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Project Background

The Medicaid Care Management Organizations Act (the Act) requires the care management organizations (CMOs) to provide a Hospital Statistical and Reimbursement (HS&R) report within 30 days upon request of a provider. Specifically, the Official Code of Georgia Annotated (O.C.G.A.) 33-21A-11 states:

Upon request by a hospital provider related to a specific fiscal year, a care management organization shall, within 30 days of the request, provide that hospital with an HS&R report for the requested fiscal year. Any care management organization which violates this Code section by not providing the requested report within 30 days shall be subject to a penalty of \$1,000.00 per day, starting on the thirty-first day after the request and continuing until the report is provided. It is the intent of the General Assembly that such penalty be collected by the Department of Community Health and deposited into the Indigent Care Trust Fund created pursuant to Code Section 31-8-152. A care management organization shall not reduce the funding available for health care services for members as a result of payment of such penalties.

Additionally, the CMOs must submit a list of the requested HS&R reports to the Department of Community Health (the Department or DCH) no later than 30 days following the calendar quarter period.

Objective

As requested by the Department, Myers and Stauffer LC (Myers and Stauffer) tested the data on the quarterly HS&R reports submitted by the CMOs in response to the "Act" for the quarter beginning January 1, 2023 and ending March 31, 2023 ("Quarter 1"). We attempted to confirm the information reported by the CMOs to demonstrate their compliance with the HS&R reporting requirements of the "Act".

The quarterly HS&R reports submitted to the Department by the CMOs contain the following data: the identification of hospitals that requested HS&R reports including location, name of report requestor, date the HS&R report(s) were requested, the date the CMO released the report to the hospital or requestor, and other related information.

HS&R reports were randomly selected for Peach State Health Plan and the corresponding providers were contacted for confirmation of the dates reported by the CMOs. The Methodology section provides an overview of how we analyzed the data on the quarterly reports.



Methodology

In order to perform this analysis, we utilized the quarterly reports submitted to DCH by Peach State Health Plan. Peach State Health Plan's report was obtained by accessing their web portal on May 1, 2023. For Quarter 1, 40 HS&R reports were submitted and can be found in Exhibit A of this report.

In accordance with the validation process approved by DCH, Myers and Stauffer requests confirmation of the CMO reported request and release dates from providers or their representatives. Using the HS&R reports provided by Peach State Health Plan, we sampled no less than 17 report requests.

Telephone calls or emails regarding 17 HS&R reports were initiated on July 12, 2023 and completed on July 20, 2023. Providers were asked to provide the date they requested the HS&R report and the CMOprovided notification that the report was available.

A maximum of three attempts per provider were performed in an effort to acquire data for this analysis. Once the data was collected, we analyzed the results and performed follow-up communication with Peach State Health Plan or the provider, as necessary. Provider responses were compared with the dates reported on each CMO's quarterly report.

Assumptions and Limitations

The assumptions and limitations summarized below should be noted when reviewing this report.

- Our procedures were not designed to identify instances where Peach State Health Plan may have failed to include a provider's request for an HS&R report in the report to DCH. However, had instances occurred where a provider stated they requested an HS&R report from Peach State Health Plan that was not included in the report to DCH, Myers and Stauffer would have communicated with Peach State Health Plan to confirm the information obtained from the provider.
- Myers and Stauffer accepted a verbal or email confirmation for information received from providers.
- If there was a disagreement between Peach State Health Plan and the provider, Myers and Stauffer accepted the documentation submitted by Peach State Health Plan as confirmation.
- If instances occurred where a provider stated they received a requested HS&R report from Peach State Health Plan after 20 days and that report was originally excluded from our confirmation process, we would have communicated with Peach State Health Plan to confirm the information obtained from the provider.
- As instructed by the Department, if the due date of the report (30 days after the report was requested) fell on a Saturday or Sunday, the next business day was assumed to be the due date for purposes of this analysis.



Report Results

This section provides the results of the analysis of the Quarter 1, 2023 HS&R report.

Table 1. Report Analysis

СМО	Reports - Requested	Reports - Released Greater Than 30 Days	Sample Reports	Reports - Confirmed	Reports - Disagreed	Unable to Reach
Peach State Health Plan	40	1	17	17 (100%)	0 (0.0%)	0 (0.0%)

An overview of the analysis is included in Table 1. For this analysis, 18 out of 40 HS&R reports were sampled. The results indicate information reported by Peach State Health Plan was confirmed for 100 percent (18 of 18) of the HS&R reports.

