

RAC Program Stakeholder Engagement Meeting

Colorado Department of
Health Care Policy & Financing (HCPF)

August 3rd, 2023

Today's Panelists from HCPF

- Fraud, Waste, and Abuse Division Director: **Bart Armstrong, Esq.**
- Recovery Audit Contract Section Manager: **Alyssa Gilger**
- Contract Audit Operations Project Manager & Unit Lead: **Prismar Perez**

Q&A Panelist(s):

- Provider Integrity Section Manager: **Sarah Geduldig**
- Audit Contract Manager & Operational/Fiscal Specialist: **Lydia Clark**

Agenda

- Previous Stakeholder Meeting Recap
- Colorado RAC Forms, Provider & HCPF Opportunities
- Colorado RAC Website & Communications Updates
- Audit Specific Update: Inpatient Audit Clarifications
- Rule Making Updates
- Upcoming Training & Stakeholder Meetings
- Q & A

Please note that litigation comments and ongoing lawsuit information, questions, and/or requests will not be addressed in this forum. For legal information: Please contact the Attorney General's Office.

Today's Meeting Goals

To Follow Up on:

- Provider requests
- Audit updates
- RAC program updates
- Provide education and information

These meetings are important to both the provider community as well as HCPF. We would like to use the time to be able follow up on many items that have been requested

These meetings are also crucial as it is important for all perspectives and ALL provider types to participate

Previous Stakeholder Meeting Recap

Attendance & Stakeholder Follow-up

Stakeholder Engagement Meeting, May 12, 2023

- 114 Attendees
- 51 Questions

Available on our Website:

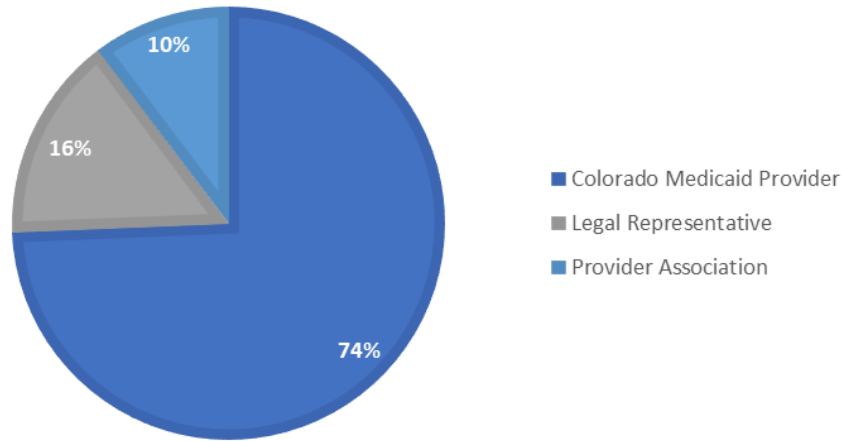
- Flyer(s) and webinar links
- Previous slide deck(s)
- Stakeholder Q&A follow-up with responses- coming soon
- Many HB23-1295 requirements have been posted via the website

