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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 (thirty) days upon request of a provider. Specifically, 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 thirty 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 April 1, 2020 and ending June 30, 2020 ("Quarter 2"). 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 Amerigroup, CareSource, Peach State, and WellCare 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 each of the CMOs. WellCare's report was obtained by accessing their web portal on November 2, 2020. Amerigroup, CareSource, and Peach State Health Plan's reports were obtained by accessing their web portals on October 27, 2020. For Quarter 2, 81 HS&R reports were submitted by the CMOs and can be found in Exhibit B 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 each CMO, we sampled no less than eighteen report requests for each CMO.

Telephone calls or e-mails regarding 75 HS&R reports were initiated on December 9, 2020 and completed on January 5, 2021. Providers were asked to provide the date they requested the HS&R report and the date 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 the CMOs or 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 a CMO may have failed to include a provider's request for an HS&R report in the CMO's report to DCH. However, had instances occurred where a provider stated they requested an HS&R report from a CMO that was not included in the CMO's report to DCH, Myers and Stauffer would have communicated with the respective CMO 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 the CMO and provider, Myers and Stauffer accepted the documentation submitted by the CMO as confirmation.
- If instances occurred where a provider stated they received a requested HS&R report from a CMO after 20 days and that report was originally excluded from our confirmation process, we would have communicated with the respective CMO 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 HS&R reports.

Table I. Report Analysis

СМО	Reports - Requested	Reports - Released Greater Than 30 Days	Sample Reports	Reports - Confirmed	Reports - Disagreed	Unable to Reach
Amerigroup	25	8	19	17 (89.5%)	0 (0.0%)	2 (10.5%)
CareSource	18	0	18	18 (100.0%)	0 (0.0%)	0 (0.0%)
Peach State	19	0	19	16 (84.2%)	0 (0.0%)	3 (15.8%)
WellCare	19	0	19	16 (84.2%)	0 (0.0%)	3 (15.8%)
Total	81	8	75	67 (89.3%)	0 (0.0%)	8 (10.7%)

For the Quarter 2 analysis, 75 out of 81 HS&R reports were sampled. The results indicate information reported by the CMOs was confirmed for 89.3 percent (67 of 75) of the HS&R reports. Providers were deemed unreachable after three contact attempts were made representing 10.7 percent (8 of 75) in the sample.

Table II. Length of Time between Request and Release Dates for HS&R Reports, as reported per CMO

	Days Between Request and Release Dates				
СМО	Minimum	n Average Maximum			
Amerigroup	2.0	25.7	50.0		
CareSource	0.0	3.6	8.0		
Peach State	0.0	0.1	5.0		
WellCare	0.0	27.7	29.0		

The statistics included in Table II are based on the request and release dates reported by the CMOs for Quarter 2. For the CMOs combined, the minimum number of days a HS&R report was released to a provider was zero days and the maximum number of days a HS&R report was released to a provider was 50 days.



Findings

Amerigroup

For Quarter 2, Myers and Stauffer contacted 13 representatives regarding 19 HS&R report requests. We identified 17 HS&R reports released by Amerigroup to a provider that were greater than 20 days. The request and release dates reported by the CMO were confirmed for 17 requests. We were unable to confirm two report requests as two providers were deemed unreachable after contact was initiated three times. We identified eight HS&R reports where the release date was greater than 30 days (see Table III). The details of these requests can be found in Exhibit A.

CareSource

For Quarter 2, Myers and Stauffer did not identify any HS&R reports released by CareSource to a provider that were greater than 30 days. Eleven representatives were contacted regarding 18 HS&R report requests. Myers and Stauffer did not identify any HS&R reports released by CareSource that were greater than 20 days. The request and release dates reported by the CMO were confirmed for 18 requests.

Peach State Health Plan

For Quarter 2, Myers and Stauffer did not identify any HS&R reports released by Peach State Health Plan to a provider that were greater than 30 days. Eleven representatives were contacted regarding 19 HS&R report requests. Myers and Stauffer did not identify any HS&R reports released by Peach State Health Plan that were greater than 20 days. The request and release dates reported by the CMO were confirmed for 16 requests. We were unable to confirm three report requests as two providers were deemed unreachable after contact was initiated three times.

