

HCPF Management Evaluation Review Program

August 28, 2020



COLORADO

Department of Health Care
Policy & Financing

Agenda

- What is the HCPF ME Review Program?
- Why?
- Different Modules of the Review
- The ME Review Process
- Improvement Action Plans
- Corrective Action Plans
- Ongoing monitoring
- Feedback Session



COLORADO

Department of Health Care
Policy & Financing

What is the Management Evaluation Review Program?

- The Management Evaluation (ME) Review Program currently exists for economic security programs at the Colorado Department of Human Services
- The HCPF ME Review Program will duplicate the process, but add other areas of oversight, compliance and technical support
- Both counties and Medical Assistance Sites will participate in the ME Review Program



COLORADO

Department of Health Care
Policy & Financing

Why the ME Review Program?

- Consistent way to ensure oversight across different HCPF program areas
- Replaces certain components of the Medical Eligibility Quality Improvement Plan (MEQIP)
- Standardizes implementation and monitoring of corrective actions
- **MOST IMPORTANT:** better support eligibility site with in-person technical assistance and partnership to address performance, quality and member experience



COLORADO

Department of Health Care
Policy & Financing

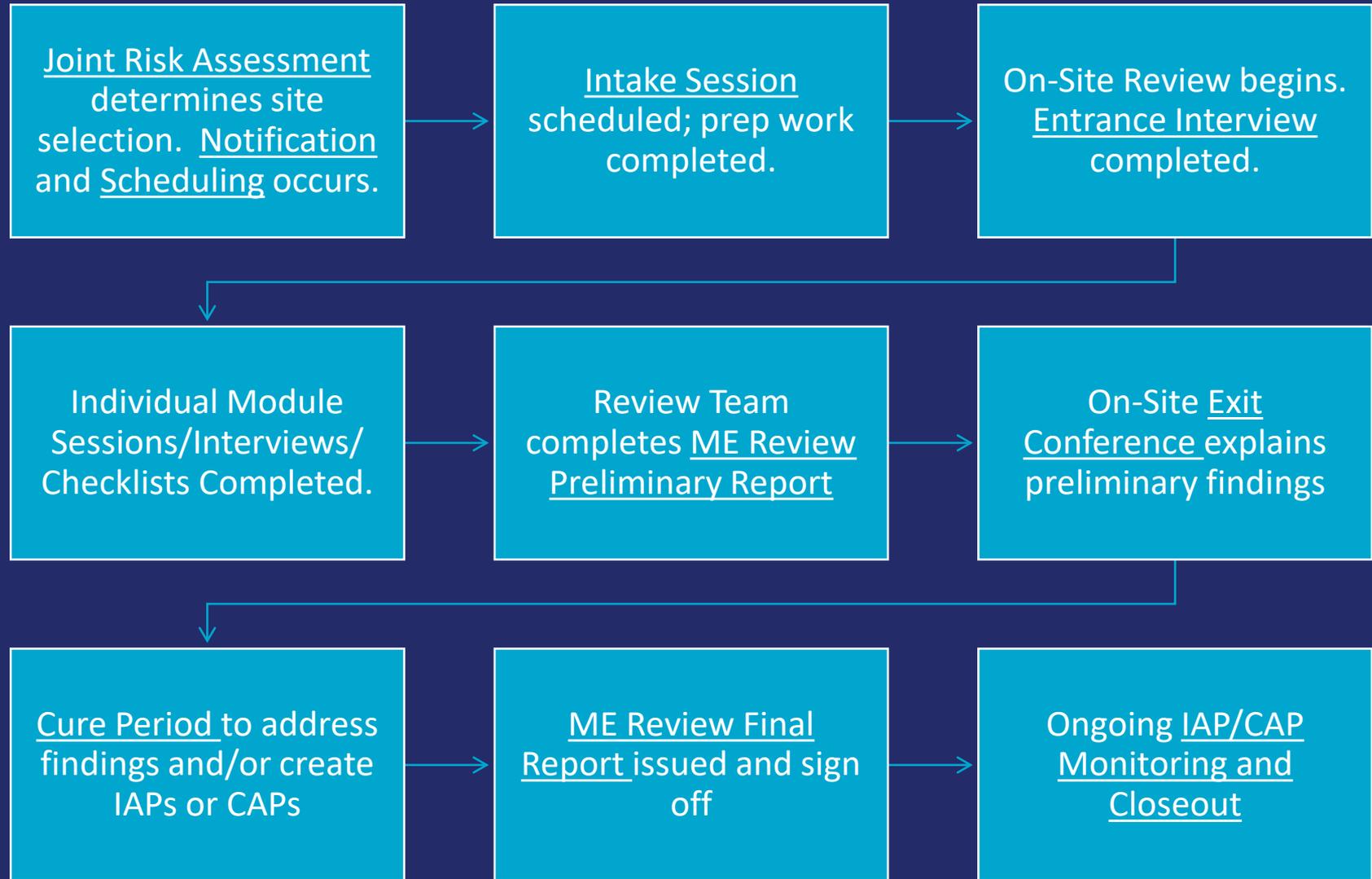
Different Modules

- Within the ME Review Program, different “modules” will address compliance and technical assistance from different program areas across HCPF
- Modules will include quantitative compliance review and qualitative review

Eligibility Determination	Administration
Fiscal	Ongoing Case Maintenance
Member Fraud	Member Experience
Customer Service	Hearings and Appeals
Quality Assurance	Performance Management



The ME Review Process



How are sites selected for review?

- Joint Risk Assessment determines which sites are selected for review
- Risk Assessment is a process within subrecipient monitoring that determines which subrecipient requires additional monitoring due to risk scores
- In the JRA process, risk is determined based on: fiscal and subrecipient monitoring, eligibility determinations, quality, performance measures, contract performance and site-specific risk



COLORADO

Department of Health Care
Policy & Financing

Notification and Scheduling

- 24 total eligibility sites selected on annual basis from Joint Risk Assessment
- Sites selected will be notified directly as well as through Informational Memo
- Scheduling will occur by grouping cohorts of sites, such as by region, overnight vs. day trips, winter travel, etc.
- Top priority will be to give flexibility within cohorts to find dates that work for every eligibility site selected



COLORADO

Department of Health Care
Policy & Financing

Intake Session

