

RAC Program Stakeholder Engagement Meeting

Colorado Department of Health Care Policy & Financing

November 2, 2023

HCPF Panelists

Bart Armstrong, Fraud, Waste, and Abuse
Division Director

Alyssa Gilger, Recovery Audit Contract Section
Manager

Prismar Perez, Contract Audit Operations Unit
Lead

Sarah Geduldig, Provider Integrity Section
Manager

Meghan DeLisle, RAC External Communications
Liaison

Lydia Clark, Contingency-Based Contract Manager
and Fiscal Specialist

Agenda

- HB23-1295 Updates
- Inpatient Rebilling Pilot Program
- Audit Findings and Informal Reconsiderations Submissions
- Self Disclosures
- RAC Audits and Communications Updates
- Upcoming Training Opportunities
- Q & A

House Bill HB23-1295 Updates

Bart Armstrong

Office of the State Auditor (OSA) Contract

OSA Contractor: BerryDunn

Colorado Providers will need to click on the survey link to complete the survey

- The online form survey can be accessed [here](#).
- This should take between 15 - 20 minutes to complete

In order to ensure there is an ethical and unbiased evaluation of the RAC Program, all responses to this survey will be anonymous and will be submitted directly to the OSA vendor, BerryDunn. Neither HCPF nor HMS will have access to the survey responses.

An email blast was sent out prior to the meeting today with detailed information and the link. The same information will be available on the RAC HCPF website as well.

HMS Website Updates: Tiers and Limits

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

HMS has updated the website with the following tiers & claims limits:

- Inpatient (complex medical records review)
- Hospice Medical Records (complex medical records review)
- Physician Administered Drugs & Enteral (complex medical records review)
- Automated
- Previous Limits

HMS Website Updates: All Active Audits

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

HMS has updated the website with the following reporting:

- Automated Scenarios
 - All approved automated (data) audits for the RAC program in Colorado
- Complex Scenarios
 - All approved complex medical records reviews for the RAC program in Colorado

HCPF Website Updates

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

Updates

- Close out of forms/links related to:
 - Rebilling Pilot Program
 - Provider Advisory Board
- Email blasts reference
- Program update memos
- Other areas related to basic content

Upcoming Content

- Updates to reporting are being programmed
- HCPF is working with HMS to address reporting related to provider suggestions and needs
- HCPF is working to mirror the resources HMS has provided on the website

RAC Program Advisory Board Members

Metro & Rural Hospital Members

- Dr. David Braun, MD, Banner Health
- Shana Steckler, Denver Health
- Kathryn A. Zeller, UCHealth
- Michelle Gay, San Luis Valley (SLV) Health

***Independent/Unaffiliated Physician Member being confirmed and will be announced*

Durable Medical Equipment Member

- Jennifer Wilmington, Columbine Medical Equipment

Radiology Member

- Lydia Holmes, Invision Sally Jobe

Home Health, LTC, SNF, HCBS & Hospice Members

- Kristen Wildrop, Nursing & Therapy Services of Colorado, Inc.
- Jan Arnott, RN, Home Health & Hospice

RAC Program Advisory Board Members

HCPF Board Members

- Prismar Perez, Contractor Audit Operations Unit Lead (RAC)
- Alex Weichselbaum, Primary & Ancillary Care Section Manager (Policy)

HMS Board Member

- Chantel Kalisch, HMS Colorado RAC Program Manager

Attendees may include other representatives as needed or requested by the Board.

Inpatient Rebilling Pilot Program

Alyssa Gilger

Inpatient Rebilling Pilot Program Participants

Project Managers & Project Oversight

- Alyssa Gilger, HCPF
- Tara Wingo, HMS

Subject Matter Experts (Billers) Hospital Participants

- UHealth
- Denver Health
- Intermountain Health (SCL)
- Boulder Community Health
- HCA/HealthOne
- Children's Hospital Colorado (CHCO)

Inpatient Rebilling Pilot Program Updates

Still in Progress

- Programming of Claims System and Reporting
- Scheduling for final project scope overview

Finalized

- Project Charter
- Project Scope
- Programming agreement with MMIS vendor
- Rebilling Instructions (phase 2 - not automated)

We are experiencing delays with programming for the final phase but will publish RAC program updates throughout the process.

Audit Findings and Informal Reconsiderations (IRs) Submissions

Prismar Perez

Documenting Refutation with Audit Findings

We understand questions arise during an audit. To best document your concern and to provide you rights to contest audit findings

- Submit an informal reconsideration (IR)
- Sent in samples or documentation to substantiate your position
- HMS will review your documentation
- HCPF reviews all IRs and has oversight and records/documentation for each case prior to our approval
- This allows HMS to review everything specific to your case

As a reminder IR submissions may include:

- Additional New Documentation
- A narrative of why you disagree with the findings

Options for Submitting an Informal Reconsideration

Per your notice, you can:

