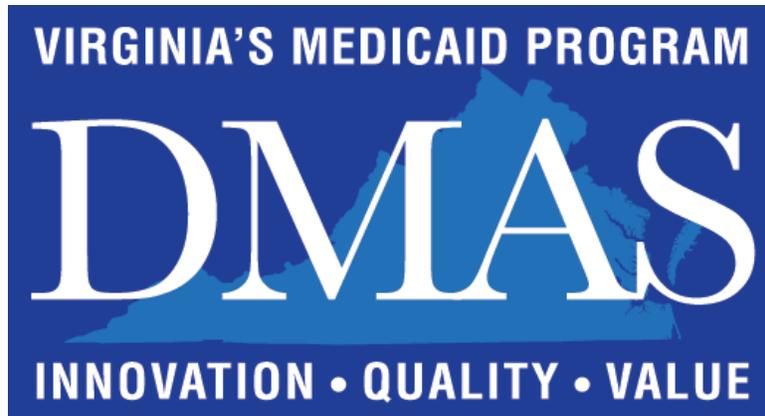


Monthly MCO Compliance Report

Medallion 4.0 December 2019 Deliverables



Health Care Services Division

March 13, 2020

Monthly MCO Compliance Report

Medallion 4.0 December 2019 Deliverables

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Compliance Points Overview

MCO	Prior Month Point Balance	Point(s) Incurred for Current Month*	Point(s) Expiring from December 2018	Final Point Balance*	Area of Violation: Finding or Concern
<u>Aetna</u>	8.0	1.0	0.0	9.0	<u>FINDINGS</u> EI Claims Issue <u>CONCERNS</u> Data Errors
<u>Anthem</u>	6.0	3.0	0.0	9.0	<u>FINDINGS</u> Data Errors EI Claims Issue
<u>Magellan</u>	10.0	1.0	0.0	11.0	<u>FINDINGS</u> Data Error
<u>Optima Health</u>	14.0**	1.0	0.0	15.0**	<u>FINDINGS</u> Data Error
<u>United</u>	5.0	1.0	0.0	6.0	<u>FINDINGS</u> Late Submission
<u>VA Premier</u>	16.0	7.0	0.0	23.0	<u>FINDINGS</u> Late Submission EI Claims Issue Call Center Issue

**All listed point infractions are pending until the expiration of the 15-day comment period.*

***Optima had one compliance point in suspended status pending a review of CES # 2311.*

Notes:

-**Findings**- Area(s) of violation; point(s) issued.

-**Concerns**- Area(s) of concern that could lead to potential findings; **no** points issued.

-**Expired Points**- Compliance points expire 365 days after issuance. Thus, all points issued in December 2018 (Issue date: 1/15/19) expire on 1/15/20 and are subtracted from the final point balance.

Summary

The **Compliance Review Committee (CRC)** met on February 6, 2020 to review deliverables measuring performance for December 2019 as well as other reported program issues. The CRC consists of five managers and supervisors from the Health Care Services division who vote on what, if any, compliance enforcement actions to take in response to identified issues of potential non-compliance.

The CRC voted to issue compliance points to managed care organizations (MCOs) for failure to meet call center requirements, untimely deliverable submissions, data reporting errors, and untimely payment of early intervention (EI) claims.

Each MCO's compliance findings and concerns are further detailed below. Data related to the Health Care Services Division's compliance activities are also included. The Department communicated the findings of its review of December's compliance issues in letters issued to the MCOs on February 13, 2020.

Aetna Better Health of Virginia

Findings:

- **Untimely Payment of EI Claims:** DMAS timely received the December 2019 Early Intervention Services Report deliverable from Aetna. Upon review, the Compliance Unit discovered that the report indicated that Aetna failed to adjudicate one clean claim for EI services within 14 days of its receipt in December 2019.

Section 5.5 of the Medallion 4.0 contract requires the MCOs to adjudicate all clean claims for EI services within 14 days of their receipt. Thus, Aetna violated the terms of the Medallion 4.0 contract in failing to adjudicate one clean claim for EI services within 14 days of its receipt.

According to Section 10.1.E.a of the Medallion 4.0 contract, a failure to comply with the contract that "represents a threat to [the] smooth and efficient operation" of the Medallion 4.0 program is subject to a one point penalty. As a result, the CRC voted to assess Aetna a **one (1) point violation** due to its failure to adjudicate one clean claim within 14 days of its receipt.

Aetna has accumulated 9.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, Aetna will not be issued financial sanctions for this issue. The CRC voted not to require Aetna to submit a corrective action plan (CAP). **(CES # 2632)**

Concerns:

- **Data Submission Error:** DMAS timely received the December 2019 Foster Care Barrier Report deliverable from Aetna. Upon review, it was determined that 25% of total entries in Aetna's submission contained data errors. Specifically, 25% of the deliverable's entries contained a single digit value in the 'category' field instead of one of the two-digit values required by Section 1.6.7.2 of the Medallion 4.0 Deliverables Technical Manual.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Aetna violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" are subject to a one point penalty. However, DMAS' subject matter expert noted that the data submission error in Aetna's 2019 Foster Care Barrier Report deliverable did not significantly impair DMAS' ability to oversee or analyze Aetna's performance. DMAS' subject matter expert suggested that Aetna not be subject to compliance points due to its data submission error.