- Intake session will be scheduled at least 30 days before with the eligibility site staff responsible for coordinating the onsite review and include discussions on:
 - Explaining the HCPF ME Review Program process and expectations
 - Providing the eligibility site any necessary documentation to complete, if applicable
 - Collecting documentation for review prior to site visit
 - Scheduling Entrance Interview and Exit Conference, individual module sessions and specific compliance checks, including interviews with leadership and staff



COLORADO

Department of Health Care
Policy & Financing

Entrance Interview

- The Entrance Interview is the first onsite meeting conducted and kicks off the rest of the review
- State and county staff will be introduced
- The HCPF ME Review Program process will be explained
- Agenda will be shared based on Intake Session



COLORADO

Department of Health Care
Policy & Financing

Completing Modules

- Once the Entrance Interview is completed, different breakout sessions will occur, based on the agreed-upon schedule
- Qualitative Reviews/Interviews will occur at the times that work for the eligibility site
- Quantitative Reviews/Compliance Checks will occur during the times where Interviews are not scheduled
- ASK: if possible, the eligibility site can



COLORADO

Department of Health Care
Policy & Financing

Difference between Quantitative and Qualitative Reviews

- Each module in the ME Review will include either a quantitative compliance review, a qualitative review or both
- Quantitative compliance review will determine whether sites are following certain federal/state regulations, rules and guidance
- Qualitative review is like an “interview” with certain staff that will be used to determine whether technical assistance is needed



COLORADO

Department of Health Care
Policy & Financing

Quantitative Compliance Reviews

- Compliance Reviews will be conducted off a Compliance Checklist
- Compliance Review will always have a citation associated with the check - basically, a rule that must be followed
- The answer to the check will either be "In Compliance" or "Not in Compliance"
- Non-compliance can trigger either an Improvement Action or Corrective Action Plan
- Following examples are draft questions



COLORADO

Department of Health Care
Policy & Financing

Example: Quantitative Compliance Review, Hearings and Appeals

Applicant/recipient requests for dispute resolutions (received within 60 days of the Notice of Action) must be reviewed and notifications sent in writing with a date, time, and location for a conference within 10 calendar days of receiving the request.

10 CCR 2505-10 8.057.3.F(2)

Conferences are held within 25 calendar days of the County/service agency receiving the request (unless mutually agreed upon otherwise), and they occur by phone or in person.