Please check out the website

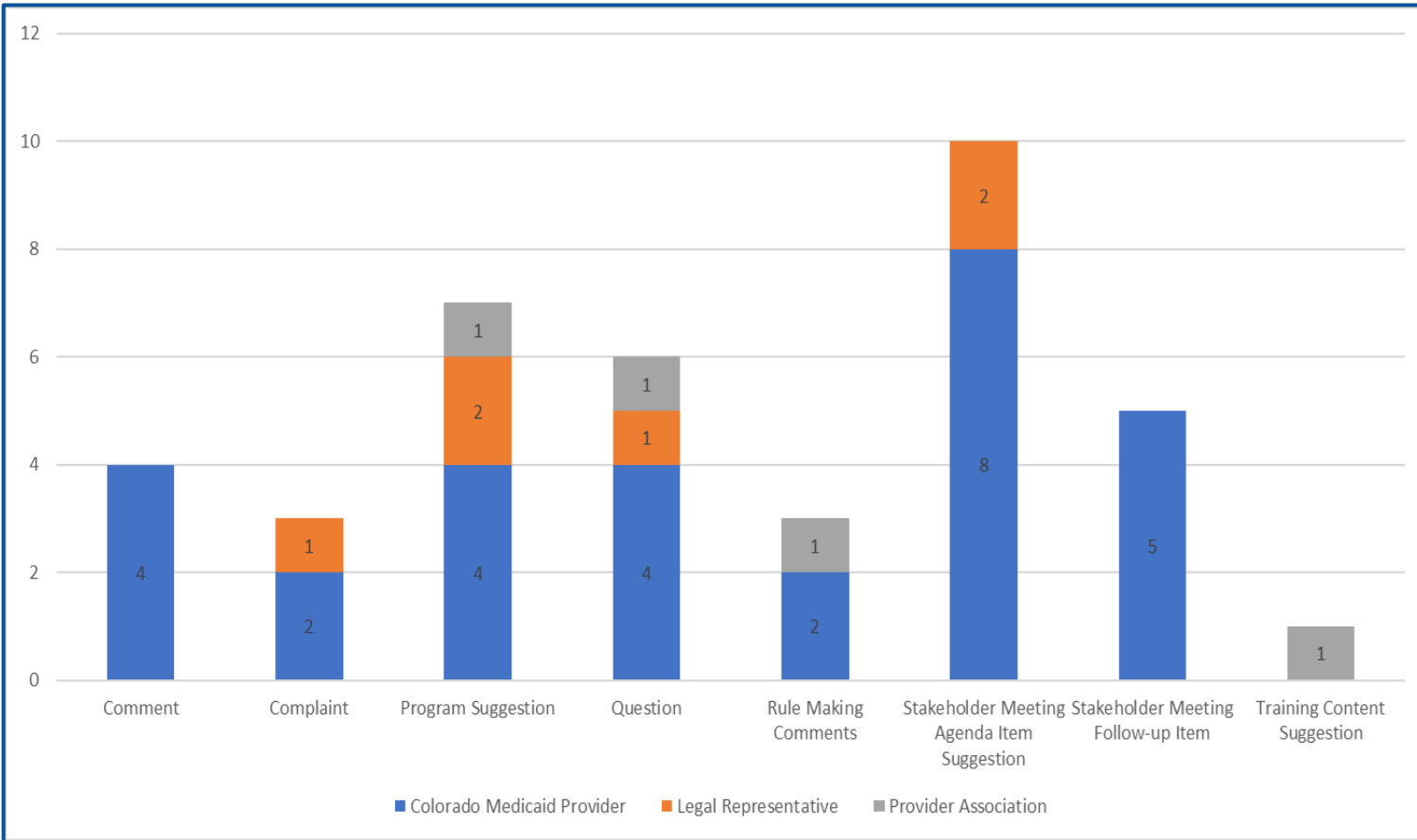
<https://hcpf.colorado.gov/recovery-audit-contractor-rac-program>

May-August 2023 RAC Stakeholder Form Summary

CONTACT AFFILIATION PERCENTAGES



- 29 out of the 39 Form submissions were by Providers
 - 6 were attorneys
 - 4 were associations
- 32 Different people (unique emails) submitted requests



Colorado RAC Forms, Provider & HCPF Opportunities

HCPF Opportunity for Communications Enhancements

Bottleneck Identified:

HCPF RAC Team Members are receiving in excess of 400 emails per day (each)

- This is unsustainable (for all of us)
- Provider requests do not always include all needed information
- If emails are sent to one specific person it can get lost in emails, is not routed properly, and is done out of queue
- Specific requests require a concentrated amount of time to gather all the information for correct & detailed response

The #1 Biggest Issue: It results in delayed responses to you

HCPF Opportunity for Communications Enhancements

Enhancement Opportunity:

HCPF RAC is asking provider to utilize the forms (via smartsheet) so we can :

- Streamline requests
- Assign responses to the RAC team
- More accessibility to the entire team
- Where emails would get lost in an inbox if someone was sick, now we can re-assign work throughout the team & get you what you need

The #1 Biggest Priority: Turnaround time to you!

