical Manual.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, United violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

The Compliance Team recommended that in response to the issue identified above, United be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. **(CES # 2700)**

## MIP/CAP Update:

- No updates

## Appeal Decision:

- No appeals

## Expiring Points:

- No expiring points

## Financial Sanctions Update:

- No outstanding sanctions at this time

## Summary:

- For deliverables measuring performance for February 2020, United showed a high level of compliance. United timely submitted all 23 required monthly

reporting deliverables, and those deliverables did not expose any programmatic issues. One monthly deliverable was submitted using an incorrect file naming convention (addressed above in **CES # 2700**). United's member and provider call centers complied with abandonment ratio requirements, and United complied with all applicable provider payment timeliness requirements. In summation, United complied with almost every applicable regulatory and contractual requirement.

# Virginia Premier

## Findings:

- No findings

## Concerns:

- **Data Submission Errors:** The Department timely received the February 2020 Foster Care Barrier Report deliverable from Virginia Premier. Upon review, the Compliance Unit discovered that the report indicated a formatting error (phone numbers) causing errors in remaining columns. The report also included aged out members that should not have been included (**CES # 2689**).

The Department timely received the February 2020 Return IDs Monthly Report deliverable from Virginia Premier. Upon review, the Compliance Unit discovered that the report indicated invalid member IDs (**CES # 2690**).

The Department timely received the February 2020 ARTS Provider Network File from Virginia Premier. Upon review, the Compliance Unit discovered missing information. Specifically, several providers were missing provider taxonomy codes (**CES # 2698**).

The Department timely received the February 2020 Appeals & Grievances Report from Virginia Premier. Upon review, the Compliance Unit found a reporting error in the APP\_GRIEV\_MCAID file. Specifically, Virginia Premier inaccurately reported 3 member appeals as provider appeals, and resulting in not meeting the required 30 days appeals process (**CES # 2699**).

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Virginia Premier violated the terms of the Medallion 4.0 contract in the deliverable submissions addressed above.

The Compliance Team recommended that in response to the issues identified above, Virginia Premier be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. (**CES # 2689, # 2690, # 2698 and #2699**)



- **Untimely Deliverable Submission:** Virginia Premier failed to timely submit the February 2020 Provider Network Change Annual Policy as required by the Medallion 4.0 Deliverables Technical Manual. The resubmission of the annual deliverable was due February 14, 2020 and received by DMAS on March 30, 2020 (CES # 2701).

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Virginia Premier violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

The Compliance Team recommended that in response to the issues identified above, Virginia Premier be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. (CES # 2701)

### **MIP/CAP Update:**

- No update

### **Appeal Decision:**

- No appeals

### **Expiring Points:**

- No expiring points

### **Financial Sanctions Update:**

- No update

### **Summary:**

- For deliverables measuring performance for February 2020, Virginia Premier showed a satisfactory level of compliance. Virginia Premier timely submitted all but 1 of the 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues (CES # 2701). Four monthly deliverables contained data submission errors (addressed above in CES # 2689, #2690, #2698 and \$2699). Virginia Premier's member and provider call centers complied with abandonment

ratio requirements, and Virginia Premier complied with all applicable provider payment timeliness requirements. In summation, Virginia Premier complied with most applicable regulatory and contractual requirement.

# Next Steps

At this time, the Compliance Unit is continuing monthly Compliance Review Committee meetings, following up on reoccurring issues, and communicating with the MCOs regarding identified issues. The Compliance Unit is in the process of expanding the types of compliance issues it investigates, and involving itself with programmatic issues as well as technical deliverable issues.

The Compliance Unit recently expanded its enforcement efforts into the area of encounter data certifications.

The Compliance Unit held its first virtual Compliance Review Committee, and is looking into alternative options and enhancements to facilitate the monthly meetings in a virtual setting. In addition, the Compliance Unit has generated 10 policy and procedure documents to date, and the long-term project to create policies and procedures is ongoing.

The Compliance Unit is continuing to closely monitor the current public health emergency with Covid-10 and will return to applying compliance points and penalties as necessary.