
CCO Network Provider Audit & Appeal Process:

Webinar for CCO Chief Compliance Officers

Program Integrity Audit Unit (PIAU)

July 29, 2020



FISCAL AND OPERATIONS DIVISION

Office of Program Integrity

Presenters

- Introductions/Roll Call
- OHA Office of Program Integrity:
 - Fritz Jenkins, Office of Program Integrity Administrator
 - Mickaella Suarez, Program Integrity Audit Manager
 - Lea Forsman, SIU/SURS/Policy Manager

Training Content

- Purpose of the Training
- Audit Workflow
- Notification Letter
- Response Letter
- Records Request
- Documentation Review
- Preliminary Audit
- Final Audit
- Overpayment Calculation
- Administrative Notice
- Collections
- Appeals

Purpose

- To provide a high-level overview of the audit and appeal process for PIAU audits of Coordinated Care Organization (CCO) network providers.
- To walk through the audit, appeal, and collection process.
- To answer any questions you may have.

OPI Authority to Audit

- OAR 407-120-1505 – Provider and Contractor Audits, Appeals, and Post Payment Recoveries.
- CCO Contract, Exhibit B, Part 9, section 14.

CCO Network Provider Audit Workflow

- PIAU has created a workflow process for CCO network provider audits similar to the Fee-for-Service provider audits, for consistency.
- The CCO network provider audits have three distinct differences:
 - Additional communications will be sent by the Auditor, including notifications to the CCO and Health Systems Division (HSD).
 - Overpayment will be collected from the CCO.
 - The CCO will be responsible for network provider appeals.

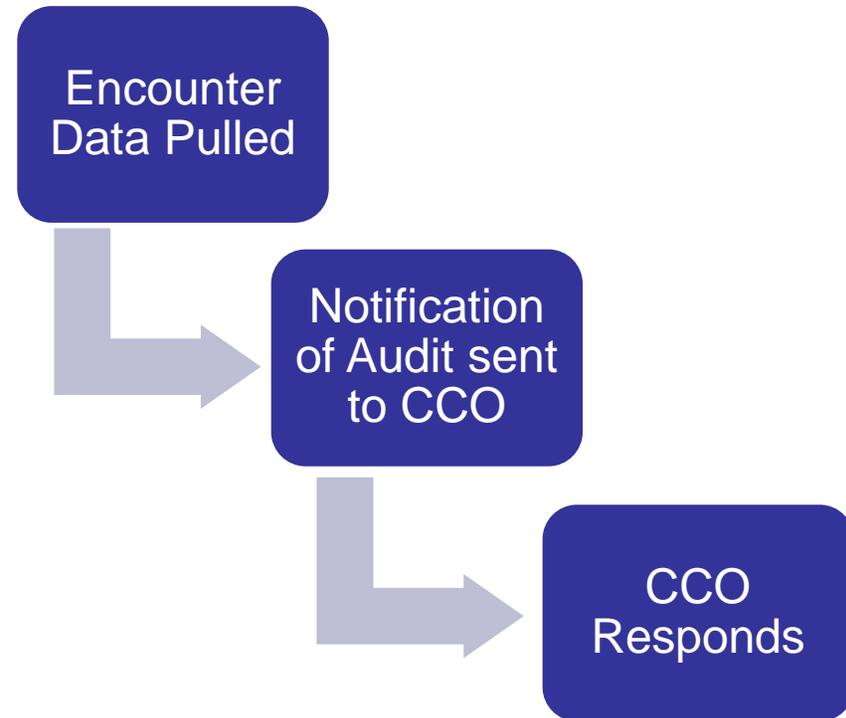
CCO Network Provider Audit Process

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Health
Authority

CCO Notification

- PIAU's research staff will pull network provider claims data.
- The Auditor will send a notification letter to the CCO's Chief Compliance Officer to ensure the network provider has not already been audited within the last 5 years.



CCO Notification

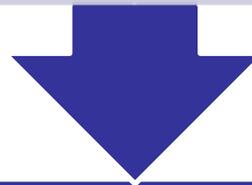
- The purpose of CCO Notification Letter is to:
 - Inform the CCO that their network provider is being audited
 - Ask the CCO if they have audited the provider in the past 5 years
 - Request documents from any past audits, and
 - Request any relevant policies and/or coverage guidance.
- The CCO will have 14 calendar days from the date of the letter to respond.
- Audit will proceed if no response is received.