All Links to Forms links are on the HCPF RAC Website:

<https://hcpf.colorado.gov/recovery-audit-contractor-rac-program>

New Form: Stakeholder Comments, Suggestions & Requests

Used for:

- Comments
- Complaints
- Questions
- Program Suggestions
- Stakeholder Meeting Agenda Item Suggestions
- Stakeholder Meeting Follow-up Items
- Training Content Suggestions
- Other

Enhancements:

- New link (Replaces the old Google form & all responses have already been moved into new form)
- Dedicated area for long comments
- Document upload feature

Please - No Protected Health Information (PHI)

New Form: HCPF RAC Email Blast Provider Contact List

Used for HCPF RAC Email Blasts:

- Upcoming Trainings
- Program communications
- Transmittals
- Stakeholder Agendas
- Informational Memos
- Training and Educational Material
- + any other communications we need to get you swiftly while we update our site

HCPF Requests:

- Providers are encouraged to utilize the form (on our website)
- You will receive quick updates and it will go to the specified emails you enter
- We have more transparency with you & you have the information you need

All email blasts are also published on our website for future reference

Provider Opportunity: Re-billing

Do you want to request to take part in the testing of inpatient to outpatient billing after programming of the claims system is completed?

Please visit our website and use the form to be considered.

Providers who participate would be:

- Testing the re-billing programming in the claims system
- Meeting with HCPF and HMS to vet issues
- Collaborate on best practices
- Work with HCPF to make clear, concise operational instructions to help give a biller's perspective

Update to re-billing:

- The manual re-billing process, given the number of claims and Provider interest in this process, is impossible to maintain manually for HCPF
- HCPF has paid for reprogramming of the claims system
- We are working with the vendor to get a solid ETA on when we can start testing the system

We appreciate your patience!

Provider Opportunity: RAC Provider Advisory Board

Do you want to request to take be on the RAC Provider Advisory Board?

Please visit our website and use the form to be considered.

The form (on our website) allows for upload of a resume/CV

Please - No Protected Health Information (PHI)

Considerations:

- Only Health First Colorado Providers will be considered
- HCPF is looking for members from different Provider type groups
- HCPF Executive Director, Kim Bimestefer, chooses members
- Once Board Members are selected, expect a welcome letter
- The Provider Advisory Board has a dedicated section on the HCPF RAC website
- The Board will work collaboratively with the HCPF RAC team to make creative solutions to issues related to their specific Provider type group(s)

Provider Opportunity: HCPF Upcoming Engagement Questionnaire

Provider Preferences & Program Enhancements

- HCPF will be asking for your preferences (all provider types)
- Providers who wish to participate in a Questionnaire from HCPF are encouraged to use *the “Contact” Form on our website to give email contact information*

Please note: This is not related to the HMA Survey that went out in June

The Questionnaire will be asking for provider’s specific preferences for RAC program enhancements based on:

- Common feedback from Colorado RAC stakeholders
- Other state RAC Programs
- CMS Guidance
- OIG & GAO recommendations

HCPF’s RAC Team will be sending out the survey prior to the next Stakeholder meeting.

Training Opportunities: Videos & Content Being Developed

- Tiers & Limits
- Informal Reconsideration Rights and Rules
- Audit Processes (Video)
- Automated Audits
- Complex Audits
- Self Disclosure, Self-Audits & Compliance Programs
- State Plan Amendments
- Correct Coding & HIPAA
- PHI and Sharing of information
- Returning of Federal Funds (42 CFR 433)
- Federal Participation (42 CFR)
- History of the RAC Program
- Public Health History & Population Statistics
- Billing Education (Based on RAC audits)
- + More

Have Suggestions? Go to the Stakeholder Comment form and let us know!