The Compliance Team recommended that in response to the issue identified above, Aetna be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. **(CES # 2635)**

- **Data Submission Error:** DMAS timely received the January 21, 2020 weekly Provider File - Enrollment Broker deliverable from Aetna. Upon review, it was determined that Aetna submitted the deliverable in a tab-delimited .csv file instead of the comma-delimited .csv file required by Section 1.4.3.1 of the Medallion 4.0 Deliverables Technical Manual.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Aetna violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" are subject to a one point penalty. However, DMAS' subject matter expert noted that the data formatting error in Aetna's January 21, 2020 weekly Provider File - Enrollment Broker deliverable did not significantly impair DMAS' ability to oversee or analyze Aetna's performance. DMAS' subject matter expert suggested that Aetna not be subject to compliance points due to its data submission error.

The Compliance Team recommended that in response to the issue identified above, Aetna be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. **(CES # 2636)**

MIP/CAP Update:

- No updates

Appeal Decision:

- No appeals

Expiring Points:

- No expiring points

Financial Sanctions Update:

- No outstanding sanctions at this time

Summary:

- For deliverables measuring performance for December 2019, Aetna showed a high level of compliance. Aetna timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. Two reporting deliverables contained minor data errors (addressed above in **CES # 2635 & 2636**). Aetna's member and provider call centers complied with abandonment ratio requirements, and outside of an issue listed above (in **CES # 2632**), Aetna complied with all applicable provider payment timeliness requirements. In summation, Aetna complied with almost every applicable regulatory and contractual requirement.

Anthem HealthKeepers Plus

Findings:

- **Data Submission Error:** The Department timely received the December 2019 MCO Newborn Reconciliation File deliverable from Anthem. Upon review, it was determined that the deliverable contained reporting errors in 100% of its entries. Specifically, the report contained only newborns with birth dates in November 2018. The report did not comply with Section 1.6.6.2 of the Medallion 4.0 Deliverables Technical Manual, which requires all newborns reported on the MCO Newborn Reconciliation File deliverable to be reported in the month following the month in which the newborn turned age one.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Anthem violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" should receive 1 point. As a result, the CRC voted to assess Anthem a **one (1) point violation** due to reporting errors in its December 2019 MCO Newborn Reconciliation File deliverable.

Anthem has accumulated 9.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, Anthem will not be issued financial sanctions for this issue. The CRC voted not to require Anthem to submit a CAP. **(CES # 2638)**

- **Data Submission Error:** The Department timely received the November 2019 MCO Claims Report deliverable from Anthem. Upon review, the Compliance Unit discovered that the report indicated that Anthem failed to adjudicate 11 clean claims within one calendar year of their receipt in November 2019, in violation of Section 1932(f) of the Social Security Act and Section 5.5 of the Medallion 4.0 contract.

Due to the serious nature of this issue, the Compliance Team initiated a desk review of the issue, so that the Compliance Unit could fully understand the circumstances surrounding Anthem's report of adjudicating 11 clean claims more than one calendar year after their receipt. Upon review of

documentation including claims processing system screenshots, narrative descriptions of the issue, and other pertinent information, the Compliance Team found that Anthem misreported untimely adjudicating the 11 claims at issue. The Compliance Team found that Anthem did not fail to adjudicate claims in a timely fashion, but also found that Anthem committed a serious reporting error when it reported adjudicating 11 clean claims in over one calendar year.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Anthem violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" should receive 1 point. As a result, the CRC voted to assess Anthem a **one (1) point violation** due to a serious reporting error in its November 2019 MCO Claims Report deliverable.

Anthem has accumulated 9.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, Anthem will not be issued financial sanctions for this issue. The CRC voted not to require Anthem to submit a CAP. **(CES # 2549)**

- **Untimely Payment of EI Claims:** DMAS timely received the December 2019 Early Intervention Services Report deliverable from Anthem. Upon review, the Compliance Unit discovered that the report indicated that Anthem failed to adjudicate 18 clean claims for EI services within 14 days of their receipt in December 2019.

Section 5.5 of the Medallion 4.0 contract requires the MCOs to adjudicate all clean claims for EI services within 14 days of their receipt. Thus, Anthem violated the terms of the Medallion 4.0 contract in failing to adjudicate 18 clean claims for EI services within 14 days of their receipt.

According to Section 10.1.E.a of the Medallion 4.0 contract, a failure to comply with the contract that "represents a threat to [the] smooth and efficient operation" of the Medallion 4.0 program is subject to a one point penalty. As a result, the CRC voted to assess Anthem a **one (1) point violation** due to its failure to adjudicate 18 clean claims within 14 days of their receipt.

Anthem has accumulated 9.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, Anthem will not be issued financial sanctions for this issue. The CRC voted not to require Anthem to submit a corrective action plan (CAP). **(CES # 2637)**

Concerns:

- No concerns

MIP/CAP Update:

- No updates

Appeal Decision:

- No appeals

Expiring Points:

- No expiring points

Financial Sanctions Update:

- No outstanding sanctions at this time

Summary:

- For deliverables measuring performance for December 2019, Anthem showed a high level of compliance. Anthem timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. Two monthly deliverables contained reporting errors (addressed above in **CES # 2549 & 2638**). Anthem's member and provider call centers complied with abandonment ratio requirements, and outside of an issue listed above (in **CES # 2637**), Anthem complied with all applicable provider payment timeliness requirements. In summation, Anthem complied with almost every applicable regulatory and contractual requirement.

Magellan Complete Care

Findings:

- **Data Submission Error:** The Department timely received the October 2019 MCO Claims Report deliverable from Magellan. Upon review, the Compliance Unit discovered that the report indicated that Magellan failed to adjudicate four clean claims within one calendar year of their receipt in October 2019, in violation of Section 1932(f) of the Social Security Act and Section 5.5 of the Medallion 4.0 contract.

Due to the serious nature of this issue, the Compliance Team initiated a desk review of the issue, so that the Compliance Unit could fully understand the circumstances surrounding Magellan's report of adjudicating four clean claims more than one calendar year after their receipt. Upon review of documentation including claims processing system screenshots, narrative descriptions of the issue, and other pertinent information, the Compliance Team found that Magellan misreported untimely adjudicating the four claims at issue. The Compliance Team found that Magellan did not fail to adjudicate claims in a timely fashion, but also found that Magellan committed a serious reporting error when it reported adjudicating four clean claims in over one calendar year.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Magellan violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" should receive 1 point. As a result, the CRC voted to assess Magellan a **one (1) point violation** due to a serious reporting error in its October 2019 MCO Claims Report deliverable.

Magellan has accumulated 11.0 points, placing it in Level 2 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, the Compliance Deficiency Identification System requires a plan in Level 2 to be issued a financial sanction in the amount of \$5,000 for each compliance enforcement action taken. As a result, Magellan will be assessed a **\$5,000 financial sanction** in response to the serious reporting error in its October 2019 MCO Claims Report deliverable. The CRC voted not to require Magellan to submit a CAP. **(CES # 2492)**

Concerns:

- No concerns

MIP/CAP Update:

- No updates

Appeal Decision:

- No appeals

Expiring Points:

- No expiring points

Financial Sanctions Update:

The following financial sanctions will be sent to DMAS' Fiscal Division for enforcement:

- October 2019 Data Reporting Error Issue - \$5,000 (CES # 2492)

Summary:

- For deliverables measuring performance in December 2019, Magellan showed a very high level of compliance. Magellan timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. One monthly deliverable contained a serious reporting error (addressed above in **CES # 2492**). Magellan's member and provider call centers complied with abandonment ratio requirements, and Magellan complied with all applicable provider payment timeliness requirements. In summation, Magellan complied with almost every applicable regulatory and contractual requirement.

Optima Health

Findings:

- **Data Submission Error:** The Department timely received the October 2019 MCO Claims Report deliverable from Optima. Upon review, the Compliance Unit discovered that the report indicated that Optima failed to adjudicate one clean claim within one calendar year of its receipt in October 2019, in violation of Section 1932(f) of the Social Security Act and Section 5.5 of the Medallion 4.0 contract.

Due to the serious nature of this issue, the Compliance Team initiated a desk review of the issue, so that the Compliance Unit could fully understand the circumstances surrounding Optima's report of adjudicating one clean claim more than one calendar year after its receipt. Upon review of documentation including claims processing system screenshots, narrative descriptions of the issue, and other pertinent information, the Compliance Team found that Optima misreported untimely adjudicating the four claims at issue. The Compliance Team found that Optima did not fail to adjudicate claims in a timely fashion, but also found that Optima committed a serious reporting error when it reported adjudicating one clean claim in over one calendar year.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Optima violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" should receive 1 point. As a result, the CRC voted to assess Optima a **one (1) point violation** due to a serious reporting error in its October 2019 MCO Claims Report deliverable.

Optima has accumulated 11.0 points, placing it in Level 2 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, the Compliance Deficiency Identification System requires a plan in Level 2 to be issued a financial sanction in the amount of \$5,000 for each compliance enforcement action taken. As a result, Optima will be assessed a **\$5,000 financial sanction** in response to the serious reporting error in its October 2019 MCO Claims Report deliverable. The CRC voted not to require Optima to submit a CAP. **(CES # 2475)**

Concerns:

- No concerns

MIP/CAP Update:

- No updates

Appeal Decision:

- **CES # 2311:** Review of Optima's appeal of CES # 2311 (untimely payment of EI claims) is currently underway, and the outcome is pending.

Expiring Points:

- No expiring points

Financial Sanctions Update:

The following financial sanctions will be sent to DMAS' Fiscal Division for enforcement:

- October 2019 Data Reporting Error Issue - \$5,000 (**CES # 2475**)

Summary:

- For deliverables measuring performance in December 2019, Optima showed a very high level of compliance. Optima timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. One monthly deliverable contained a serious reporting error (addressed above in **CES # 2475**). Optima's member and provider call centers complied with abandonment ratio requirements, and Optima complied with all applicable provider payment timeliness requirements. In summation, Optima complied with almost every applicable regulatory and contractual requirement.

UnitedHealthcare

Findings:

- **Untimely Deliverable Submission:** United failed to timely submit the December 2019 MCO Newborn Reconciliation File deliverable as required by Section 1.6.6.1 of the Medallion 4.0 Deliverables Technical Manual. The report was due January 15, 2020, but was not submitted until January 16, 2020.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, United violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" are subject to a 1 point penalty. As a result, the CRC voted to assess United a **one (1) point violation** due to its untimely submission of the December 2019 MCO Newborn Reconciliation File deliverable.

