

**Questions and Answers from presentation:
CCO Network Provider Audit & Appeal Process – July 29, 2020**

Will all audits be on a per claims basis and not use extrapolation for CCO Audits?

- Yes, that is correct at this point in time. Audits will be based on actuals for now. We are doing research to look at other possibilities, but we are not using extrapolation methodology at this time. When a reliable scientific methodology is validated against encounter claims, OPI will employ extrapolation as appropriate.

Who is responsible for collecting provider material related to the audit?

- The OPI auditor will send a records request letter to collect documentation from the network provider.

If the CCO must pay OHA for provider overpayments, how does the CCO collect from the provider?

- Collecting from the subcontractor/ network provider would be the option of the CCO, and dependent on your relationship and the contract with your subcontractor/ network provider.

Why does the CCO have to pay the overpayments? It would seem that the CCO would be collecting the overpayment.

- Please refer to your 2020 contract regarding network provider audits and direct any additional questions to Cheryl Henning, OHA Contract Administrator.

When will the audits begin and how long will they take to complete?

- Audits will begin as soon as possible. The time it takes to complete an audit will vary based on the scope and complexity of the audit.

How does PIAU determine which providers to investigate or audit? Do you use analytics, tips, or other?

- We use data analytics such as data mining, fraud tips, and work with other stakeholders like MFCU to determine which providers to audit. We prioritize suspected fraud and suspicious patterns in the claims data. In the near future, we will be adding more advanced data analytical tools for looking at claims data.

If a provider was paid in a capitation methodology, how will OHA determine the amount to recoup?

- We determine the overpayment amount on a claim by claim basis using our fee-for-service fee schedule as a proxy. The CCO can provide additional information to OPI to assist in determining the overpayment.

If the CCO is also auditing the provider, it seems we should work together.

- Yes, this is why we will send a notification letter to the CCO first before beginning the audit. If the CCO has an ongoing audit at the time of notification, the CCO would inform OPI and provide details of their audit when replying to the notification letter. The CCO audit will not be interrupted. OPI will work with the CCO in sharing information as much legally possible.

For clarity, is the CCO held to 30 calendar days for documentation like the network provider?

- Yes, for consistency both the CCO and network provider will have 30 calendar days to respond. OPI will be using OAR 407-120-1505 as the basis for the audit work.

Would scope also include audits where the CCO or OHA suspects that providers are getting reimbursed by OHA and also balance billing the member?

- Yes, we investigate balance billing by sending out EOMBs on a quarterly basis as required by CMS. When we see positive EOMB responses from patients, we typically turn it into an audit or refer it to MFCU. OPI will work closely with the CCO in these circumstances as it directly involves members.

If the provider is contracted with more than one CCO, how will that work?

- If a network provider has more than one CCO, we will scope the audit to work with each CCO independently.

Will you audit individual providers, as well as clinics and hospitals?

- Yes, audits will be selected based on the resources and identification techniques mentioned above.

Will each CCO be assigned a specific auditor on the team? It will be nice to have a continued point of contact, so they develop a familiarity with providers in a service area.

- Great suggestion and we will take that into consideration.

Is the network provider offered an appeal process?

- No, appeal rights under the OARs and contract will be afforded to the CCO. Any appeals by the network provider will be based on the CCOs contract with the provider.

Can the CCO rely on the final overpayment for recoupment purposes?

- Yes, the final overpayment will be the responsibility of the CCO, and will be provided in the final audit documents. If the audit is appealed by the CCO, the final overpayment will be established after all appeals are exhausted. If not appealed by the CCO, the final overpayment is established by the final audit documents. The CCO may decide to recoup this money from their subcontractor or not, depending on contract conditions and other circumstances.

Will each CCO have the same amount of provider audits or is it random? Is there a frequency the CCOs can expect?

- At this point, it will be a random selection with fraud and suspicious activity prioritized first. The algorithms used to establish potential billing outliers will guide audit selection.

I understand the CCO reports the overpayment to OHA – I still question that the CCO first pays the overpayment to OHA. It seems like an unnecessary step. Why would we appeal this? There should be a payment plan worked out with the provider not the CCO.

- Please refer to your 2020 contract and refer questions to Cheryl Henning, OHA Contract Administrator.

Will CCOs need to report these recoupments on the quarterly FWA reports or will they be reported separately by PIAU?

- Recoupments made by the CCO are reported on the quarterly report. We will need to discuss and explore more where PIAU recoupments will be reported. Actuarial Services can also be contacted for additional guidance – the manager of that unit is Chelsea Guest. OPI will be confirming the correct methodology for CCO financial reporting.

Are all network provider overpayments required to be recouped by the CCO in all cases?

- CCOs are not required to collect overpayments from Network providers – This is up to the CCOs. OHA will recover overpayments from CCOs.

Will we receive the slides?

- Yes! The slides and Q&A will be sent to everyone and made available online on the OPI website. We will also include a link to our website with the documents sent out to participants.

Link: