# GEORGIA DEPARTMENT OF COMMUNITY HEALTH

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

CareSource

Quarter 4: October 2022 – December 2022

MED

April 14, 2023





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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 4, beginning October 1, 2022 and ending December 31, 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 January 30, 2023. For Quarter 4, 38 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 24 report requests.

Telephone calls or emails regarding 24 HS&R reports were initiated on February 17, 2023 and completed on March 29, 2023. 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 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 4 2022 HS&R report.

СМО	Reports - Requested	Reports - Released Greater Than 30 Days	Sample Reports	Reports - Confirmed	Reports - Disagreed	Unable to Reach	
CareSource	38	12	24	24 (100.0%)	0 (0.0%)	0 (0.0%)	

#### Table 1. Report Analysis

An overview of the analysis is included in

*Table* **1**. For this analysis, 24 out of 38 HS&R reports were sampled results indicate information reported by CareSource was confirmed for 100 percent (24 of 24) of the HS&R reports.

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

СМО	Minimum	Average	Maximum
CareSource	26	31.1	38

The statistics included in *Table 2* are based on the request and release dates reported by CareSource for Quarter 4. The minimum number of days taken to release an HS&R report to a provider was 26 days, while the maximum number of days taken to release an HS&R report to a provider was 38 days.

### **Findings**

During our analysis, Myers and Stauffer identified that CareSource submitted the Quarter 4 report with the correct reporting period. In addition, seven representatives were contacted regarding 24 HS&R report requests. The request and release dates reported by CareSource were confirmed for 24 requests. Myers and Stauffer identified 38 HS&R reports released by CareSource to a provider that were greater than 20 days.

We identified 12 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:

"In response to your request, please be advised that the health plan can confirm that the report request and release dates are accurate. Further review of the requests confirmed that the health plan resource assumed a thirty (30) day timeframe between the request date and the response date. For example, the request was received on October 3, 2022 and delivered on November 3, 2022 without taking into account months that have more than thirty (30) days. Moreover, the resource did not adhere to the health plan's policy with respect to tracking requests from receipt



through delivery. The resource has since left the organization and the assigned health plan representative has been appropriately trained on health plan policy. Lastly, the health plan is working toward delivering HS&R Reports well in advance of the statutorily mandated thirty (30) days in an effort to avoid future issues surrounding delivery."

After review of CareSource's response and the documentation provided, we have determined the reports were released to the provider 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 4, beginning October 1, 2022 and ending December 31, 2022.

For the 12 instances of late reporting, 41 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 \$41,000.00 on CareSource.

	CareSource							
No.	Provider Name	Date Report Requested	Date Report Released	Days Late	Potential Penalty			
1	Hamilton Medical Center	10/3/2022	11/3/2022	1	\$1,000.00			
2	TMC/Higgins General Hospital, Inc.	10/3/2022	11/3/2022	1	\$1,000.00			
3	Jefferson Hospital – Louisville, GA	10/5/2022	11/5/2022	1	\$1,000.00			
4	Flint River Hospital – Montezuma, GA	10/5/2022	11/5/2022	1	\$1,000.00			
5	Jeff Davis Hospital – Hazlehurst, GA	10/5/2022	11/5/2022	1	\$1,000.00			
6	John D. Archbold Memorial Hospital	10/24/2022	12/1/2022	8	\$8,000.00			
7	Brooks County Hospital	10/24/2022	12/1/2022	8	\$8,000.00			
8	Grady General Hospital	10/24/2022	12/1/2022	8	\$8,000.00			
9	Mitchell County Hospital	10/24/2022	12/1/2022	8	\$8,000.00			
10	Elbert Memorial Hospital	11/14/2022	12/15/2022	1	\$1,000.00			
11	Elbert Memorial Hospital	12/14/2022	1/15/2023	2	\$2,000.00			
12	SGMC - Berrien Campus	12/21/2022	1/21/2023	1	\$1,000.00			

#### Table 3. Total Number of Late Reports with Potential Penalties



### **Recommendations**

We make the following recommendations to DCH and the CMOs based on our findings after analyzing the Quarter 4, 2022 HS&R report:

- The Department may wish to assess a penalty of \$41,000.00 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.