United has accumulated 6.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, United will not be issued financial sanctions for this issue. The CRC voted not to require United to submit a CAP. **(CES # 2629)**

Concerns:

- No concerns

MIP/CAP Update:

- No updates

Appeal Decision:

- **CES # 2471:** The Department received the following message from United in regards to **CES # 2471**, a case in which United was issued a NONC for untimely adjudication of internal appeals:

"We are in receipt of your letter regarding Case ID 2471 dated December 13, 2019. We respectfully object to the finding of contractual noncompliance for the reasons outlined below.

The letter cites Section 12.3 of the Medallion 4.0 contract as requiring the Contractor to adjudicate appeals within thirty (30) calendar days of receipt. Contract Section 12.3 governs Member Appeals, while the two appeals at issue in the October 2019 report submission were Provider Reconsiderations. The Medallion 4.0 contract does not contain a required timeframe to adjudicate Reconsiderations.

Although we disagree with the finding of contractual noncompliance, we do strive to provide a high level of service to our network providers. To that end, we continually review internal processes to identify opportunities to improve efficiencies.

Thank you for your time and consideration.”

Upon reviewing United’s statement, the CRC voted to overturn the NONC issued in response to **CES # 2471**. The Department sent the following response to Aetna:

“Thank you for bringing the this to our attention.

We have reviewed your request for consideration, and discussed the options of rescinding the Notice of Non-Compliance letter for Case ID 2471, dated 12/13/2019, with the Health Care Services Compliance Review Committee (CRC).

The CRC recently met on January 6, 2020, and voted to overturn the Notice of Non-Compliance (NONC) associated with Case ID 2471. As there are no point or financial penalties associated with Case ID 2471, this NONC has been rescinded and will be reflected as closed on UnitedHealthcare's Active Points Schedule.

Should you have any questions, please don't hesitate to reach out to us directly.”

Expiring Points:

- No expiring points

Financial Sanctions Update:

- No outstanding sanctions at this time

Summary:

- For deliverables measuring performance for December 2019, United showed a very high level of compliance. United timely submitted 22 of 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. One monthly deliverable was submitted late (addressed

above in **CES # 2629**). United's member and provider call centers complied with abandonment ratio requirements, and United complied with all applicable provider payment timeliness requirements. In summation, United complied with almost every applicable regulatory and contractual requirement.

Virginia Premier

Findings:

- **Untimely Payment of EI Claims:** The Department timely received the December 2019 Early Intervention Services Report deliverable from Virginia Premier. Upon review, the Compliance Unit discovered that the report indicated that Virginia Premier failed to adjudicate seven clean claims for EI services within 14 days of their receipt in December 2019.

Section 5.5 of the Medallion 4.0 contract requires the MCOs to adjudicate all clean claims for EI services within 14 days of their receipt. Thus, Virginia Premier violated the terms of the Medallion 4.0 contract in failing to adjudicate clean claims for EI services within 14 days of their receipt.

According to Section 10.1.E.a of the Medallion 4.0 contract, a failure to comply with the contract that "represents a threat to [the] smooth and efficient operation" of the Medallion 4.0 program is subject to a one point penalty. As a result, the CRC voted to assess Virginia Premier a **one (1) point violation** due to its failure to adjudicate clean claims within 14 days of their receipt.

Virginia Premier has accumulated 23.0 points, placing it in Level 2 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, the Compliance Deficiency Identification System requires a plan in Level 2 to be issued a financial sanction in the amount of \$5,000 for each compliance enforcement action taken. As a result, Virginia Premier will be assessed a **\$5,000 financial sanction** for its failure to adjudicate EI clean claims within 14 days of their receipt. The CRC voted not to require Virginia Premier to submit a CAP. **(CES # 2634)**

- **Call Center Statistics:** Based on Virginia Premier's December 2019 MCO Call Center Statistics deliverable, Virginia Premier answered 91.17% of incoming member calls in the month of December 2019. Per Section 5.4.A of the Medallion 4.0 contract, in order to be compliant, Virginia Premier was required to answer at least 95% of incoming member calls. Virginia Premier failed to answer enough incoming member calls to be in compliance in December 2019.

According to Section 10.1.E.b of the Medallion 4.0 contract, failures to comply with the contract that represent "a threat to the integrity of the program" or that "impair a member's or potential enrollee's ability to obtain correct information regarding services" are subject to a 5 point penalty. As a result,

the CRC voted to assess Virginia Premier a **five (5) point violation** for its failure to answer at least 95% of incoming calls to its member call center.

Virginia Premier has accumulated 23.0 points, placing it in Level 2 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, the Compliance Deficiency Identification System requires a plan in Level 2 to be issued a financial sanction in the amount of \$5,000 for each compliance enforcement action taken. As a result, Virginia Premier will be assessed a **\$5,000 financial sanction** for its failure to answer at least 95% of incoming calls to its member call center. The CRC voted not to require Virginia Premier to submit a CAP. **(CES # 2631)**

- **Untimely Deliverable Submission:** Virginia Premier failed to timely submit the December 2019 Appeals & Grievances Summary deliverable as required by Section 1.12.6.1 of the Medallion 4.0 Deliverables Technical Manual. The report was due January 15, 2020, but was not submitted until January 16, 2020.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Virginia Premier violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" are subject to a 1 point penalty. As a result, the CRC voted to assess Virginia Premier a **one (1) point violation** due to its untimely submission of the December 2019 Appeals & Grievances Summary deliverable.