CCO's Response to Notification Letter

If CCO Responds

If the CCO has audited the provider within the last 5 years, the Auditor will review the documents provided by the CCO and consult with PIAU manager.

If the provider has not been audited within the last 5 years, the Auditor will proceed with requesting records from the network provider.



Records Request Letter

Auditor sends letter to the network provider to request records

Auditor will cc CCO Chief Compliance Officer

Records Request

- The Auditor will send a record request letter to the network provider.
- A copy of the record request letter will also be cc'd to the CCO's Chief Compliance Officer.
- Once the Auditor receives documentation from the network provider, the auditor will begin their review of the documentation and complete a Preliminary Audit Report.

Preliminary Audit

Preliminary Audit Report Completed

Sent to Network Provider

cc'd to CCO Chief
Compliance Officer

- The Auditor will mail the preliminary audit report to the network provider.
- The Auditor will send a copy of the preliminary audit report to the CCO's Chief Compliance Officer.

Additional Documentation

- The network provider will have 30 calendar days from the date of the Preliminary Audit Report to send PIAU additional documentation.
- The CCO may also respond with additional documentation to assist the Auditor in completing the final audit.
- The Auditor will review and take into consideration any additional documentation provided.

Final Audit

Final Audit Report Complete

Sent to network
provider

cc'd to CCO Chief
Compliance Officer

- After reviewing the additional documentation, the Auditor will create the Final Audit Report and audit matrix.
- The Final Audit Report will be mailed to the network provider and a copy will be sent to the CCO's Chief Compliance Officer.

Overpayment Calculation

- Overpayments will be calculated using the fee-for-service fee schedule in effect on the date of service.
- Current and historical fee schedules for physical and behavioral health can be found at the link below.

<https://www.oregon.gov/oha/HSD/OHP/Pages/Fee-Schedule.aspx>

- Final Overpayment calculations will be included in the Final Audit Report.

Administrative Notice

- Administrative Notice will be sent to the CCO's contract administrator, by the Auditor, when the Final Audit Report is complete.
- The purpose of this notice is to inform the CCO
 - The audit of their network provider is complete,
 - The total overpayment which will be recovered from the CCO, and
 - The CCO's appeal rights.

Final Audit Documents

- The Final Audit Report will be sent by the Auditor to the CCO Chief Compliance Office and the CCO's Contract Administrator via secured/encrypted email with:
 - the Administrative Notice, and
 - an Accounts Receivable invoice.
- A copy of the Administrative Notice will also be provided to OHA's CCO Contract Administrator via secured/encrypted email.

Communicating the Final Audit

CCO Network Provider

- Final Audit Documents

CCO Chief Compliance Officer

- Administrative Notice
- Final Audit Documents
- Accounts Receivable Invoice

CCO Contract Administrator

- Administrative Notice
- Final Audit Documents
- Accounts Receivable Invoice

OHA Contract Administrator

- Administrative Notice

Collections from CCOs

- Account Receivable (AR) invoice will be sent by the Auditor along with Final Audit Report to CCO. The CCO will have 30 days to pay or file an appeal, OAR 407-120-1505.
- If the CCO does not file an appeal or pay within 30 days, the Auditor will request the OHA Office of Financial Services (OFS) recoup the overpayment from a future CCO payment.
- The general practice of OPI is to suspend collections/recoupments when an audit is in the appeal status.
- If the CCO requests a payment plan or a settlement agreement, the Auditor will engage PIAU management for negotiation and approval.

CCO Appeal Rights

- CCOs have the right to appeal final audits of their network provider under OAR 407-120-1505 – *Provider and Contractor Audits, Appeals, and Post Payment Recoveries*.
- If the CCO disagrees with the Final Audit Report, they may appeal the final audit decision within 30 calendar days from the date of the final audit.
 - The appeal must clearly indicate the areas of disagreement.
 - The OHA Office of Program Integrity Administrator will determine if the appeal is most suitable for an Administrative Review or a Contested Case Hearing.

Questions?