Colorado RAC Website & Communications Updates

RAC Website Updates

Complete overhaul of site & contents as of July 26, 2023

Sections created and organized related to:

- The RAC Program
- Resources & Links, including those required by HB23-1295
- Links to HCPF reporting such as the Cost-Shift Analysis reports
- Training
- Stakeholder Engagement
- Provider Advisory Board
- Contact Information (and much more)

Provider Requests & Contact Information

New HCPF RAC Team Emails

- Plans to implement new emails in 3-6 months
- Specific emails are to be utilized for specific requests
- HCPF will send an email blast to providers and update website to inform them of the new email addresses

As a Note: CO RAC HMS Provider Portal is not the same as the interChange (Claims System) Provider Portal

Provider Contact Info in InterChange

- HCPF and HMS get a lot of requests from providers asking us to update their Contact Info
- Per the Provider Agreement, Providers are responsible for maintaining current contact information in InterChange.
- Please use the Provider Web Portal Quick Guides on the HCPF site to update your contact information.

<https://hcpf.colorado.gov/interchange-resources>

Provider Questions & Clarifications on Audits

- HCPF has been receiving emails requesting clarifications and questions on audits.
- We encourage Providers to utilize the Informal Reconsiderations (IR) process to provide:
 - Additional New Documentation
 - A narrative of why you disagree with the findings
 - Upload to the Colorado RAC HMS provider Portal or;
 - Mail all requests to HMS, as indicated on your notice

Informational Memo(s)

HCPF will start to utilize informational memos to communicate:

- Educational Opportunities & Program Clarifications
- Changes within the RAC Program
- If we need to halt an audit to conduct additional research or if there are policy clarifications

If an audit is halted:

- HCPF will notify providers by updating the website and sending out an informational memo
- This will include an explanation and communications regarding next steps, including the expectation for amended letters and a “re-start” of provider rights

By Utilizing Informational & Policy Memos we will not have to grant extension after extension, but rather halt audits and amend notices, as needed

Provider Resources & Utilization of the RAC Vendor

Utilizations of HMS Colorado RAC (Specific) Provider Services

- HMS is the Auditor & should be the primary point of contact

HMS Colorado RAC Provider Portal

- Upload medical records
- Upload Informal Reconsideration requests
- Download all correspondence & spreadsheets
- Track audits

HMS Website with Training and Resources including training on the Colorado RAC HMS Provider Portal

<https://resources.hms.com/state/colorado/rac>

Audit Specific Update: Inpatient Audit Clarifications

Inpatient Reviews & the Rules

Per 10 CCR 2505-10 8.300.12.A.2. regarding inpatient reviews:

“Reviews will be conducted relying on the professional expertise of health professionals, prior experience and professional literature; and nationally accepted evidence-based utilization review screening criteria whenever possible. These criteria shall be used to determine the quality, Medical Necessity and appropriateness of a health care procedure, treatment or service under review.”

The reviews (8.300.12.A.4) are to include reviews of procedures and/or services such as:

- Medical Necessity (HMS not conducting this type of inpatient review)
- Appropriateness of care
- Service authorizations
- Payment reviews
- DRG validations
- Outlier reviews
- Second opinion reviews
- Quality of care reviews (HMS not conducting this type of inpatient review)

RAC Inpatient Audits

Inpatient Audits include:

- Reviewing the full documentation and medical records sent by providers
- Reviewing claims data submitted to HCPF by providers
- Utilizing billing resources such as:
 - Uniform Hospital Discharge Data Set (UHDDS)
 - Inpatient Only lists (CMS and HCPF)
 - APR-DRG (3M)
 - American Medical Association (AMA) medical coding rules, including International Classification of Diseases (ICD)
 - Evidence based Criteria/Guidelines, such as interQual or Milliman (MCG)
 - National Library of Medicine (NLM) & National Institute of Health (NIH) Peer-reviewed publications of national standards of care
 - Health First Colorado rules, such as billing manuals & utilization of correct revenue codes, medical codes, NDCs and claims submission rules