Virginia Premier has accumulated 23.0 points, placing it in Level 2 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, the Compliance Deficiency Identification System requires a plan in Level 2 to be issued a financial sanction in the amount of \$5,000 for each compliance enforcement action taken. As a result, Virginia Premier will be assessed a **\$5,000 financial sanction** for its untimely submission of the December 2019 Appeals & Grievances Summary deliverable. The CRC voted not to require Virginia Premier to submit a CAP. **(CES # 2630)**

Concerns:

- No concerns

MIP/CAP Update:

- **CES # 2531:** The Department required Virginia Premier to submit an MCO Improvement Plan (MIP) in response to repeated failures to answer at least 95% of incoming calls to its provider call center. The due date for submission of the MIP was February 13, 2020. As of the February 6, 2020 CRC meeting, Virginia Premier had not submitted the MIP.

Appeal Decision:

- No appeals

Expiring Points:

- No expiring points

Financial Sanctions Update:

The following financial sanctions will be sent to DMAS' Fiscal Division for enforcement:

- December 2019 Call Center Statistics Issue - \$5,000 (**CES # 2631**)
- December 2019 EI Claims Payment Issue - \$5,000 (**CES # 2634**)
- December 2019 Untimely Deliverable Submission Issue - \$5,000 (**CES # 2630**)

Summary:

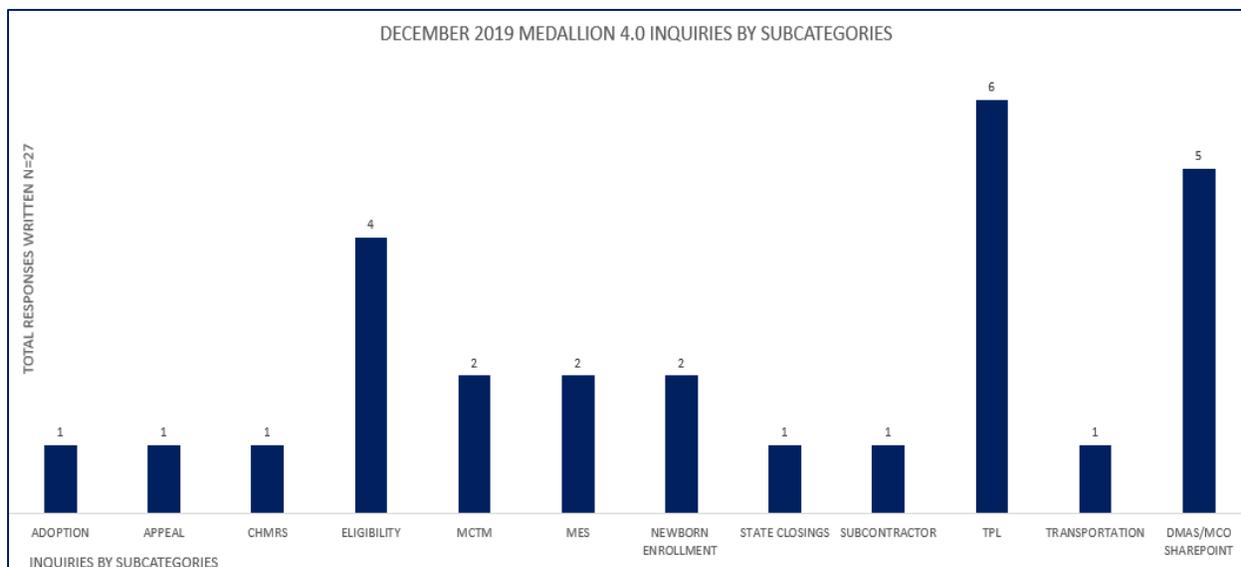
- For deliverables measuring performance in December 2019, Virginia Premier showed a moderate level of compliance. Virginia Premier timely submitted 22 of 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. One monthly deliverable was submitted late (addressed above in **CES # 2630**). Virginia Premier's provider call center complied with abandonment ratio requirements, but its member call center did not (addressed above in **CES # 2631**). Outside of an issue listed above (in **CES # 2634**), Virginia Premier complied with all applicable provider payment timeliness requirements. In summation, Virginia Premier complied with most applicable regulatory and contractual requirements.

Compliance Activity Data

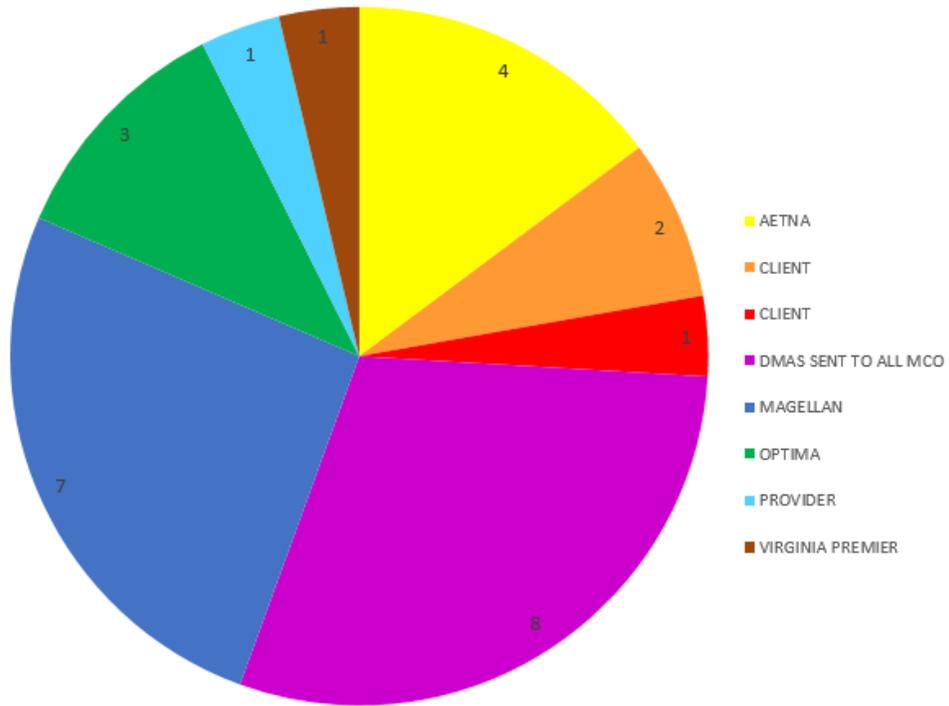
December 2019 – Member and Provider Solutions Unit

