

The background features a blurred image of a person's arm and hand, overlaid with a green geometric pattern of hexagons and lines. Various medical icons are scattered throughout, including a syringe, a pill, a stethoscope, a microscope, a group of people, and a cross. The text is positioned on the right side of the page, set against a dark grey background.

GEORGIA DEPARTMENT OF COMMUNITY HEALTH

Hospital Statistical and
Reimbursement (HS&R) Report
Timeliness Validation

CareSource

Quarter 3: July 2022 – September 2022

March 27, 2023



**MYERS AND
STAUFFER**_{LC}
CERTIFIED PUBLIC ACCOUNTANTS



Table of Contents

■ Table of Contents.....	1
■ Project Background.....	2
• Objective	2
• Methodology	3
• Assumptions and Limitations	3
■ Report Results.....	4
• Findings	4
• Summary of Potential Penalties	5
• Recommendations	6
■ Exhibit A: CareSource Quarterly Report	7
■ Exhibit B: CareSource Quarterly Report (Revised).....	8



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 3, beginning July 1, 2022 and ending September 30, 2022. 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 CareSource contain the following data: the identification of hospitals that requested HS&R reports including location, name of report requester, date the HS&R report(s) were requested, the date the CMO released the report to the hospital or requester, and other related information.

HS&R reports were randomly selected for CareSource to contact providers 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 CareSource. CareSource's report was obtained by accessing their web portal on November 8, 2022. For Quarter 3, 10 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 CareSource, we sampled no less than nine report requests.

Telephone calls or emails regarding nine HS&R reports were initiated on November 8, 2022 and completed on November 18, 2022. Providers were asked to provide the date they requested the HS&R report and the CMO-provided 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 CareSource or the provider, as necessary. Provider responses were compared with the dates reported on CareSource'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 CareSource 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 CareSource that was not included in the report to DCH, Myers and Stauffer would have communicated with CareSource to confirm the information obtained from the provider.*
- *Myers and Stauffer accepted a verbal or an email confirmation for information received from providers.*
- *If there was a disagreement between CareSource and the provider, Myers and Stauffer accepted the documentation submitted by CareSource as confirmation.*
- *If instances occurred where a provider stated they received a requested HS&R report from CareSource after 20 days and that report was originally excluded from our confirmation process, we would have communicated with CareSource 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 3 2022 HS&R report.

Table 1. Report Analysis

CMO	Reports - Requested	Reports - Released Greater Than 30 Days	Sample Reports	Reports - Confirmed	Reports - Disagreed	Unable to Reach
CareSource	10	3	9	6 (66.7%)	3 (33.3%)	0 (0.0%)

An overview of the analysis is included in *Table 1*. For this analysis, nine out of 10 HS&R reports were sampled results indicate information reported by CareSource was confirmed for 66.7 percent (six of nine) of the HS&R reports.

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

CMO	Minimum	Average	Maximum
CareSource	0	21.9	41

The statistics included in *Table 2* are based on the request and release dates reported by CareSource for Quarter 3. 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 41 days.

Findings

During our analysis, Myers and Stauffer identified that CareSource submitted the Quarter 3 report with the correct reporting period. In addition, six representatives were contacted regarding nine HS&R report requests. The request and release dates reported by CareSource were confirmed for nine requests. We identified six HS&R reports released by CareSource to a provider that were greater than 20 days.

We identified three HS&R reports released by CareSource greater than 30 days. We contacted CareSource in order to validate the HS&R report release dates. The compliance representative provided the response as follows:

“We have revised the header on the Q3 HS&R report to correct the reporting period and uploaded it to the M&S SFTP site.

The 3 line items cited in your email have a release date of 9/22/22, and after further information was provided, we submitted the reports to the Provider again on 10/13/22. We received the original request from the Provider on 9/1/22 request, asking for “payments as of 8/31/2022”. When most providers request data they will give the “from date” and request to “current,” which



would be the release date. On 9/22/22, CareSource responded with the requested reports with payment dates 8/31/22 – 9/30/22. The Provider sent a follow-up email to us on 9/26/22 requesting payment dates 1/1/21 – 8/31/22. On 10/13/22, CareSource sent a second response with the requested reports with payment dates 1/1/21 – 8/31/22.

The email submission for 9/22/22 is attached as evidence: *\$secure* RE: HS&R REQUESTS - CareSource 2021.

CareSource reports the release date as the day we respond/the original submission date. If the State wants to see subsequent submission dates, we can absolutely provide that in our reporting going forward. On the Q3 HS&R report resubmission, I added a note in the release date column for each of these lines stating that subsequent reports were submitted on 10/13/22.”