WellCare

For Quarter 2, Myers and Stauffer did not identify any HS&R reports released by WellCare to a provider that were greater than 30 days. Ten representatives were contacted regarding 19 HS&R report requests. Myers and Stauffer identified 19 HS&R reports released by WellCare to providers that were greater than 20 days. The request and release dates reported by the CMO were confirmed for 16 requests. We were unable to confirm three report requests as two providers were deemed unreachable after contact was initiated three times.



Summary of Potential Penalties

Based on the findings for Amerigroup there are potential penalties for late reporting that DCH may elect to assess for the quarter beginning April 1, 2020 ending June 30, 2020.

For the eight instances of late reporting, 96 days were determined to be late. Georgia statute (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 \$96,000 on Amerigroup.



Recommendations

We make the following recommendations to the DCH and CMOs based on our findings after analyzing the Quarter 2, 2020 HS&R reports:

- The Department may wish to assess a penalty of \$96,000 against Amerigroup for the HS&R reports which were not released within 30 days.
- Amerigroup should review their processes and procedures to ensure all HS&R report requests are captured, logged, and submitted to the requesting provider within the required 30 day time period.



Exhibits A - B

MYERS AND STAUFFER

EXHIBIT A

Below is a summary of the issues identified during our review of the Hospital Statistical and Reimbursement (HS&R) Report Timeliness Validation. This summary includes the CMO responses to the report findings.

Please note Myers and Stauffer corresponded with Amerigroup in an attempt to resolve any issues identified prior to the issuance of this report.

AMERIGROUP

1) Myers and Stauffer identified eight HS&R reports released by Amerigroup greater than 30 days. We contacted Leticia Mayfield, Compliance Director, in order to validate the HS&R report release dates. She confirmed the report release dates and responded on November 4, 2020 with the following:

"We have reviewed the attached spreadsheet and are in agreement with your findings. We have also reviewed our processes and identified areas for improvement. As a result, we created a mitigation plan to prevent future delays. It includes, but not limited to the following:

Additional staff resources has been identified to monitor, process and generate HS&R report requests

- Associate HS&R request training + re-training has occurred (to include additional staff)
- IT support is being leveraged to expedite HS&R data pulls
- A HS&R Provider Education Blast Fax will be distributed to the provider network to ensure they are following the appropriate process
- Increased leadership oversight will occur to monitor HS&R request turnaround time and tracking

We anticipate that these steps will prevent request delays going forward."

After review of Amerigroup's response, we determined the reports were released to the providers late. Please refer to Table III for a detailed listing of late reports with potential penalties.

EXHIBIT A

Table III. Total Number of Late Reports with Potential Penalties

	Amerigroup								
No.	Provider Name	Date Report Requested	Date Report Released	Days Late	Potential Penalty				
1	Warm Springs Medical	6/2/2020	7/22/2020	20	\$ 20,000.00				
2	SE GA Health System – Brunswick	6/8/2020	7/22/2020	14	\$ 14,000.00				
3	SE GA Health System – Camden	6/8/2020	7/22/2020	14	\$ 14,000.00				
4	Grady Memorial Hospital	4/14/2020	5/23/2020	9	\$ 9,000.00				
	Children's Healthcare of Atlanta at Hughes								
5	Spalding	4/14/2020	5/23/2020	9	\$ 9,000.00				
6	Restoration Healthcare of Commerce	6/15/2020	7/22/2020	7	\$ 7,000.00				
7	Memorial Hospital and Manor	6/8/2020	7/22/2020	14	\$ 14,000.00				
8	Upson Regional Medical Center	4/14/2020	5/23/2020	9	\$ 9,000.00				