Member Inquiries <i>Received</i>	19
Provider Inquiries <i>Received</i>	18
MCO Inquiries <i>Received</i>	14
Constituent Concerns ("Pinks") <i>Received</i>	7
Marketing Materials <i>Reviewed</i>	79
Appeals	0
Other Inquiries <i>Received</i>	83

MEDALLION 4.0 MAILBOX MONITORING



DECEMBER 2019 MEDALLION 4.0 INQUIRIES BY PROVIDER, STAKEHOLDER & MCO



PROVIDER FRAUD ACTIVITY THROUGH DECEMBER

PROVIDER FRAUD ACTIVITY REFERRED TO MCOS		
Description	Open Cases	Closed Cases
GOOD CAUSE REFFERALS	0	18
PAYMENT SUSPENSIONS	1	18
INFORMATION REFEERAL TO MCO	2	11
ENDING PAYMENT SUSPENSIONS	0	15
MFCU INVESTIGATIONS	1	29
PROVIDER TERMINATIONS	0	34
PROVIDER TERMINATIONS (OTHER)	0	7
TOTAL	4	132

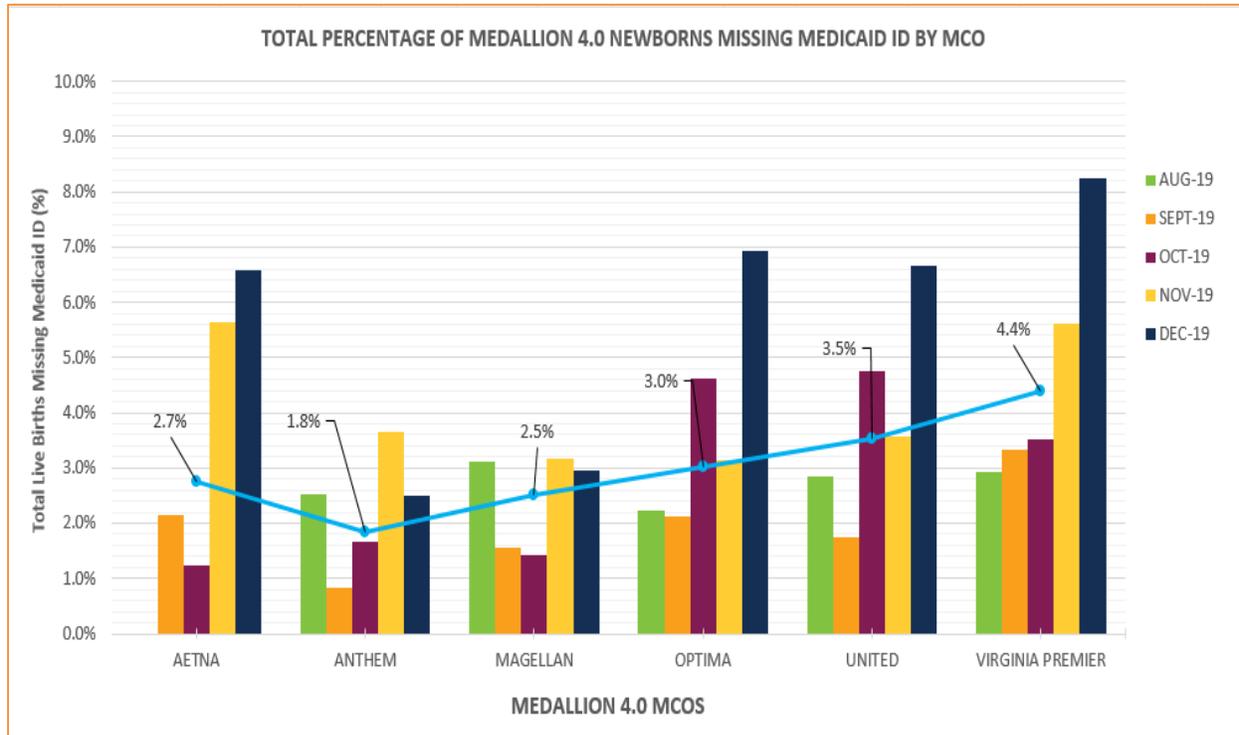
MEDALLION NEWBORN RECONCILIATION OVERSIGHT

