

RAC Program Stakeholder Engagement Meeting

Colorado Department of Health Care Policy & Financing
May 2, 2024

Panelists



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Department of Health Care
Policy & Financing

Agenda



Bart H. Armstrong, Esq.

Fraud, Waste, and Abuse Division Director

Alyssa M. Gilger, CSSBB

Recovery Audit Contract Program Section Manager

Prismar N. Perez

Contract Audit Operations (CAO) Unit Supervisor

Meghan Morhauser, MBA

Recovery Audit Contract External Communications
Liaison

Lydia Clark

Recovery Audit Contract Contingency-Based Contract
Manager and Fiscal Specialist

Chantal Kalisch

Colorado RAC Senior Program Manager (HMS)

- Stakeholder Engagement: A Year in Review
- RAC Provider Advisory Board
- RAC Audit Updates
- Upcoming Training Opportunities
- Q & A



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RAC Stakeholder Engagement: A Year in Review



First: New Changes to Stakeholder Engagement



Feedback was given & we appreciate it

What we are changing today:

- Open Q&A for all to see (live)
- Publishing of Q&A
 - Even if we provide generic answers today, we will document links, laws, rules, & content so everyone has the same information, so it's not "generic" but specific for you
- Publishing (retroactively) recordings of the engagement meetings already completed

We Agree:

- You should feel like you are heard
- We should document and be clear about rules and outcomes based on your comments & questions (everyone has the same info)
- If people cannot attend - they should have the same information & resources

Upcoming HCPF RAC Stakeholder Webpage Changes

We received feedback on our website and are updating HCPF RAC Program website for stakeholder engagements as follows:

- Creating a specific webpage dedicated to RAC stakeholder engagement
 - This is in alignment with other areas of HCPF

The following items will be moved (linked to main RAC page)

- Stakeholder agendas
- Email communications
- Follow up stakeholder items
- Registration Information

The main RAC webpage will contain:

- RAC program rules
- RAC national and state resources and information
- RAC and HCPF training
- Audit information & Contact information





RAC Stakeholder Engagements Started in May 2023

We are officially a year old!

Accomplishments based on HCPF, HMS & Provider Collaboration:

- Updates to communications
- Resources provided for education and clarification of rules and processes
- Increased attendance for RAC training
- RAC provider advisory board member selections & meetings
- Publishing of:
 - Active audits
 - Communications & Memos
 - RAC contract
 - Resources for providers and stakeholders

RAC Stakeholder Engagements: A Year in Review



What we Covered this Year

- Hospital rules
- Communications forms, website updates and enhancements based on feedback (we are currently cleaning up all information so it is meaningful & updated communications forms)
- Email blast communications and memos
- Rebilling pilot & claims system programming
- RAC Program responsibilities
- Educational opportunities
- The Audit process
- Informal reconsiderations
- HMS RAC Provider Portal
- Self disclosures
- Payment timelines and requests
- Continued enhancements and RAC projects updates



RAC Provider Advisory Board

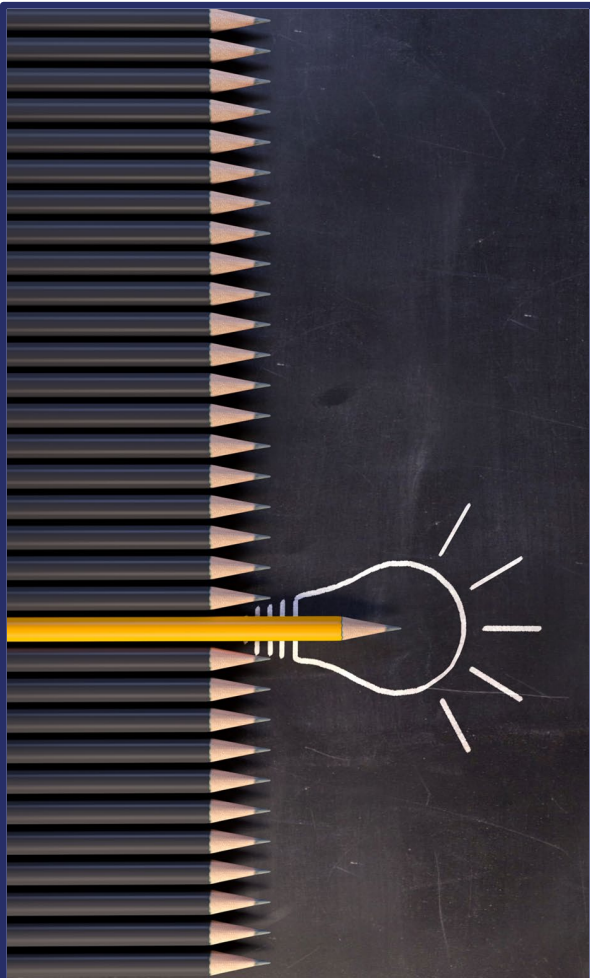


RAC Provider Advisory Board Meeting Recap

What we covered:

- Introductions
- Rules of governance
- Strategic building of the board
- Potential participation in:
 - Review of audit projects
 - Program enhancements
 - Feedback & pain points and related solutions

To review the agendas for the RAC Provider Advisory Board meeting visit the [HCPF RAC Website](#)



Upcoming Agenda Items

Requested agenda items:

- A presentation of the audit process (high-level overview)
 - HMS will prepare this before the next board meeting
 - The process will be reviewed & discussed
- Quarterly activity reporting:
 - Accessible to review at the next meeting
 - Discussion on content and what providers need

If you would like to suggest RAC advisory board agenda items, please submit suggestions to our communications team via the

[RAC Provider Communications form](#)



RAC Provider Advisory Board Website

We received feedback on our website and are updating the advisory board information as follows:

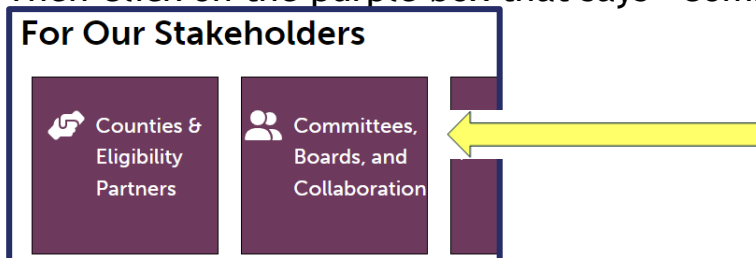
- HCPF has a separate webpage for the [all boards and committees](#)
- The RAC webpage will link to the advisory board webpage, separate from the main RAC page
- This will allow for a cleaner look and an easily accessible area to update all advisory board communications for RAC

To review all HCPF committees and boards & where our page will be located:

1. On the [HCPF website](#) click on “For Our Stakeholders” on the blue bar at the top of the webpage



1. Then Click on the purple box that says “Committees, Boards, and Collaboration”



Upcoming RAC Provider Advisory Board Meetings for 2024



Quarter 2 - Thursday, June 27, 2024 1pm

- Register here in advance

Quarter 3 - Thursday, August 22, 2024 1pm

- Register here in advance

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 [HCPF RAC webpage](#)

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

RAC Audit Updates



NCCI Professional Claims Automated Audit: Wheelchair Benefit Coverage



Audit updated to exclude audit findings for allowable wheelchair backups & accessories

Providers can expect to see refunds for any payments related to this audit, or updated notices with these claims excluded.

For Benefit Coverage, please refer to HCPF Provider Manuals:

- [Durable Medical Equipment HCPCs Codes](#)
- [Wheelchair Benefit Coverage Policy](#)
- [Durable Medical Equipment, Prosthetics, Orthotics & Supplies](#)

All billing manuals linked above are available online at:
<https://hcpf.colorado.gov/billing-manuals>

NCCI Professional Claims Automated Audit: Incontinence Supplies



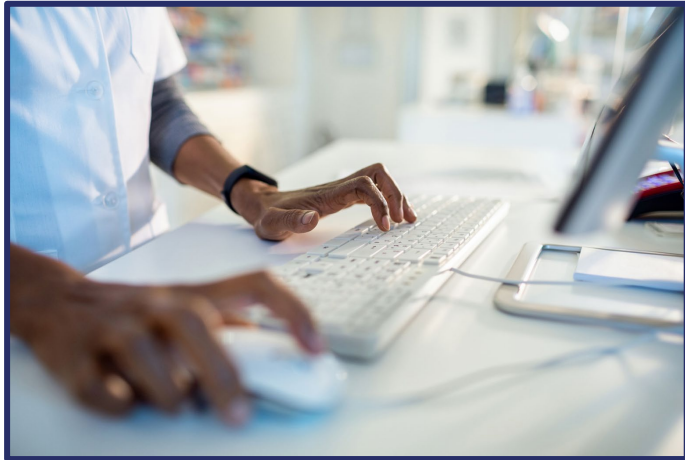
Audit updated to exclude findings where incontinence supplies provided to a Health First Colorado client were ordered in multiple sizes

For Benefit Coverage, please refer to HCPF Provider Manuals:

- [Durable Medical Equipment HCPCs Codes](#)
- [Durable Medical Equipment, Prosthetics, Orthotics & Supplies](#)

All billing manuals linked above are available online at:
<https://hcpf.colorado.gov/billing-manuals>

Inpatient Complex Audits



Inpatient audit initial demands/notices
have been paused

What Providers can expect:

- Informal Reconsideration have a statute timeline - we cannot halt
 - 30 days to request
 - 45 days for HCPF/HMS response
- Appeals have a statute timeline - we cannot halt
 - 30 days to file a formal appeal with the Office of Administrative Courts (OAC)
- Record requests and exit conferences will continue

Temporary Inpatient Audit Pause

These changes are designed to:

- Preserve your (provider) rights to informal reconsideration and formal appeal
- Preserve the state's responsibilities for oversight of improper payments to the Federal government
 - Improper payment measurements:
 - When we (HCPF - CO State) are above the 3% Federally mandated threshold in statute from all areas of Medicaid, this can result in general funds being used to repay the federal government for improper payments
 - Nationally Medicaid has an improper payment rate of 24%
 - Colorado Medicaid has an 12% - we are doing better than most, but general funds are at risk that could be use for other areas (rates/increased benefits)
 - The RAC is meant to identify improper payments, lessening or eliminating the decrease in general funds
 - All RAC recoveries are returned to the general medical services line
 - This increases access to care through better payments for benefits to providers or more broad coverage, because we can afford to offer those benefits

Overall, this means more funds for benefit coverage for rates, behavioral health, autism support, and in general it is a healthier Colorado overall



Inpatient Rebilling Updates

- We have found a semi-automated process to re-bill, however, we are still testing the system with a smaller population of providers
- Inpatient audits are paused in part to update notices with the re-billing option, the process, and to create training around this change
- Once notices (letters) are updated and rebilling is in place the inpatient initial demands/notices will be resumed

Thank you for your patience while we reprogram the claims system, listen to participants in the pilot, formalize the instructions and quick guides.

The ultimate goal is to have safe guards in place and reporting. We also need to have a formal process everyone understands prior to initiating changes.

You should understand the process & changes too



Understanding Rebilling Inpatient Claims

Inpatient Audits are Not just Inpatient vs. Outpatient

Colorado Complex Inpatient RAC Audits currently include 60+ findings which are reviewed by both RNs (Master RN Degrees, pediatric, trauma, and psych specialties +) & MDs in multi levels, and are not solely software driven audits. These audits include medical billing errors including many repriced or full takebacks based on:

- Cancelled Surgery (no services for inpatient procedures were ever rendered)
- DRG coding errors (primary diagnosis - DRG upcoding errors)
- Outpatient orders that superseded inpatient orders (no inpatient services rendered, no federally required inpatient order)
- Clinical validation (secondary and tertiary diagnosis codes - - DRG upcoding errors)
- Technical denials - No records were ever given
- Incomplete records (nurse records are so important)



Accreditations for a RAC (Program Integrity) Vendor

URAC accreditation is standard & our vendor maintains this credential which requires staffing of highly qualified staff



Accreditation Details

Health Management Systems, Inc.

Independent Review Organization: External Review 5.2

ORGANIZATION

Health Management Systems, Inc.
5615 High Point Drive
Irving, TX 75038

ACCREDITED SITES

HMS
5615 high point drive, #100
irving, TX 75038

ACCREDITATION INFORMATION

Accreditation Status: Full Accreditation
Expiration Date: 05/01/2024
Program: Independent Review Organization: External
Review 5.2



1220 L Street NW
Suite 900, Washington, DC 20005



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Provider Training Opportunities



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 [HCPF Provider Field Representatives](#):

- 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

- Thursday, August 1, 2024 12pm-1pm MST
- Wednesday, November 13, 2024 12pm-1pm MST
- 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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Upcoming May 2024 HMS Colorado RAC Training

Colorado Complex RAC Audits currently include:

- Inpatient RAC Audits
- Physician Administered Drugs and Enterals RAC Audits
- Hospice RAC Audits

When: Wednesday, May 15, 2024 11am-12pm MST

HMS Colorado RAC 101: Complex Audit training includes:

- Timelines of a complex audit
- Exit conference expectations
- Provider rights and responsibilities
- Utilizing the HMS Colorado RAC Provider Portal (not InterChange)
- Who to contact for issues, updates or for more information

Colorado Provider Training Opportunities

HMS Colorado RAC Training: Complex Colorado RAC Audit Training

- Wednesday, May 15, 2024 11am-12pm MST

Complex Hospice RAC Audit Training

- Tuesday, June 18, 2024 2pm-3pm MST

HMS RAC trainings are scheduled monthly and always available online at your convenience on the [HMS Colorado RAC Website](#)

HCPF Provider Billing Training: Beginner Billing: Institutional Claims

- Thursday, May 2, 2024 1:30pm-3:30pm MST

Intermediate Billing

- Thursday, May 9, 2024 9:00am-11:00am MST

Provider Billing Training is scheduled monthly and registration and information can be found on the [HCPF Provider Resources webpage](#)





Q & A

