Colorado RAC Program Stakeholder

Engagement Meeting

Colorado Department of Health Care Policy & Financing November 13, 2024





Panelists

Recovery Audit Contract External

Colorado RAC Program Director (HMS)

Communications Liaison (HCPF)

Meghan Morhauser, MBA

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Agenda

- RAC Provider Advisory Board
- Audit, Preliminary Reports, & Exit Conference Processes
- Informal Reconsiderations, The HMS Colorado RAC provider Portal & Claims Limits
- RAC Provider Training Opportunities
- Q & A



Tara Wingo, PMP

RAC Provider Advisory Board



Last RAC Provider Advisory Board Meeting for 2024

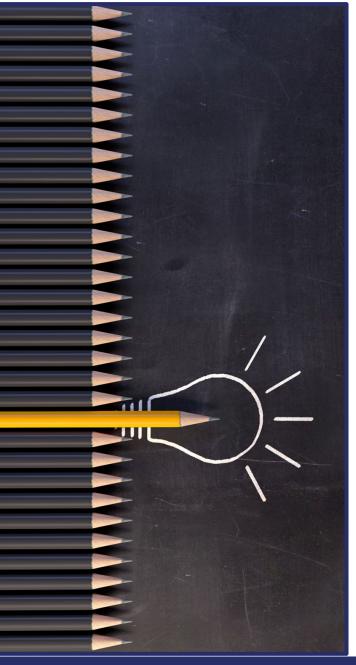


Quarter 4 Thursday, December 12, 2024 8am • Register here in advance

All Board meetings are open to the public for viewing. Registration links can also be located on the <u>HCPF RAC webpage</u>

Any changes to times, dates, or website information will be communicated via email communications, provider bulletins & through associations





2025 Quarterly Meetings Scheduled

Quarter 1 - Thursday, March 20, 2025 1pm

Quarter 2 - Thursday, June 19, 2025 1pm

Quarter 3 - Thursday, September 11, 2025 1pm

Quarter 4 - Thursday, December 11, 2025 1pm

Registration links are available on the RAC website



Reminder: HCPF RAC Webpage Changes: Organization

As a reminder, we have completed HCPF RAC webpage updates to clean up and organize information based on stakeholder feedback

The main webpage now has links to separate HCPF web pages related to:

- The RAC Provider Advisory Board
- <u>The RAC Stakeholder Engagement Information</u>

Click on the new green buttons to toggle between pages





Colorado RAC Legislative Items



A bill has been drafted by the Legislative Audit Committee (LAC) as part of the Office of State Auditor's (OSA) recommendations from the HB23-1295 Evaluation of the RAC program in Colorado

- OSA has reached out to do various stakeholder engagements
- HCPF does not own this bill and will be unable to give the most information about the drafted bill or about stakeholder information
- It has been requested that any comments, suggestions, etc. be sent to OSA via Jenny Page, Director of Communications & Strategic
 Operations at jenny.page@coleg.gov



Audit, Preliminary Reports, & Exit Conference Processes



RAC Audits, Preliminary Findings & Exit Conference Processes

An exit conference is the "exit" of the medical records request phase of an audit, and the entrance into the overpayment demand phase.

Exit Conferences are optional and must be requested by the provider and occur prior to finding letters (Notice of Adverse Action, Overpayment Determination) being mailed, per State Statute C.R.S. 25.5-4-301.

This entire process is outlined on the <u>HMS</u> <u>Colorado RAC Website</u> under "Exit Conference Process (Optional for Providers)".

Colorado RAC Overview New HMS Brandl Resources & Informational Documentation Inpatient Claims Tiers and Limits FXi Hospice Tiers and Limits Physician Administered Drugs Tiers and Limits Exit Conferences Current Automated How to request Previous Limits If an Exit Exit Conf Exit Conference Process (Optional for Providers)



RAC Audits, Preliminary Findings & Exit Conference Processes

Providers who are in a clinical medical records reviews (a.k.a. "complex audits") have the following audit process:

- Step 1: Providers are contacted by the auditor to verify contact information before a medical records request is mailed, per State Statute C.R.S. 25.5-4-301.
- Step 2: Providers will then receive a medical records request letter after the contact information is validated.
 - Providers are given 45 days, from the date on the medical records request letter, to turn in all medical records associated with the claims in the medical records request.
 - It is always pertinent that the provider follow the cover letter instructions on their medical records request letters.
 - All medical records must be provided to the auditor prior to any other part of the audit process.
 - This will mitigate any misunderstandings or recoveries of overpayments due to incomplete records being provided.
 - Providers are encouraged to use the HMS Colorado RAC Provider Portal to submit records electronically to mitigate the risk that any records are lost, submitted late, and to cut the cost and time of mailing in records.