MCO MED3	2017_09	2017_10	2017_11	2017_12	2018_01	2018_02	2018_03	2018_04	2018_05	2018_06	2018_07	2018_08	2018_09	2018_10	2018_11
	Anthem:	F	F	F	F	F	F	F	F	F	F	F	F	F	S
Coventry	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F
INTotal	F	F	F	F	F	F	F	F	F	F	F	F	F	C	C
Kaiser	F	F	F	F	F	F	F	C	F	F	C	C	C	C	C
Optima	F	F	F	F	F	F	F	F	F	F	F	C	F	F	F
VA Premier	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F
MED4 MCO	2018_08	2018_09	2018_10	2018_11	2018_12	2019_01	S - Recon request file has been submitted to DMAS and is being processed for reconciliation payment. C - Waiting for MCO to approve Provider Payment Agreement in order to make final reconciliation payment and close the period. F - Closed. All newborn processing is complete for the MCO for the period.								
Aetna (1044)	F	F	S	F	S	S									
Anthem (1045)	F	C	S	S	C	S									
Magellan (1046)	C	C	C	F	S	S									
Optima (1047)	S	F	F	F	C	S									
United (1048)	F	C	F	C	S	S									
VA Premier (1049)	F	F	F	F	S	S									

MEDALLION MAGELLAN BHS A CMHRS CLAIMS MONITORING

Reporting Month	Amount	Status	Retraction	Date Completed
SEPTEMBER	\$7,303.84	CLOSED	\$7,303.84	10/10/2018
OCTOBER	\$20,020.71	CLOSED	\$20,020.71	1/4/2019
NOVEMBER	\$198,261.12	CLOSED	\$119,047.14	3/29/2019
DECEMBER	\$13,432.02	CLOSED	\$10,581.88	12/4/2019
JANUARY	\$6,396.68	CLOSED	\$6,396.68	12/16/2019
FEBRUARY	\$1,035.73	CLOSED	\$596.16	12/16/2019
MARCH	\$3,030.12	CLOSED	\$2,668.41	12/16/2019
APRIL	\$5,329.28	CLOSED	\$1,035.24	12/16/2019
MAY	\$0.00	CLOSED	\$0.00	NA
JUNE	\$291.48	CLOSED	\$291.48	12/16/2019
JULY	\$240.00	OPEN	\$240.00	
AUGUST	\$1,146.57	OPEN	\$1,146.57	
SEPTEMBER	\$534.94	OPEN	\$534.94	
OCTOBER	\$6,657.00	OPEN	\$6,657.00	
NOVEMBER	\$1,491.95	OPEN	\$1,491.95	
DECEMBER	\$1,320.09	OPEN	\$1,320.09	
Retraction Due				\$11,390.55
Actual Retraction Completed				\$170,229.19

