



COMMONWEALTH of VIRGINIA
Department of Medical Assistance Services

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RICHMOND, VA 23219
804/786-7933
800/343-0634 (TDD)
www.dmas.virginia.gov

September 12, 2019

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

Re: Commonwealth Coordinated Care Plus (CCC Plus) Program – Response to Corrective Action Plan

Dear Ms. Hines,

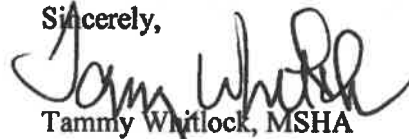
Thank you for your response to the Corrective Action Plan (CAP) issued to Virginia Premier on August 09, 2019. The Department of Medical Assistance Services (DMAS) has reviewed the appeal request. While DMAS recognizes the efforts Virginia Premier has made to reconcile Skilled Nursing Facility (SNF) Part A and B issues, the continued inaccurate processing of these claim types dating back to March 2018 is concerning. Additionally, while the self-reported accuracy and timeliness rates submitted by Virginia Premier have been improving, contractual non-compliance remains. According to the CCC Plus contract, MCO's must demonstrate accurate and timely payment for Medicaid services. Virginia Premier has not met contractual standards regarding SNF Part A and B payment processing as stated in the original CAP letter. Therefore, DMAS has determined the Part A and B payment processing issue to include inaccurate adjudication of SNF Part A and B crossover claims and respective points and sanctions will not be removed from the CAP. Please note, the remittance advice (RA) issue addressed in the original CAP letter will be documented separately. Please see attached CAP letter.

Virginia Premier will be issued a point violation pursuant to Section 18.0 of the CCC Plus Contract. Assessment of these points are stated in Exhibit 1 below. Virginia Premier shall submit a Corrective Action Plan (CAP) to DMAS for SNF Part A and B crossover payments 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 rates are maintained. The project plan should also include the issues discussed during the Nursing Facility bi-weekly conference calls. Failure to comply with the approved CAP may result in additional sanctions.

Virginia Premier Health Plan

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,

A handwritten signature in black ink, appearing to read "Tammy Whitlock". The signature is written in a cursive style with a large initial "T".

Tammy Whitlock, MSHA

Deputy Director of Complex Care and Services

Virginia Premier Health Plan

Exhibit 1 – Virginia Premier Health Plan – 2019 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	12.4.1 / 12.4.2	0	5	5	5	\$1,000

18.2.3.2 Five (5) Point Violations

Noncompliance with Claims Adjudication Requirements - If the Department finds that the Contractor is unable to (1) electronically accept and adjudicate claims to final status, or (2) notify providers of the status of their submitted claims, the Contractor may be assessed 5 points per incident of noncompliance. If the Department has identified specific instances where a Contractor has failed to take the necessary steps to comply with the requirements specified in this Contract by (1) failing to notify non-contracting providers of procedures for claims submissions when requested or (2) failing to notify contracting and non-contracting providers of the status of their submitted claims, the Contractor may be assessed 5 points per incident of noncompliance.

Virginia Premier Health Plan

Acknowledge agreement via signature below to address the Corrective Action Plan (CAP) within the attached letter.

Linda Hines 12/3/19

Linda Hines (Signature & Date)