After review of CareSource’s response and the documentation provided, we have determined the reports were released to the provider late. The provider requested the payment dates of 1/1/21 – 8/31/22, while CareSource provided 8/31/2022 – 9/22/2022. The provider contacted CareSource on 9/26/2022 to advise that the payment dates on the reports provided were incorrect. CareSource provided the revised reports with the correct payment dates on 10/13/2022. Because CareSource provided the revised reports outside of the 30-day time period, the reports will be deemed as late.

Please refer to *Table 3* for a detailed listing of the late reports 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 3, beginning July 1, 2022 and ending September 30, 2022.

For the three instances of late reporting, 11 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 \$33,000.00 on CareSource.



Table 3. Total Number of Late Reports with Potential Penalties

CareSource					
No.	Provider Name	Date Report Requested	Date Report Released	Days Late	Potential Penalty
1	Children’s Healthcare of Atlanta @ Egleston	9/1/2022	10/13/2022	11	\$11,000.00
2	Children’s Healthcare of Atlanta @ Scottish Rite	9/1/2022	10/13/2022	11	\$11,000.00
3	Children’s Healthcare of Atlanta @ Hughes Spalding	9/1/2022	10/13/2022	11	\$11,000.00

Recommendations

We make the following recommendations to DCH and the CMOs based on our findings after analyzing the Quarter 3, 2022 HS&R report:

- *The Department may wish to assess a penalty of \$33,000 against CareSource for the HS&R reports which were not released within 30 days.*
- *CareSource 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.*
- *CareSource should perform quality review of all reports for accuracy before submission to DCH.*



Exhibit A: CareSource Quarterly Report

HS&R Report Quarterly Report				
CMO Name: CareSource				
Reporting Date: 10/28/22				
Reporting Period: 7/1/2022 – 9/30/2022				
Hospital Name	Location	Date Report Requested	Date Report Released	Requester's Name
Bleckley Memorial Hospital	Cochran	7/7/2022	7/11/2022*	Elisabeth Pak
Taylor Regional Hospital	Hawkinsville	7/7/2022	7/11/2022	Elisabeth Pak
South Georgia Health System – Brunswick Campus	Brunswick	7/14/2022	7/20/2022	Michelle Morris
Jeff Davis Hospital	Hazlehurst	7/28/2022	8/19/2022	Tiffany Hulett
Emanuel Medical Center	Swainsboro	8/16/2022	8/19/2022	William Sherman
Egleston	Atlanta	9/1/2022	9/22/2022	Jessica Shin
Scottish Rite	Atlanta	9/1/2022	9/22/2022	Jessica Shin
Hughes Spalding	Atlanta	9/1/2022	9/22/2022	Jessica Shin
Emory University Hospital	Atlanta	9/1/2022	9/28/2022	Joseph Peggram
Emory Midtown Hospital	Atlanta	9/1/2022	9/28/2022	Joseph Peggram

*There were no Medicaid and PCK claims for the requested service and payment dates. Subsequently, no HS&Rs were provided. CareSource was not in operation for the service dates requested. Subsequently, no HS&Rs were provided.



Exhibit B: CareSource Quarterly Report (Revised)

**HS&R Report
Quarterly Report**

CMO Name: CareSource
Reporting Date: 12/14/2022
Reporting Period: 7/1/2022 – 9/30/2022

Hospital Name	Location	Date Report Requested	Date Report Released	Requester's Name
Bleckley Memorial Hospital	Cochran	7/7/2022	7/11/2022*	Elisabeth Pak
Taylor Regional Hospital	Hawkinsville	7/7/2022	7/11/2022	Elisabeth Pak
South Georgia Health System – Brunswick Campus	Brunswick	7/14/2022	7/20/2022	Michelle Morris
Jeff Davis Hospital	Hazlehurst	7/28/2022	8/19/2022	Tiffany Hulett
Emanuel Medical Center	Swainsboro	8/16/2022	8/19/2022	William Sherman
Egleston	Atlanta	9/1/2022	9/22/2022	Jessica Shin
Scottish Rite	Atlanta	9/1/2022	9/22/2022	Jessica Shin
Hughes Spalding	Atlanta	9/1/2022	9/22/2022	Jessica Shin
Emory University Hospital	Atlanta	9/1/2022	9/28/2022	Joseph Peggram
Emory Midtown Hospital	Atlanta	9/1/2022	9/28/2022	Joseph Peggram

*There were no Medicaid and PCK claims for the requested service and payment dates. Subsequently, no HS&Rs were provided. CareSource was not in operation for the service dates requested. Subsequently, no HS&Rs were provided.