# **Exhibit A: CareSource Quarterly Report**

	HS&R Report Quarterly Report					
CMO Name: CareSource Reporting Date: 1/30/23 Reporting Period: 10/1/2022 – 12/31/2022						
Hospital Name	Location	Date Report Requested	Date Report Released	Requester's Name		
Stephens County Hospital	Тоссоа	10/2/2022	11/1/2022	Jesus Ruiz		
*Candler County Hospital	Metter	10/2/2022	11/1/2022	Jesus Ruiz		
Appling Hospital	Baxley	10/2/2022	11/1/2022	Jesus Ruiz		
Washington County Regional Medical Center	Sandersville	10/2/2022	11/1/2022	Jesus Ruiz		
Southwell Medical Center	Adel	10/2/2022	11/1/2022	Jesus Ruiz		
Tift Regional Medical Center	Tifton	10/2/2022	11/1/2022	Jesus Ruiz		
Hamilton Medical Center	Dalton	10/3/2022	11/3/2022	Jordan Wilkey		
*TMC/Tanner East Alabama, Inc.	Wedowee, AL	10/3/2022	11/3/2022	Keri McDonald		
TMC/Higgins General Hospital, Inc.	Bremen	10/3/2022	11/3/2022	Keri McDonald		
Jefferson Hospital – Louisville, GA	Louisville	10/5/2022	11/5/2022	Keith Williams		
Flint River Hospital – Montezuma, GA	Montezuma	10/5/2022	11/5/2022	Keith Williams		
Jeff Davis Hospital – Hazlehurst, GA	Hazlehurst	10/5/2022	11/5/2022	Keith Williams		
*Jenkins County Hospital – Millen, GA	Millen	10/5/2022	11/5/2022	Keith Williams		
Emory University Hospital	Atlanta	10/11/2022	11/10/2022	Joseph Peggram		
*Emory University Hospital Midtown	Atlanta	10/11/2022	11/10/2022	Joseph Peggram		
Burke Medical Center	Waynesboro	10/19/2022	11/18/2022	Lewis Cantrell		
Tanner Medical Center - Carrolton	Carrollton	10/24/2022	11/23/2022	Shae Foy		
Tanner Medical Center - Villa Rica	Villia Rica	10/24/2022	11/23/2022	Shae Foy		
Crisp Regional Hospital	Cordele	10/24/2022	11/23/2022	Darin Reed		
John D. Archbold Memorial Hospital	Thomasville	10/24/2022	12/1/2022	Patricia Barrett		
Brooks County Hospital	Quitman	10/24/2022	12/1/2022	Patricia Barrett		
Grady General Hospital	Cairo	10/24/2022	12/1/2022	Patricia Barrett		
Mitchell County Hospital	Camilla	10/24/2022	12/1/2022	Patricia Barrett		



HS&R Report Quarterly Report						
CMO Name: CareSource Reporting Date: 1/30/23 Reporting Period: 10/1/2022 – 12/31/2022						
Hospital Name	Location	Date Report Requested	Date Report Released	Requester's Name		
"*Southeast Georgia Health System - Brunswick Campus	Brunswick	10/31/2022	12/2/2022	Michelle Morris		
"*Southeast Georgia Health System - Camden Campus	Camden	10/31/2022	12/2/2022	Michelle Morris		
Elbert Memorial Hospital	Elberton	11/14/2022	12/15/2022	Jake Kitchens		
Crisp Regional Hospital	Cordele	11/23/2022	12/19/2022	Darin Reed		
John D. Archbold Memorial Hospital	Thomasville	11/30/2022	12/29/2022	Patricia Barrett		
Washington County Regional Medical Center	Sandersville	12/7/2022	1/6/2023	Jesus Ruiz		
Stephens County Hospital	Тоссоа	12/8/2022	1/7/2023	Jesus Ruiz		
Phoebe Worth Medical Center	Sylvester	12/12/2022	1/11/2023	Rebecca Kendall		
Phoebe Putney Memorial Center	Albany	12/12/2022	1/11/2023	Rebecca Kendall		
Phoebe Sumter Medical Center	Americus	12/12/2022	1/11/2023	Rebecca Kendall		
Appling Hospital	Baxley	12/12/2022	1/11/2023	Savannah Sartain		
Elbert Memorial Hospital	Elberton	12/14/2022	1/15/2023	Jake Kitchens		
Dorminy Medical Center	Fitzgerald	12/15/2022	1/14/2023	Clae Wynn		
SGMC - Berrien Campus	Nashville	12/21/2022	1/21/2023	Laura Stair		
SGMC - Lanier Campus	Lakeland	12/23/2022	1/21/2023	Laura Stair		

\*There were no Medicaid and <sup>i</sup>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.

<sup>i</sup> PeachCare for Kids<sup>®</sup>