- Use the HMS Colorado RAC Provider Portal
 - Immediate upload
 - Immediate receipt to HMS & HCPF
 - Removes any issues with delivery service (UPS, FedEx, USPS)
 - Gives you control and visibility:
 - Immediate access to Notices
 - Reporting flexibility in Excel
 - Audit tracking
- Mail in documentation to HMS (TX Address per Notice)
- Mail in CD/Electronic disk
- SFTP/Electronic transfer

Checking on IR Status

In the HMS Colorado RAC Provider Portal

- Multi-user accessible for an NPI/Medicaid ID/Service Location
- Every upload, click or access is trackable for you and timestamped
- Even if mailed, you can check on certified mail

If mailed to HMS with certified mail

- Provider can check on Mailing Tracking ID
- HMS provider services will reach out when they received your request

If you are unsure your documents were received, you can call HMS Provider Services. HMS Provider Services (available M-F 8:00 a.m. to 5 p.m. Mountain Time): (877) 640-3419. HCPF will be unable to answer these kinds of requests.

Helpful Rules and Regulations

For state and federal statutes and regulations, refer to the following links and citations which further outline the Department's authority and the provider's responsibilities with regards to the Health First Colorado RAC program:

Code of Colorado Regulations:

10 CCR 2505-10 8.015.8.B;
10 CCR 2505-10 8.076.2.A-D;
10 CCR 2505-10 8.076.3A;
10 CCR 2505-10 8.130.2A
10 CCR 2505-10, 8.050.6
10 CCR 2505-10, 8.050.3

Code of Federal Regulations:

42 CFR Part 455, Subpart F
42 CFR 433.316

Colorado Revised Statutes:

CRS 25.5-4-301

Self Disclosures

Sarah Geduldig

Deficit Reduction Act of 2005 (DRA)

- Under Section 1128J(d) of the Social Security Act, all entities who receive payment over \$5 million per year are required to sign and submit a declaration of compliance with DRA by Nov. 1.
- Compliance requires that covered entities provide information to employees and contractors about:
 - the Federal False Claims Act and other applicable federal and state false claims laws,
 - Must include policies and procedures for detecting and preventing fraud, waste, and abuse
 - the administrative remedies for false claims and statements, and
 - the whistleblower protections afforded under such law
- Information can be found: <https://hcpf.colorado.gov/deficit-reduction-act-of-2005>

Provider Self-Audit Process

- Though the DRA requirements is not required for all providers, we highly encourage providers to have some sort of policy or procedure that ensures billing compliance to prevent and detect fraud, waste, and abuse.
- Best practices would be to conduct routine self-audits and self-disclose any findings requiring disclosure.
- Self Audit info can be found: <https://hcpf.colorado.gov/protocol-for-self-audit>

Provider Self-Disclosure Process

Statutes and Rules

- [42 U.S.C. § 1320a-7k\(d\)](#)
- 10 CCR 2505-10, Section 8.076.3.C

Self-Disclosure Process

- If a provider identifies that it received an overpayment, the provider is required to report and return the overpayment within 60 days of identification.
- When making this self-disclosure, the provider can use the HCPF provided spreadsheet to ensure that all required fields are provided so that the claim(s) can be properly identified and must include payment.
- Further instructions can be found: <https://hcpf.colorado.gov/provider-self-disclosure>

RAC Audits & Communications Updates

Prismar Perez

Audit Changes, Updates, & Mailings

E-Code (Suction Machine) Audit Findings

- Year-specific benefit/rule applied
- 7 claims found to be in our audit error (\$200)
- Rescind letters sent for amended findings

Radiology Duplicates

- Rescind letters sent in September

Initial Hospital Care Codes

- Restarted after a year long pause

*Updates on incontinence products will be communicated via memo

IR Rule Update (Correlates to re-billing timeline)

In June, HCPF sent out an email to providers requesting feedback on IR rule changes for the RAC Program. At this time, HCPF continues to evaluate possible changes to the IR rule. As HCPF is working on establishing the rebilling option, we want to make sure that any proposed rule changes coincides with this change. Thanks for your patience as we continue to evaluate this rule change and will update once we have additional information.

Upcoming Training Opportunities

Meghan DeLisle

Upcoming Stakeholder Webinars & HCPF Training Opportunities

RAC Stakeholder Meetings

- Thursday February 1st, 2024 12pm-1pm MST
- Thursday May 2nd, 2024 12pm-1pm MST

HCPF Provider Training

- **Beginner Billing Training: Professional Claims (CMS 1500)** Thursday, December 7, 2023 9:00am-11:30am MST
- **Beginner Billing Training: Institutional Claims (UB-04)** Thursday, December 14, 2023 9:00am-11:30am MST

RAC 101 Training Opportunities

RAC 101: Automated Audit Training

Tuesday, January 16, 2024 10am-11am MST

Tuesday, April 16, 2024 10am-11am MST

RAC 101: Hospice Audit Training

Wednesday, December 13, 2023 2pm-3pm MST

Thursday, March 14, 2024 1pm-2pm MST

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

RAC 101: Complex Audit Training

Wednesday, November 8, 2023 10am-11am MST

Tuesday, February 20, 2024 2pm-3pm MST

Wednesday May 15, 2024 11am-12pm MST

Features of the HMS Colorado RAC Provider Portal

- Providers can access multiple facility claims that they have requested access to
- The Provider Portal tracks all audits and data is easily exported into an Excel file
- Medical records can be submitted, in a PDF format
 - Providers can identify if medical records have uploaded correctly
- Providers can update contact information with ease
- HMS will maintain updated addresses for mailing of any audit communications

Recorded Training for the HMS Colorado RAC Provider Portal can be accessed [here](#).