Table 2. Length of Time between Request and Release Dates for HS&R Report Requests

СМО	Minimum	Average	Maximum
Peach State Health Plan	0.0	3.29	38

The statistics included in Table 2 are based on the request and release dates reported by Peach State Health Plan for Quarter 1. The minimum number of days taken to release an HS&R report to a provider was zero days, while the maximum number of days taken to release an HS&R report to a provider was 38 days.

Findings

For Quarter 1, eight representatives were contacted regarding 17 HS&R reports. The request and release dates reported by Peach State were confirmed for the 17 HS&R reports. Myers and Stauffer did identify one HS&R report that was released by Peach State that was greater than 20 days.

Myers and Stauffer also identified one HS&R report released by Peach State that was greater than 30 days. We contacted Peach State in order to validate the HS&R report release date. The compliance representative provided the response as follows:

"The date the report was requested was 03/09/2023 and the date that Peach State Health Plan released the report was 04/18/2023. The report request was inadvertently overlooked in the central email box where we receive all HS&R requests. We discovered the missed request on 04/18/2023, and promptly ran the report and released to the requestor. In order to prevent inadvertently missing HS&R requests going forward, we audit the central email box on a weekly basis to ensure reports have been sent to the requestor. "



Please refer to *Table 3* for details on the late report with potential penalties.

Summary of Potential Penalties

Based on the findings, there are potential penalties for late reporting that DCH may elect to assess for the Quarter 1, beginning January 1, 2023 and ending March 31, 2023.

For the one instance of late reporting, eight days (per instance) were determined to be late. O.C.G.A. 33-21A-11) states, "...Any care management organization which violates this Code section by not providing the requested report within 30 days shall be subject to a penalty of \$1,000.00 per day, starting on the thirty-first day after the request and continuing until the report is provided."

Pursuant to the statutory and contractual requirements, DCH may elect to impose a penalty of \$8,000 on Peach State.

Table 1. Total Number of Late Reports with Potential Penalties

Peach State							
No.	Provider Name	Date Report Requested	Date Report Released	Days Late	Potential Penalty		
1	Southwell Medical Center (Cook Medical)	3/9/2023	4/18/2023	8	\$8,000.00		

Recommendations

We make the following recommendations to DCH and the CMOs based on our findings after analyzing the Quarter 1, 2023 HS&R report:

- The Department may wish to assess a penalty of \$8,000.00 against Peach State for the HS&R reports which were not released within 30 days.
- Peach State should review their processes and procedures to ensure all HS&R report requests are accurately produced and sent to the requesting provider within the required 30-day time period.



Exhibit A: Peach State Health Plan Quarterly Report

HS&R Report Quarterly Report

CMO Name: Peach State Health Plan

Reporting Date: 4/30/23

Reporting Period: 1/1/2023 - 3/31/2023

Hospital Name	Location	Date Report Requested	Date Report Released	Requester's Name
Archbold Memorial Hospital	915 Gordon Ave, Thomasville, GA 31792	1/8/2023	1/9/2023	Shae S Foy
Hamilton Medical Center	1200 Memorial Dr, Dalton, GA 30720	1/8/2023	1/9/2023	Shae S Foy
Archbold Memorial Hospital	915 Gordon Ave, Thomasville, GA 31792	1/9/2023	1/9/2023	Patricia L. Barrett
Southeast Medical Center	1108 Ross Clark Cir, Dothan, AL 36301	1/10/2023	1/11/2023	Lisa Payne
Mitchell County Hospital	90 E Stephens St, Camilla, GA 31730	1/10/2023	1/24/2023	Patricia L. Barrett
Grady General Hospital	1155 5th St SE, Cairo, GA 39828	1/10/2023	1/24/2023	Patricia L. Barrett
Brooks County Hospital	903 N Ct St, Quitman, GA 31643	1/10/2023	1/24/2023	Patricia L. Barrett
Notheast Georgia Medical Center	743 Spring St NE, Gainesville, GA 30501	1/11/2023	1/11/2023	Shae S Foy
NGMC Barrow	316 N Broad St, Winder, GA 30680	1/11/2023	1/11/2023	Shae S Foy
Braselton Hospital	1400 River Pl, Braselton, GA 30517	1/11/2023	1/11/2023	Shae S Foy
NGMC Lumpkin	227 Mountain Dr, Dahlonega, GA 30533	1/11/2023	1/11/2023	Shae S Foy
Jefferson Hospital	1067 Peachtree St, Louisville, GA 30434	1/12/2023	1/12/2023	Shae S Foy
Tift Regional Medical Center	901 East 18th St, Tifton GA 31794	1/12/2023	1/20/2023	Shae S Foy
Appling Hospital	163 E Tollison St, Baxley, GA 31513	1/12/2023	1/12/2023	Shae S Foy
Colquitt Regional Medical Center	3131 S Main St, Moultrie, GA 31768	1/12/2023	1/12/2023	Shae S Foy
Haberham Medical	541 Historic Highway 441, Demorest, GA 30535	1/13/2023	1/13/2023	Jessica Turner
	1221 E Mcpherson Ave, Nashville, GA			
SGMC Berrien Campus	31639	1/13/2023	1/13/2023	Shae S Foy
SGMC Lanier	116 W Thigpen Ave, Lakeland GA 31635	1/13/2023	1/13/2023	Shae S Foy
Smith NorthView	4280 N Valdosta Rd, Valdosta, GA 31602	1/13/2023	1/13/2023	Shae S Foy
South Georgia Medical	2501 N Patterson St, Valdosta GA 31602	1/13/2023	1/13/2023	Shae S Foy
Tanner Medical Center - Carrollton	705 Dixie St, Carrollton, GA 30117	1/16/2023	1/17/2023	Shae S Foy