10 CCR 2505-10 8.057.3.F(3) and (4)

Records of the conference are maintained and made available for review when needed in a State Department/Agency hearing.

42 CFR 431.233(a)



COLORADO

Department of Health Care
Policy & Financing

Example: Quantitative Compliance Review, Confidentiality

Protected health information (PHI) is used only for proper, administrative purposes (e.g. enrollment, eligibility determination), and usage does not violate the privacy rule.

HCPF Agency Letter 03-008(1)

A written set of policies and procedures concerning privacy and safeguarding PHI from intentional or unintentional use are in place.

HCPF Agency Letter 03-008(3)

In accordance with the privacy rule, only the minimum amount of PHI is requested, used, and disclosed to complete necessary duties.

HCPF Agency Letter 03-008(10)



COLORADO

Department of Health Care
Policy & Financing

Qualitative Reviews

- Qualitative Reviews will be conducted off a Qualitative Checklist, with different questions based on module
- The Qualitative Review may or may not have a citation, but will not be recorded as a compliance item
- Basically, these are questions to make sure sites have a common understanding of certain rules, processes and procedures
- May trigger an Improvement Action Plan, but not Corrective Action Plans.



COLORADO

Department of Health Care
Policy & Financing

Example: Qualitative Review, Eligibility Determination

What reports do you work or utilize to manage new applications and ensure timeliness and accuracy?

Note: COGNOS reports

What are the eligibility site requirements for using case comments?

What steps are taken if they are not used?

How is this addressed with staff?

How is your case comment template aligned with federal and state requirements for Medical Assistance eligibility?

What is the expectation of workers to use automated interfaces? Are workers encouraged to utilize electronic interfaces rather than requesting documentation from the member?

How does the eligibility site encourage workers to accept electronic interfaces instead of requiring documentation from the member?

How is the use of electronic interfaces documented?



COLORADO

Department of Health Care
Policy & Financing

Example: Qualitative Review, Quality Assurance

HCPF Quality Assurance Program

How are eligibility site staff trained on HCPF quality assurance programs? What are eligibility site processes concerning the request of case files and timeliness requirements? Does HCPF have access to the eligibility site's internal electronic document management system? What is the eligibility site's process for case file requests?

HCPF Quality Assurance Forms and Rebuttals

How are the necessary eligibility site staff trained on the use of HCPF QA case review tools and forms? How are eligibility site staff trained on the rebuttal process for findings received? What is the eligibility site's process for handling QA findings and rebuttals?

HCPF Quality Assurance Findings

How are HCPF QA findings documented and shared with the individual responsible for those findings? What role do supervisors play in addressing and preventing those errors with the specific individual?

How are HCPF QA findings documented and shared with all individuals responsible for Medical Assistance? How does the eligibility site ensure findings are addressed systemically? What role do supervisors play in addressing and preventing those errors systemically across individuals?



COLORADO

Department of Health Care
Policy & Financing

Staff Development Center

- The Staff Development Center will participate in the HCPF ME Reviews
- Will follow the existing process that is used for CDHS ME Reviews for cash programs
- Will focus on monitoring staff training and following up on certified trainer status at eligibility site
- Important to ensure accuracy of users in Learning Management System and that CBMS users with Medical Assistance access are properly trained



COLORADO

Department of Health Care
Policy & Financing

ME Review Preliminary Report

- Once all the quantitative and qualitative reviews are completed for all modules, the ME Review team will prepare a preliminary report and will share on-site during exit interview
- Report will address issues of non-compliance and recommendations for Improvement Action or Corrective Action Plans, recommendations from qualitative reviews for process/practice adjustment
- Eligibility site and HCPF will sign off on preliminary report



COLORADO

Department of Health Care
Policy & Financing

Preparing for ME Review Final Report

- Once the ME Review Preliminary Report is issued, the eligibility site will prepare for the ME Review Final Report by:
 - Preparing any formal Improvement Action or Corrective Action Plans for submission in the final report
 - Addressing individual or systemic compliance



COLORADO

Department of Health Care
Policy & Financing

Cure Period

- If ME Review Preliminary Report is issued with recommendations for Corrective Action Plans, eligibility site has 30 calendar day “Cure Period” where the site can address issues of non-compliance before being required to implement formal Corrective Action Plan
- Final ME Review Report will reflect the initial non-compliance and that the issue had been cured