RAC Audits, Preliminary Findings & Exit Conference Processes

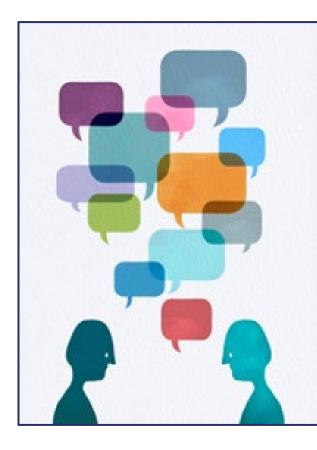


- Step 3: Within 10 days from when the provider receives a medical records request letter, they can ask for a preliminary finding report and an exit conference by contacting <u>HMS Colorado RAC Provider</u> <u>Services at 1-877-640-3419</u>.
 - A preliminary finding report is a document (spreadsheet) that identities all the claims in the medical records request letter and includes the following:
 - All the claims that have been identified as a preliminary overpayment
 - The audit finding including criteria used to evaluate the claims
 - Any claims with no audit findings
 - HMS will not schedule the exit conference prior to the preliminary finding report being available to the provider. This is because there is a chance the audit findings may change since medical records have not yet been received by HMS and reviewed.
- Step 4: HMS will review all the medical records once they receive the records from the provider.
- Step 5 : Once all records are reviewed, HMS will schedule the exit conference. Providers are contacted by HMS once there is a preliminary findings report ready to be issued to the provider.
 - If there are no findings within the audit case, HMS will contact the provider to cancel the exit conference.



The Audit, Preliminary Findings & Exit Conference Processes

- Step 6: HMS will issue a preliminary findings report and an exit conference agenda to the provider five (5) days prior to the exit conference.
- Step 7: The provider reviews the claims in the preliminary findings report and determines whether additional records are needed to validate their position on the claims.
 - This could include multiple missing medical documents including, missing inpatient orders, incomplete medical records or any additional records.
- Step 8: The Exit Conference is conducted by HMS with the provider and should expect that:
 - Exit Conferences will be recorded by HMS.
 - There will be a review of a summary of the claims findings and trends from preliminary findings.
 - There will be a discussion between providers and HMS to answer questions on criteria or standards of care that may impact findings.





The Audit, Preliminary Findings & Exit Conference Processes



- If the provider disagrees with the finding/criteria or standard of care applied to justify the finding, it can be disputed in the Informal Reconsideration process.
 - It is not deliberated within the Exit Conference.
 - Exit Conferences are intended to give providers the opportunity to seek clarity and provide transparency regarding how HMS determines their findings.
- There will also be a review of the number of claims listed with No Findings.



The Audit, Preliminary Findings & Exit Conference Processes

- The exit conference meeting should include, from HMS and the provider, a clinical professional (as needed) and medical billing staff.
- If a provider chooses to discuss specific claims with HMS, they must contact HMS to allow the clinical staff at HMS to be prepared for a clinical or billing discussion, prior to the exit conference.
 - This allows for a discussion where everyone has the same information and where both HMS and the provider have a chance to learn, update findings, or to understand the audit itself.
- Extensions and scheduling can be flexible but must be requested by a provider.
- Step 9 : Per State Rules, upon completion of the Exit Conference, the provider has five (5) business days to upload to the HMS Colorado RAC Provider portal or to mail in additional records or supporting documentation for the claims in preliminary findings report.
- Step 10: HMS reviews any additional documentation within 20 calendar days of receipt.
- Step 11: Formal findings letters (Notice of Adverse Action, Overpayment determination letter) are mailed to providers after HCPF's final approval.