Inpatient Audit Clarifications

Clinical Staff at HMS:

- All Inpatient overpayment determinations are made by either a nurse (RN), a Medical Physician (MD) or by a Medical Director (MD) at HMS
- There is a multi-tier review process where multiple clinical staff review findings prior to sending overpayment letters to HCPF for approval
- The scope of the inpatient reviews is based on billing, not on quality of care
 - Quality of care reviews require peer-to-peer reviews

Medical Billing Resources:

- All resources are also utilized by providers to bill for inpatient services
- All resources used by the Colorado RAC are publicly available

Inpatient Audit Findings:

- No inpatient audit finding is based on software alone
- The audit verifies information such as:
 - What the provider billed vs. medical record documentation
 - If proper coding and billing was done
 - If there was utilization management related to the level of care
 - Intensity of services inpatient vs. outpatient
 - Inpatient only lists & billing practices

Inpatient Audit Update: InterQual vs. MCG

HMS uses InterQual because...

- InterQual was utilized by HCPF & other Contractors at the time we started this Program.

So, what can Providers do if they use MCG?

- Hospitals (at the time they submit their Informal Reconsideration (IR) Requests) can ask HMS to also review the claims based on Milliman (MCG) criteria in addition to interQual.

HMS will still always review all medical records, rebuttals, cover letters and documentation sent by providers in addition to what was billed for the claims under review

- If MCG criteria is met and what was billed matches what is in the medical records, claims will be overturned

Rule Making Updates

Informal Reconsideration Rule-Making Updates

Who Responded?

Number of Responses: 5

- Health First Colorado Providers
- Provider Associations

Summary of Changes:

- New proposed rules in 8.050
- Mandatory IR to allow another opportunity to review claims at issue and engage with the provider to correct any errors and educate the Providers on findings.
- Deadline extended to submit IR from 30 days to 60 days

Informal Reconsideration Rule-Making Updates

Stakeholder Feedback

- In favor the extended IR timeline
- Concerns about the mandatory IR
- Request for extending appeal deadline

HCPF appreciates your feedback on the IR Rule Proposal.

At this time, we are continuing to evaluate changes to this rule & will update once we have considered all the provided feedback.

Upcoming Trainings & Stakeholder Meetings

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HCPF & Gainwell Hosted Beginner Billing Training: Professional Claims (CMS 1500)

Thursday, August 10, 2023
9:00am-11:30am MST

HCPF & Gainwell Hosted Beginner Billing Training: Institutional Claims (UB-04)

Thursday, August 24, 2023
9:00am-11:30am MST

Upcoming Stakeholder Engagement Meetings

- Thursday, November 2, 2023, 12pm-1pm MST
- Thursday, February 1, 2024, 12pm-1pm MST
- Thursday, May 2, 2024, 12pm-1pm MST

[Provider Training | Colorado Department of Health Care Policy & Financing](#)

We Want to Hear From You!

Want RAC Updates?

We have created a form that is utilized by us to send email blasts, flyers, and any communications to Providers. This will ensure quick and efficient information is being communicated while any updates to the website or content are being made.

[Use the form link here if you want to get emails blasts and information about the RAC Program](#)

Want to give us feedback?

We have created a form that is utilized by us to identify common questions, suggestions, or agenda items we need to address at the following stakeholder meeting.

[Use the form link here if you have suggestions, comments, complaints, or questions](#)

Want to be on the RAC Provider Advisory Board?

We also created a form so interested parties can upload their resume/CV to be considered to be on the board. This board is only for Providers. We are looking for a mix of many different provider types, since the RAC audits a few different areas.

[Use the form link here if you would like to be considered for the board](#)

Q & A

Please note, litigation and lawsuit comments & requests will not be addressed in this forum.

Please contact the Attorney General's Office.