COLORADO

Department of Health Care
Policy & Financing

ME Review Final Report

- Once the 30 calendar day clock is complete, the ME Review Final Report is prepared based on documentation submitted by the eligibility site
- Any Improvement Action or Corrective Action Plans submitted will be reviewed and approved before completing the final report
 - This may cause delay in completion of the final report if corrections/adjustments needed on any Plans submitted
- The ME Review Final Report will then be signed by the eligibility site and HCPF, indicating completion of the report



COLORADO

Department of Health Care
Policy & Financing

Improvement Action Plans

- Improvement Action Plans (IAPs) are informal plans created by the eligibility site to address compliance, performance, quality or other issues found during oversight
- May or may not be tied to a specific citation
- Should address both individual and systemic root causes, if applicable
- Can be proactive plans to increase performance before a Corrective Action Plan is triggered
- Tracked and monitored by HCPF and formally reported



COLORADO

Department of Health Care
Policy & Financing

Corrective Action Plans

- Corrective Action Plans (CAPs) are formal plans created by the eligibility site to address compliance, performance, quality or other issues found during oversight
- Tied to a specific rule or citation, or performance and/or quality measures
- Should address both individual and systemic root causes, if applicable
- CAPs tied to the process that will be formalized in County Administration rules
- Tracked and monitored by HCPF, formally reported on dashboard



COLORADO

Department of Health Care
Policy & Financing

Monitoring of IAPs/CAPs

- Any IAPs or CAPs that are implemented during ME Review or regular monitoring will be tracked internally and reported to eligibility sites
- HCPF may follow up with eligibility sites on progress towards completing IAPs/CAPs
- Documentation may be required to closeout IAPs or CAPs, depending on the situation
- Additional steps taken when insufficient progress has been made towards completing or closing out any plans



COLORADO

Department of Health Care
Policy & Financing

Hold Harmless Policy

- As additional federal and state regulations, rules and guidance is promulgated, HCPF may add additional compliance checks in the ME Reviews
- Or, existing compliance check may be modified based on feedback, practice, or outside requirements
- If compliance check is added or modified within 60 days prior to an ME Review being conducted, non-compliance will trigger IAP instead of CAP
- Allows time to gain compliance before formal CAP process initiated



COLORADO

Department of Health Care
Policy & Financing

Proactive Monitoring - Performance Improvement

- Using selected eligibility performance measures, the Performance Improvement Team (PIT) monitors all eligibility sites hitting targets, moving away from targets, or making substantial movement toward targets.
- Sites not making substantial movement toward or consistently hitting targets will be contacted by PIT and will be offered support and assistance.
- These performance measures are the same being fed into the JRA and aim to reduce 'risk'.



COLORADO

Department of Health Care
Policy & Financing

Administrative Desk Reviews

- In addition to HCPF ME Reviews, we'll also be implementing new Administrative Desk Reviews
- These would occur on a quarterly basis and would collect documentation for review from all 64 counties (MA Sites would follow their contractual process)
- They would look at things like HIPAA compliance policies, Customer Complaints, Cybersecurity Standards, Continuity of Operations Plans, etc.
- Operational Memo will explain process, timeframes and what's being reviewed
- Start later in 2020



COLORADO

Department of Health Care
Policy & Financing

Feedback Session

- We need to hear from you!
- Did you identify something in the process that can cause problems in completing the ME Review?
- Are there specific areas that you struggle with that you'd like to see included in the Qualitative Reviews/Interviews?
- What's missing? What needs to be added?
- Do you have general feedback?





Questions?



Co-Chairs Contact Info

Want to provide feedback or recommendations?
Contact one of your county or MA Site co-chairs!

Lucy Ellsworth (Adams County)

Email: l Ellsworth@adcogov.org

Bernadette O'Keefe (Pueblo County)

Email: bernadette.okeefe@pueblocounty.us

Gretchen Trimm (MA Sites)

Email: gretchen@expresseligibilityconnections.com

Quinesta Barnes (MA Sites)

Email: qbarnes@c4hco.com



COLORADO

Department of Health Care
Policy & Financing

Thank you!



COLORADO

Department of Health Care
Policy & Financing