After receiving findings letters, providers can rebill claims that are specific to inpatient vs. outpatient findings or can request an Informal Reconsideration or Appeal.



Informal Reconsiderations, the HMS Colorado RAC Provider Portal, & Claims Limits Resources & Reminders



hms[®] RAC Informal Reconsideration Reminders

- Providers can request an Informal Reconsideration if they want to provide additional information after receiving a Notice of Adverse Action Letter (NOAA) and they disagree with the audit findings
- Informal Reconsideration requests must be received by HMS within 30 days of the date on the NOAA
 - Requests for extensions can be granted
 - $\circ~$ All requests will be reviewed on a case by case basis by HCPF
- Providers should provide a detailed response and additional documentation that supports the billing of the claims that are in the audit findings and their clinical position
- Providers should receive a confirmation call from HMS Provider Services when an Informal Reconsideration request has been received for the claim(s)

Informal Reconsiderations must comply with the Code of Colorado Regulations requirements. Please see 10 C.C.R. 2505-10, Section 8.050.6, Informal Reconsiderations and Appeals of Overpayments Resulting from Review or Audit Findings, for Medicaid rules regarding a request for an Informal Reconsideration



hms[®] RAC Informal Reconsideration Reminders

- HMS recommends submitting Informal Reconsideration requests and any additional documentation to the HMS Colorado RAC Provider Portal
 - This ensures that HMS receives documentation immediately
 - Provider does not have to keep track of Tracking Number from Mail Carriers
 - Providers can identify if there are any issues with attaching the documentation
 - Providers can assure their Informal Reconsiderations were received timely
- If a provider who uses MCG believes that an inpatient stay was valid under MCG criteria and would like HMS to evaluate the claim using MCG this can be done at the Informal Reconsideration stage
 - The provider should specify in the IR Request that they believe MCG criteria was met and cite the specific set of criteria the provider believes was met
- Providers will receive a consolidated letter with the outcome of their informal Reconsideration request within 45 days after HMS receives the request
- The letter will include claims that were overturned and/or upheld



hms[®] Informal Reconsideration Resources

Providers who want more information and training on informal reconsiderations and can use the following online resources:

New Training Opportunity:

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- Colorado RAC "Making the Most of Informal Reconsiderations" Training
 - o <u>1/16/2025 12pm-1pm MST Registration Link</u>
 - o <u>4/10/2025 2pm-3pm MST Registration Link</u>

Existing Training Opportunities & Resources

- HMS RAC 101 Provider Training Slide Deck
- HMS Colorado RAC FAQ
- CO RAC HMS Audit Process
 - <u>Clinical Retrospective Review Process, Hospice (PowerPoint)</u>
 - o Clinical Retrospective Review Process, Hospice (Webinar)
- CO RAC Automated Audit Process
 - <u>RAC Automated Process (PowerPoint)</u>
- CO RAC Complex Audit Process
 - <u>RAC Complex Process (PowerPoint)</u>

As a reminder, live training dates are located on the <u>HMS</u> & <u>HCPF RAC</u> websites and at the end of this presentation



hms[®] RAC Provider Portal Resources & Updates

As a reminder, providers can get more information and resources from this portal, including published HMS RAC Portal trainings. HCPF will create quick guides for routine requests from providers.

In the portal providers can:

- Access all Providers in your network
- Review all letters
- Find specific letters and claims quickly utilizing the search functions
- Filter out all letters that need medical records without having to sort through paper copies
- Attach medical records and documentation immediately to claims
- Track the status of claims in a RAC audit
- Communicate with HMS RAC provider services
- Update your mailing address and contact information
- Access reports that export to excel to make them easier to filter and sort
- View reporting through the new Provider Scorecards

Links to resources for the HMS Colorado Portal are covered in the slides below and on the HMS & HCPF RAC webpages



