



COMMONWEALTH of VIRGINIA

Department of Medical Assistance Services

KAREN KIMSEY
DIRECTOR

SUITE 1300
600 EAST BROAD STREET
RICHMOND, VA 23219
804/786-7933
800/343-0634 (TDD)
www.dmas.virginia.gov

February 1, 2022

Jennie Reynolds, President
Anthem HealthKeepers Plus
2015 Staples Mill Rd
Richmond, VA 23230

Re: Commonwealth Coordinated Care Plus (CCC Plus) Program – Corrective Action Plan (CAP) – Payment cycle data – CID# 20190

Dear Ms. Reynolds:

The Department of Medical Assistance Services (DMAS) monitors the accuracy and timeliness of essential reports. The Contractor is required to adhere to the general reporting requirements specified in Section 16.9.4.1 which states that the Contractor shall:

- a) Collect and maintain 100% of all encounter data for each covered service and supplemental benefit services provided to Members, including encounter data from any sub-capitated sources. Such data must be able to be linked to the Department's eligibility data.
- b) Develop a process and procedure to identify drugs administered under section 340B of the Public Health Service Act as codified at 42 USC 256b, as drugs dispensed pursuant to this authority are not eligible for the Medicaid Drug Rebate Program as directed in Section 4.8.8 (Drug Rebates) of this Contract.
- c) Submit complete, timely, reasonable, and accurate encounter data to the Department within thirty (30) business days of the Contractor's payment date and in the form and manner specified by the Department. Standard formats, required data elements, and other submission requirements shall be detailed in its supporting documentation.
- d) Payment cycle data must be submitted and certified according to the CCC Plus Encounter Technical Manual.

Anthem HealthKeepers Plus (Anthem) was issued a Notice of Noncompliance (NoNC), Case ID # 19459, on June 17, 2020, for 3 quarters of non-compliance with payment cycle entry timeliness and payment cycle certification timeliness. On March 21, 2021, Anthem was issued a

Case ID # 20190

Managed Care Improvement Plan (MIP), Case ID # 19609, for continued failure to meet the requirements detailed in the Encounter Evaluation Guide and Data Quality Score Card (DQSC). As of the most recent quarter (SFY2022, Q1), Anthem continues to fall short of the target of DQSC requirements for these areas. The failure to become compliant with these required standards has now extended over 6 consecutive quarters.

DMAS is committed to working collaboratively with Anthem; therefore, we are requiring Anthem to submit a Corrective Action Plan (CAP) to DMAS for approval no later than 30 calendar days from the date of this letter, March 3, 2022. The CAP must address the failure to reach and maintain the required standards identified above. Anthem must identify the root cause(s) for lack of compliance and develop a practicable project plan that addresses when they will adhere to the payment cycle entry and certification timeliness requirements outlined in the contract and CCC Plus Encounter Technical Manual. DMAS will monitor Anthem's progress on the CAP to meet the milestones and ultimately, resolve the issue. Anthem will need to provide a written update to DMAS via email by close of business every Monday. Anthem and DMAS may meet via conference call to review and discuss Optima's progress. The first update of the CAP will be due March 7, 2022 or the first Monday after the project plan is approved by DMAS, whichever is earlier.

Anthem will be issued a 5 point violation and \$10,000 financial penalty pursuant to Section 18.0 of the CCC Plus Contract. Assessment of these points are pending. If you have additional information and/or documentation that will affect this determination, please provide this information to Jason A. Rachel, Ph. D., Division Director, within 15 calendar days from the date of this letter ("Comment Period"). Point violations will be finalized upon the expiration of the Comment Period. After this time, no additional communication will be provided by DMAS regarding the point issuance.

If you have any questions regarding these concerns, contract standards or CAP requirements, please contact cccpluscompliance@dmas.virginia.gov. Please sign, date and return acknowledging receipt to cccpluscompliance@dmas.virginia.gov.

Sincerely,



Tammy Whitlock, MSHA

Deputy Director of Complex Care and Services

Acknowledge agreement via signature below to address the issue regarding payment cycle data detailed in this compliance action.

Jennie Reynolds / Date

Exhibit 1 – Anthem – 2021 Point Schedule

<u>MCO</u>	<u>Area(s) of Violation</u>	<u>Previous Balance</u>	<u>Point(s) Expired</u>	<u>Point(s) Incurred</u>	<u>Current Balance</u>	<u>Sanctions pursuant to 18.2.2</u>
Anthem	16.9.4.1	45	0	5	50	\$10,000