



COMMONWEALTH of VIRGINIA

Department of Medical Assistance Services

KAREN KIMSEY
DIRECTOR

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September 2, 2020

Linda Hines, CEO
Virginia Premier Health Plan
600 E. Broad Street, 4th Floor
Richmond, VA 23219

Re: CCC Plus Program – Corrective Action Plan (CAP) – Failure to submit required reports

Dear Ms. Hines,

The Department of Medical Assistance Services (DMAS) continually monitors the accuracy and timeliness of essential reports. Virginia Premier Health Plan (VA Premier or Contractor) is required to adhere to the general reporting requirements specified in Section 17.1 of the CCC Plus Contract which states “the Contractor shall adhere to delivery of all reports established by the Department and noted within the CCC Plus Technical Manual and this Contract.”

It was reported by the DMAS Office of Quality and Population Health that VA Premier failed to administer the Children with Chronic Conditions Consumer Assessment of Healthcare Providers and Systems (CAHPS) survey to the member population. It is stated in Section 10.6 of the CCC Plus Contract that “annually, the Contractor shall conduct Member experience and Provider survey activities, as follows:

- 1) Conduct an annual CAHPS survey. The Contractor shall enter into agreement with a vendor that is certified by NCQA to perform CAHPS surveys. The Contractor’s vendor shall perform the CAHPS Adult Version Medicaid survey, CAHPS Child Version, Children with Chronic Conditions Medicaid survey using the most current CAHPS version specified by NCQA. Survey results shall be reported on the CCC Plus program separately for each required CAHPS surveys listed above with results specifically for the CCC Plus program. Composite scores should also be reported. Performance on CAHPS surveys may also be publicized as described above. The Contractor is required to identify Spanish speaking Members through administrative data and ensure those Members who are included in the CAHPS sample receive the Spanish version of the survey rather than

the English version. Survey results shall be submitted to the Department, NCQA, and Agency for Healthcare Research and Quality (AHRQ) for inclusion in the National CAHPS Benchmarking Database if the option is available through AHRQ. CAHPS Surveys are due annually by June 15 of each calendar year beginning in 2019

Failing to conduct this survey is a serious issue. It is critical to evaluate quality of care for this at-risk population in order for DMAS to assess how well the needs of children with chronic conditions are being met and identify which aspects of care need to be improved. The lack of this data will have a detrimental impact on DMAS' capability to conduct detailed analyses and produce quality reports about this information.

As a result of the critical error in delivering essential reports, Virginia Premier will be required to submit a Corrective Action Plan (CAP) to DMAS that addresses how they will adhere to reporting timeframes outlined in the CCC Plus contract and technical manual. This CAP will be submitted for approval no later than 30 calendar days from the date of this letter. Virginia Premier will need to identify the root cause(s) for the lack of compliance and develop a practicable project plan to ensure contractual compliance is maintained. Please ensure that the CAP includes a project plan or list of deliverables, milestones, due dates, and percentage complete that address the root cause(s) for the lack of compliance. A weekly update to this project plan to DMAS will be required for monitoring progress. Failure to comply with the approved CAP will result in additional sanctions.

Virginia Premier will be issued a point violation pursuant to Section 18.0 of the CCC Plus Contract. Assessment of these points are pending. If you have additional information and/or documentation that will affect this determination, please provide this information to Jason A. Rachel, Ph.D., Division Director, within 15 calendar days from the date of this letter (“Comment Period”). Point violations will be finalized upon the expiration of the Comment Period. After this time, no additional communication will be provided by DMAS regarding the point issuance.

If you have any questions regarding these concerns, contract standards or CAP requirements, please contact Joshua Walker at 804-418-4464. Please sign, date and return acknowledging receipt to cccpluscompliance@dmas.virginia.gov.

Sincerely,



Tammy Whitlock, MSHA
Deputy of Complex Care and Services

cc: Elizabeth Smith, RN

cc: Jason Rachel, PhD

Exhibit 1 – Premier – 2020 Point Schedule

<u>MCO</u>	<u>Area(s) of Violation</u>	<u>Previous Balance</u>	<u>Point(s) Expired</u>	<u>Point(s) Incurred</u>	<u>Current Balance</u>	<u>Sanctions pursuant to 18.2.2</u>
Virginia Premier Health Plan	10.6	10	0	1	11	\$1,000

18.3.2 Submission of Reporting Deliverables

All submissions, data and documentation submitted by the Contractor must be received by the Department as specified in this Contract. If the Contractor fails to provide the Department with any required submission, data or documentation (including failure to use the proper templates contained in the CCC Plus Technical Manual), the Department may assess points on a “per report” basis, as outlined in Section 18.2.3.1, One (1) Point Violations unless the Contractor requests and is granted an extension by the Department.

Acknowledge agreement via signature below to address the Corrective Action Plan (CAP) for failure to submit required reports.

Linda Hines (Signature & Date)