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Letters Paym	ent Integrity			d d	aim Export Report
Filters	© 1454 Total Letters		Search by Letter Reference Number, Provider Name, Provide	er Number	Q Sort
Letters					
Colorado (1454)	* "Dispute" means any rebuttal, response, appe	al or request for reconsideration from the Provider in	response to the HMS overpayment finding.		
Letter Type	Provider Name & No. Provider name Provider number	Sent Date Oct 31, 2024	Letter Type Medical Record Request Notification	Claims 50 View Claims	1
Combined Uphold- Overturn Notification (218)	Client (326) CDHCPF	Letter Reference Number 1234567-12			
 Dispute Overturn Notification (34) Medical Record Request Notification (550) No Further Action Required Notification (47) 	Provider Name & No. Provider name Provider number Client (326) CDHCPF	Sent Date Oct 31, 2024 Letter Reference Number 1234567-13	Letter Type Medical Record Request Notification	Claims 1 View Claims	ł
Overpayment Notification (592) Rebuttal No Action (1)	Provider Name & No. Provider name Provider number	Sent Date Oct 31, 2024	Letter Type Medical Record Request Notification	Claims 25 View Claims	1
	Client (326) CDHCPF	Letter Reference Number 1234567-14			

Step 1: Select letters from the left toolbar

Step 2: On the upper right click "Claim Export Report"



Colorado RAC Provider Portal (continued)

Claim Export Report							
Provider Number							
Search & Add Multiple Providers by Provider Number, Federal Tax ID or NPI							
From Date *		To Date *					
month/day/year		month/day/year É					
			t				
		Cancel	Download				

Step 3: Select up to 3 providers that you would like to export data for

Step 4: Enter date range you want to export and click "Download"



hms[®] HMS Colorado RAC Provider Portal Resources

Providers who want more information and training on the HMS Colorado RAC Provider Portal can use the following online resources:

- HMS Colorado RAC Provider Portal Training Video
- HMS Provider Portal Training Guide
- HMS Provider Portal Scorecard Training
- HMS Provider Portal Link New Users Click Here

As a reminder, live training dates are located on the <u>HMS</u> & <u>HCPF RAC</u> websites and at the end of this presentation





RAC Provider Training Opportunities



Colorado Provider Training Opportunities

HMS Colorado RAC Training:

CO RAC 101 Complex Training

Tuesday, December 10, 2024 2:30pm-3:30pm MST

CO RAC 101 Automated Training

Tuesday, November 19, 2024 11am-12pm MST

HMS RAC trainings are scheduled monthly and always available online at your convenience on the <u>HMS Colorado RAC Website</u>

HCPF Provider Billing Training:

Beginner Billing: Professional Claims (CMS1500) Thursday, November 14, 2024 9:00am-11:30am MST

Provider Billing Training is scheduled monthly. Registration and information can be found on the <u>HCPF Provider Resources webpage</u>



Colorado Provider Training Opportunities

HMS Colorado RAC Training:

- CO RAC Rebilling/Scorecard Training
 - <u>11/14/2024 12pm-1pm MST Registration Link</u>
 - <u>2/11/2025 2pm-3pm MST Registration Link</u>
 - 5/13/2025 10am-11am MST Registration Link
- CO RAC Mailing Limits Training
 - <u>12/17/2024 2pm-3pm MST Registration Link</u>
 - <u>3/20/2025 10am-11am MST Registration Link</u>
 - <u>6/11/2025 3pm-4pm MST Registration Link</u>
- CO RAC Making the Most of Informal Reconsiderations Training
 - <u>1/16/2025 12pm-1pm MST Registration Link</u>
 - <u>4/10/2025 2pm-3pm MST Registration Link</u>



HCPF Provider Resources

Medicaid claims billing training:

- HCPF claims billing training
- Provider quick guides

Claims denials, client eligibility, provider enrollment and billing questions:

• Gainwell Provider Services (Not HMS): 1-844-235-2387 (M-F 7:00 a.m. - 5:00 p.m.)

Policy and Benefits Clarifications:

- Provider Billing Manuals
- Provider Bulletins
 - > Policy/Program Staff are listed in the billing manuals and bulletins (online)

Help from <u>HCPF Provider Field Representatives</u>:

- Technical assistance for the Provider Web Portal
- Provider enrollment
- Billing and claims
- Electronic Data Interchange
- Understanding and reconciling the remittance advice





Upcoming Colorado RAC Stakeholder Meetings

RAC Stakeholder Meetings

- Wednesday, February 12, 2025 12pm-1pm MST
- Wednesday, May 14, 2025 12pm-1pm MST
- Wednesday, August 13, 2025 12pm-1pm MST



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