



Audit Protocol Workgroup

Rob Bremer

The CCQC Audit Procedures Workgroup has distributed its draft audit procedures recommendations for review by BHO EDs and Corporate Compliance Officers. Over the next month, the workgroup will be meeting with the BHO CCOs to develop training for CMHCs and high volume providers. The workgroup recommends that the BHOs convene a joint BHO CCO committee to implement and refine BHO compliance activities related to monitoring network providers for Medicaid fraud waste and abuse. The primary activities suggested by this workgroup are:

- Implement the use of a compliance program self assessment tool for all CMHCs and high volume providers. This tool will gather information about our CMHCs and clinic providers compliance programs. Providers with robust compliance programs who demonstrate the ability to police themselves will not merit as much compliance oversight from the BHOs. This will allow the BHOs to focus resources on important high risk areas.
- Initiate a claims review process similar to the “411” audit. This tool will add review of clinical elements, such as the treatment plan. Eventually, this process should be merged with the 411 audit. CMHC and high volume providers will conduct internal reviews. BHO will directly review other providers.
- A revised medical record documentation tool and process to be used by all the BHOs. CMHC and high volume providers will conduct internal reviews. BHOs will directly review other providers.
- Conduct an initial program review of residential, clubhouse, and inpatient services in order to develop targeted auditing tools for these types of services.

The workgroup recommends that all activities be coordinated by the BHO CCOs so that only one BHO monitors each provider and shares this information with the other BHOs. To this end, we recommend the creation of a CBHC compliance database for use by the BHO CCOs. This will increase the BHOs efficiency as well as the burden on our providers.

The workgroup has drafted recommended tools for use by all the BHOs. We anticipate the roll-out to providers as follows:

- CMHC and high volume providers are trained on the self assessment process in October and complete their assessments by the end of December.
- CMHCs and high volume providers begin internal claims review in March 2012 and medical record documentation reviews in April 2012. These will be repeated in the Fall of 2012.

The BHOs will need to approve the recommended procedures and tool before they are implemented.

Compliance Program Development

Erica Arnold-Miller

Here are the highlights from the August meeting:

- Questions regarding Federal grant sub-recipients and audit requirements – BHOs must monitor MHCs in accordance with A133 audit circular (if MHCs received \$500,000 or more in fed funds); if so, BHO will ask whether an audit was completed by MHC and whether a single audit is available. MHC will submit to BHOs for review. We are waiting for a summary based on a BHO ED discussion with HCPF to finalize this question.
- Process and form for reversal of encounters/claims – workgroup made progress on gathering information and coming up with a policy. This will be finalized at the next workgroup meeting.
- Board Presentation on Compliance – draft is nearly complete and will be finalized at next workgroup meeting.
- Review of Compliance Self-assessment Instructions – this item was deferred until the September meeting.
- Meeting updates – workgroup will have one additional meeting in September; also discussed proposed meetings for planning Compliance Officer Audit Protocol training to be scheduled in October.

September Training:

September 13-14 : Train-the-Trainer, presented by Mary Thornton.

The Basic Documentation and Training Committee will provide a basic documentation guide and training materials to train new and existing staff.

Who should attend? Two trainers from each CMHC/BHO should be identified. You will be notified when registration is open for this training. **Currently, 70 people are registered.**

High Risk Workgroup

Julie Kellaway

At the August 23, 2011, meeting, the workgroup completed the slide presentation on treatment planning for training that took place on August 26.

There was a great turn out for this educational opportunity and we received positive feedback from the all-day event. At the September 15, meeting, the workgroup will complete the notes and add the final touches from the August training. All the updated information will be posted on the CBHC/CCQC website. The group is ready to start the work on the next trainings.

There is much work to be completed in the next six months. To this end, we have added new members for the purpose of apportioning the workload and to add additional expertise.

Following is a list of the teams as well as the appointed leads that will be working on the three final trainings for the High Risk

Workgroup. Please note the dates for training have been changed. Details for the trainings will soon be on the CBHC website.

Rehabilitation Services – Scheduled for December 1-2, 2011. Location: Community Reach Center, Northglenn Office, 11285 Highline Drive, Northglenn.

Team Members:
Darla Gurry – Lead
Phyllis Benedetti-Sitzman
Ann Fleming

We are looking for one more volunteer. If anyone has expertise in this area and would like to join this workgroup, please let Charlotte Yianakopoulos-Veatch (charlotty@spanishpeaks.org) know.

Children/Family Services (In-Home) – Scheduled for January 10, 2012. Location: Pueblo

(place to be determined).

Team Members:
Debbie Keairnes – Lead
Kay Martin
Laura Updike

B-3 Services – Scheduled for February 23, 2011. Location: Community Reach Center, Northglenn Office, 11285 Highline Drive, Northglenn.

Team Members:
Mark White – Lead
Susan Peters
Haline Grublak

We are looking for one more volunteer. If anyone has expertise in this area and would like to join this workgroup, please let Charlotte Yianakopoulos-Veatch (charlottey@spanishpeaks.org) know.

All educational material can be located on the CBHC website (cbhc.org) under the CCQC link.

CBHC is dedicating a section on their website to CCQC. Check it out at cbhc.org. Click on the “CCQC” tab at the top of the homepage. Thank you to Brian Turner for his work on the website!

Coding Manual Workgroup

Barb Mettler & Karen Thompson

The Coding Manual Workgroup has reviewed concerns and parking lot issues with the Uniform Service Coding Manual. The manual has been officially updated by HCPF and can be found on the following website:

(<http://www.colorado.gov/cs/Satellite?c=Page&childpagename=HCPF%2FHCPFLayout&cid=1251569171131&pagename=HCPFWrapper>)

Looking for... Training Info? Registration Info? Compliance Resources? Calendar of Events?

Click on <http://www.cbhc.org/> and go to the CCQC tab.

If you have any questions, comments or concerns, please contact:
Charlotte Yianakopoulos-Veatch:
charlottey@spmhc.org
or Kari Snelson: karis@wcmhc.org.