HS&R Report Quarterly Report

CMO Name: Peach State Health Plan

Reporting Date: 4/30/23

Reporting Period: 1/1/2023 – 3/31/2023

Hospital Name	Location	Date Report Requested	Date Report Released	Requester's Name
Tanner Medical Center - Villa Rica	601 Dallas Hwy, Villa Rica, GA 30180	1/16/2023	1/17/2023	Shae S Foy
Upson Regional Medical Center	801 West Gordon St, Thomaston, GA 30286	1/16/2023	1/17/2023	April Williams
	462 Elma G Miles Pkwy, Hinesville, GA			
Liberty Regional Medical Center	31313	1/19/2023	1/20/2023	Heather Dyer
Monroe County Hospital	88 MLK Jr Dr, Forsyth, GA 31029	1/24/2023	1/24/2023	Katie Stalvey
	101 Lake Oconee Pkwy, Eatonton, GA			
Putnam General Hospital	31024	1/24/2023	1/24/2023	Katie Stalvey
South Georgia Medical Center	2501 N Patterson St, Valdosta, GA 31602	1/26/2023	1/27/2023	Laura Stair
SGMC Hospital Authority of Valdosta and				
Lowndes County	4280 N Valdosta Rd, Valdosta, GA 31602	1/26/2023	1/27/2023	Laura Stair
Lifebrite Community Hospital of Early	11740 Columbia Street, Blakely, GA 39823	1/30/2023	1/30/2023	Ginger Cushing
Dodge County Hospital	901 Griffin Ave, Eastman, GA 31023	2/3/2023	2/3/2023	Joan Hartley
Dodge County Hospital	901 Griffin Ave, Eastman, GA 31023	2/8/2023	2/9/2023	Joan Hartley
Colquitt Regional Medical Center	3131 S Main St, Moultrie, GA 31768	2/9/2023	2/9/2023	Matt Atkins
Southeast GA Health System - Brunswick	2415 Parkwood Drive, Brunswick, GA 31520	2/21/2023	2/27/2023	Michelle Morris
Southeast GA Health System - Camden	2000 Dan Proctor Dr, Saint Marys, GA 31558	2/21/2023	2/27/2023	Michelle Morris
Jasper Memorial Hospital	915 Gordon Ave, Thomasville, GA 31792	2/22/2023	2/27/2023	Jake Kitchens
Upson Regional Medical	1200 Memorial Dr, Dalton, GA 30720	2/23/2023	2/27/2023	April Williams
Southwell Medical Center (Cook Medical)	915 Gordon Ave, Thomasville, GA 31792	3/9/2023	4/18/2023	Shae S Foy
Jefferson Hospital	1108 Ross Clark Cir, Dothan, AL 36301	3/13/2023	3/13/2023	Keith Williams
Burke Medical Center	90 E Stephens St, Camilla, GA 31730	3/13/2023	3/14/2023	Keith Williams
Liberty Regional	1155 5th St SE, Cairo, GA 39828	3/21/2023	3/21/2023	Heather Dyer