HMS Portal: <https://hmsportal.hms.com/>

RAC 101: Complex Audit Training

Wednesday, November 8, 2023 10am-11am MST

<https://events.teams.microsoft.com/event/028aa769-9871-4f73-9e1c-6b131fca1be0@c663f89c-ef9b-418f-bd3d-41e46c0ce068>

Complex 101 training next week will include training on the HMS
Colorado RAC Provider Portal

We Want to Hear From You!

Want RAC Updates?

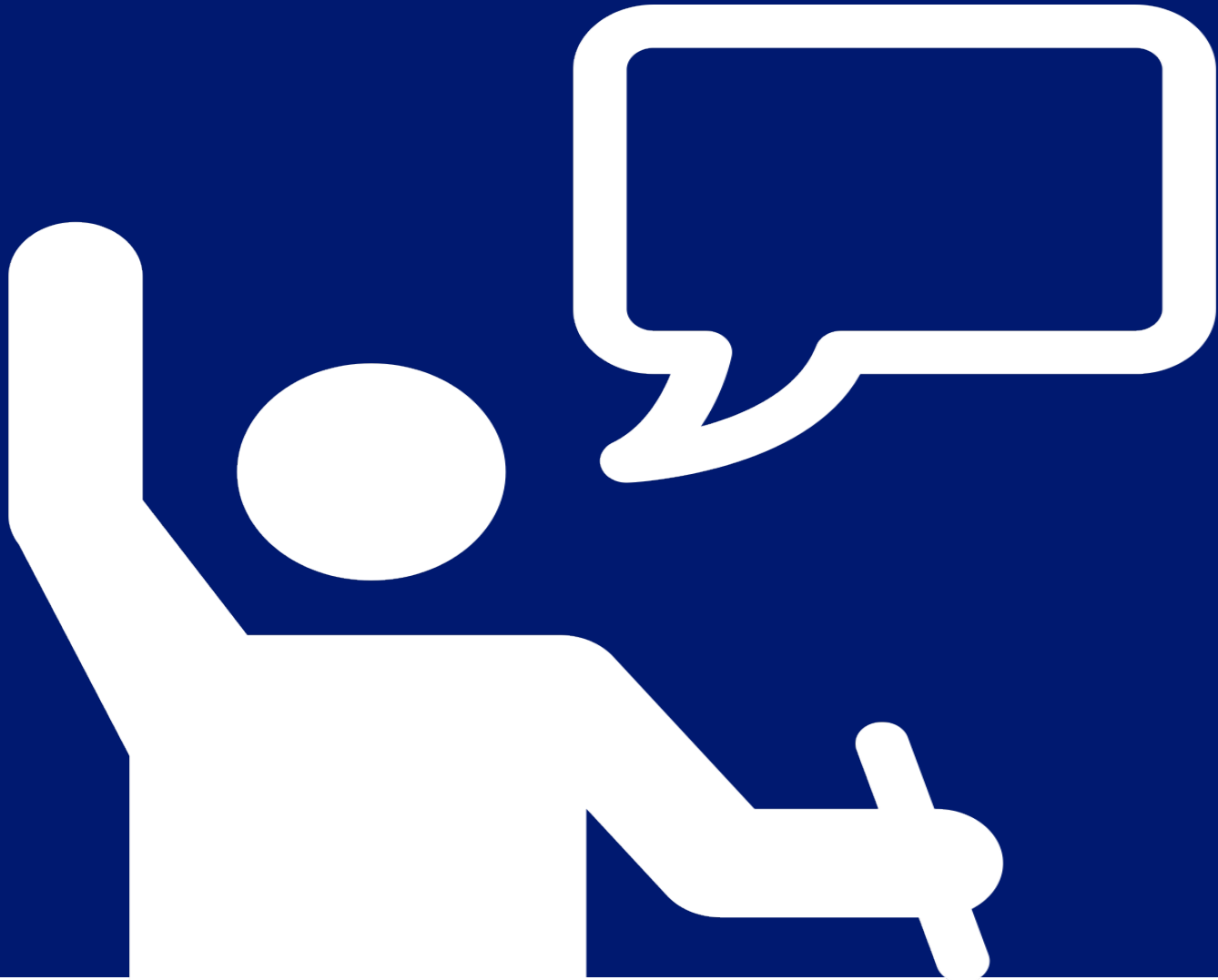
We have created a form that is utilized by us to send email blasts, flyers, and any communications to Providers. This will ensure quick and efficient information is being communicated while any updates to the website or content are being made.

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

Want to give us feedback?

The Department has 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](#)



Q & A