MEDALLION 4.0 LIVE BIRTHS OVERSIGHT



MEDALLION 4.0 MCO PROVIDER CONTRACT REVIEWS

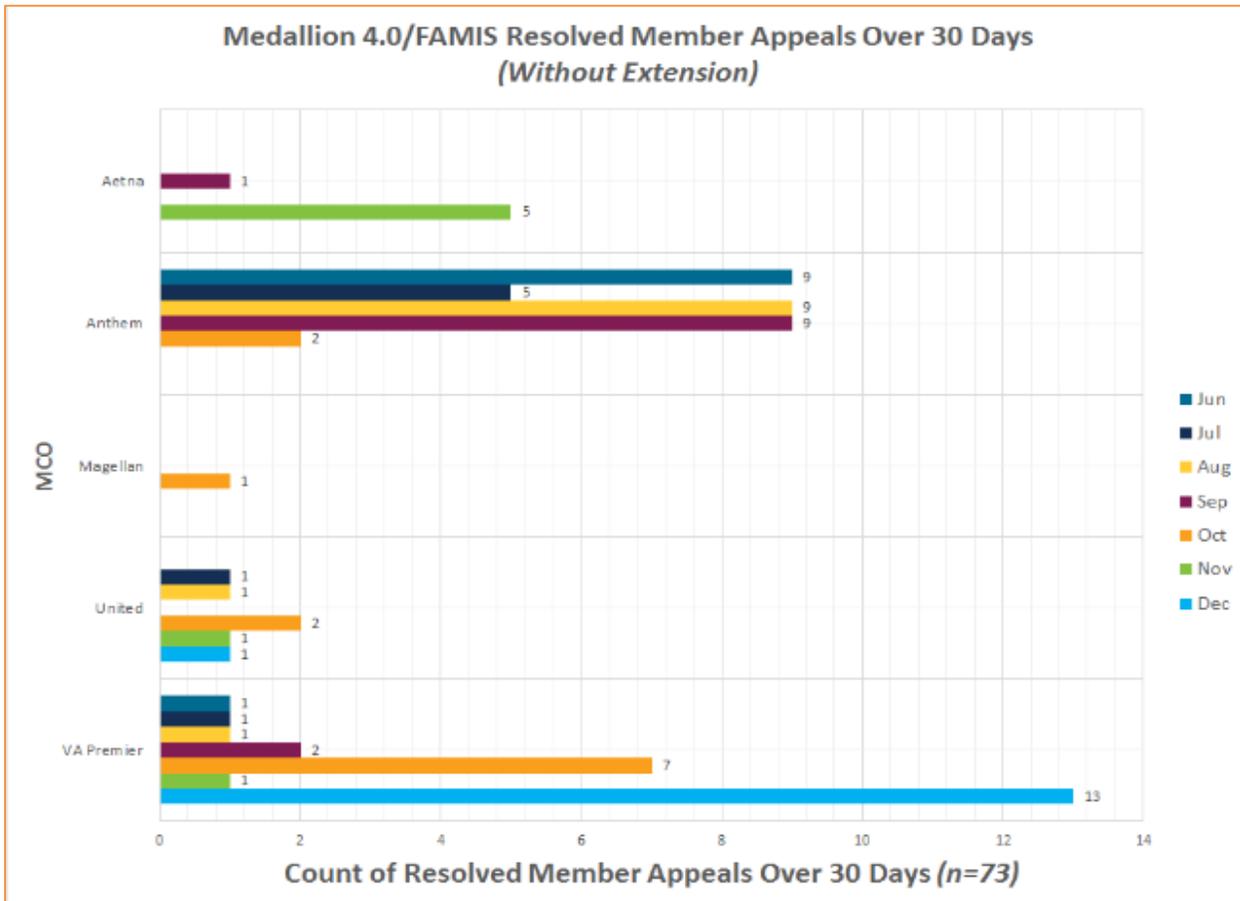
Sub_Dt_MCO	Name	Submission_of	DMAS_Comp	DMAS_Decision	MCO_Edits_Due	MCO_Comp	DMAS_Decision	DMAS_Comp	MCO_Edits_Due	MCO_Comp	DMAS_Decision	Final_Status
11/22/2019	United	Accountable Care Organization (ACO) Agreement	10	Resubmission	1/31/2020	60	Resubmission	24	4/24/2020			Pending MCO
8/22/2019	United	NPO Participation Agreement - Regulatory Appendix	4	Resubmission	10/25/2019	91	Resubmission	24	2/17/2020	0	MCO Withdrawn	MCO Withdrawn
9/19/2019	United	National Ancillary Provider Participation Agreement	29	Resubmission	12/27/2019	80	Approved	28	NA	NA	NA	Approved
11/6/2019	Aetna	Network Services Agreement	21	Resubmission	1/26/2020	56	Resubmission	21	4/12/2020			Pending MCO
12/2/2019	Magellan	Provider Compensation Agreement Exhibit	11	Resubmission	2/11/2020	6	Resubmission	21	3/5/2020	0	MCO Withdrawn	MCO Withdrawn
1/22/2020	Magellan	Medallion 4.0 Provider Agreement Addendum	23	Resubmission	4/14/2020	5	Approved	5	NA	NA	NA	Approved
1/21/2020	Optima	Diagnosis Code Accuracy Agreement	23	Resubmission	4/13/2020	25	Approved	4	NA	NA	NA	Approved
8/19/2019	Magellan	Magellan Healthcare Inc., PCP Agreement Template	21	Resubmission	11/8/2019	2	Approved	9	NA	NA	NA	Approved
2/7/2020	Anthem	Single Case Agreement	19	Resubmission	4/26/2020							Pending MCO
2/26/2020	United	Retrospective Episode of Care Community Plan	14	Resubmission	5/10/2020							Pending MCO

MEDALLION 4.0 MEMBER LETTERS DASHBOARD – DECEMBER

MEDALLION 4.0 LETTERS DASHBOARD - DEC 2019

	Date Approved	Date Sent	Total Letters Sent
Medallion 4.0 Assignment	12/19/2019	12/26/2019	10,800
Medallion 4.0 MedEx Assignment	12/19/2019	12/27/2019	26,644
Medallion 4.0 Re-Enrollment	12/19/2019	12/24/2019	2,251
Medallion 4.0 MedEx Re-Enrollment	12/19/2019	12/24/2019	3,221
Medallion 4.0 Change	NA	NA	0
Medallion 4.0 MedEx Change	NA	NA	0
Medallion 4.0 Maternal Child Health Letters	12/19/2019	12/24/2019	1,394
Total Letters Sent			44,310

MEDALLION 4.0/FAMIS RESOLVED MCO APPEALS > 30 DAYS



MEDALLION 4.0 NEWBORN ENROLLMENT ENHANCEMENT E213 REPORTING

TOTAL COMPLETED E213 FORMS BY MCO FROM DMAS NEWBORN ENROLLMENT ENHANCEMENT - E213 LIVE BIRTHS REPORT PROJECT			
MCO	JAN FILE	FEB FILE	Grand Total
AB4	12	8	20
AH4	25	7	32
MC4	6	1	7
OH4	31	18	49
UH4	2		2
VP4	9	5	14
Grand Total	85	39	124
Total Newborns Sent to MCOs			266
Current Success Rate			47%

**Project launched in December 2019 as joint effort between DMAS and the MCOs to get newborns without a Medicaid ID properly enrolled with a Medicaid ID*

Next Steps

At this time, the Compliance Unit is continuing monthly Compliance Review Committee meetings, following up on reoccurring issues, and communicating with the MCOs regarding identified issues. The Compliance Unit is in the process of expanding the types of compliance issues it investigates, and involving itself with programmatic issues as well as technical deliverable issues.

The Compliance Unit recently expanded its enforcement efforts into the area of encounter data certifications.

The Compliance Unit is also responsible for generating and maintaining policies and procedures for the Health Care Services Division. The Compliance Unit has generated 10 policy and procedure documents to date, and the long-term project to create policies and procedures is ongoing.