Total \$ 96,000.00

CMO Name: Amerigroup Reporting Date: 7/28/20 Reporting Period: 4/1/20-6/30/20

Hospital Name:	Location	Date Report Requested	Date Report Released	Requester's Name
WARM SPRINGS MEDICAL CTR	5995 SPRING ST	6/2/2020	7/22/2020	SHANNON DUKES
SE GA HEALTH SYSTEM - BRUNSWICK	2415 PARKWOOD DR BRUNSWICK GA 315204722	6/8/2020		Michelle Morris
SE GA HEALTH SYSTEM - CAMDEN	2000 DAN PROCTOR DR ST MARYS GA 315583810	6/8/2020	7/22/2020	MICHELLE MORRISO
MEMORIAL HOSPITAL & MANOR		6/8/2020	7/22/2020	Kay Livingston
GRADY MEMORIAL HOSPITAL	80 JESSE HILL JR DR SE ATLANTA GA 303033031	4/14/2020	5/23/2020	Felicia Sims
CHILDREN'S HEALTHCARE OF ATLANTA AT HUGHES SPALDING	35 JESSE HILL JR DR SE	4/14/2020	5/23/2020	Felicia Sims
Upson Regional Medical Center	801 W GORDON ST THOMASTON GA 302863426	4/14/2020	5/23/2020	Debra Young, Shae Foy
Restoration Healthcare of Commerce	70 MEDICAL CENTER DR COMMERCE GA 305291078	6/15/2020	7/22/2020	Lisa Gorge
John D. Archbold Memorial Hospital	915 GORDON AVE THOMASVILLE GA 317926614	6/23/2020	7/22/2020	P BARRETT
Brooks County Hospital	901 N COURT ST QUITMAN GA 316431315	6/23/2020	7/22/2020	PATRICIA BARRETT
MITCHELL COUNTY HOSPITAL	90E STEPHENS ST CAMILLA GA 317301836	6/23/2020	7/22/2020	PATRICIA BARNETT
Grady General Hospital	1155 5TH ST SE CAIRO GA 398283142	6/23/2020	7/22/2020	PATRICIA BARNETT
UNIVERSITY HOSPITAL	1350 WALTON WAY AUGUSTA GA 309012612	4/24/2020	5/23/2020	SHERI POOLE
University McDuffie County Regional Medical Center	2460 WASHINTGON ROAD N.E. THOMSON GA 308242199	4/24/2020	5/23/2020	Sheri Poole
Wills Memorial Hospital	120 GORDON ST WASHINGTON GA 306731602	6/26/2020	7/23/2020	Mandy Rose
Taylor Regional Hospital	222 PERRY HWY HAWKINSVILLE GA 310366748	6/25/2020	7/22/2020	Shae S. Foy
Tanner Medical Center - Carrollton	705 DIXIE ST CARROLLTON GA 301173818	4/29/2020	5/23/2020	Courtney Turner
TAYLOR REGIONAL HOSPITAL	222 PERRY HWY HAWKINSVILLE GA 310366748	5/6/2020	5/23/2020	Tiffany Jolly
Medical Center of Central Georgia	777 HEMLOCK ST MACON GA 312012102	5/13/2020	5/23/2020	Holly Bizic
Peach Regional Medical Center	1960 HIGHWAY 247 CONNECTOR BYRON GA 310085663	5/13/2020	5/23/2020	Holly Bizic
NAVICENT HEALTH OCONEE	821 N COBB ST MILLEDGEVILLE GA 310612343	5/13/2020	5/23/2020	Holly Bizic
Flint River Hospital	509 SUMTER STREET MONTEZUMA GA 310632502	5/21/2020	5/23/2020	Lynn Mitchell
CHOA @ Egleston	1405 CLIFTON RD NE ATLANTA GA 303221062	5/21/2020	5/23/2020	SARAH AKOTIA
CHOA @ Scottish Rite	1001 JOHNSON FERRY RD NE ATLANTA GA 303421605	5/21/2020	5/23/2020	Sarah Akotia
CHOA @ HUGHES SPALDING	35 JESSE HILL JR DR SE ATLANTA GA 303033032	5/21/2020	5/23/2020	SARAH AKOTIA

CMO Name: CareSource Reporting Date: 07/01/2020

Reporting Period: 04/01/2020 - 06/30/2020

Hospital Name:	Location	Date Report Requested	Date Report	Requester's Name
		Requesteu	Released	
Grady Health System	Atlanta	4/14/2020		Felicia Sims, fasims@GMH.EDU
Hughes Spalding Children's Hospital	Atlanta	4/14/2020	4/17/2020	Felicia Sims, fasims@GMH.EDU
Upson Regional Medical Center	Thomaston	4/14/2020	4/17/2020	Young, Debra, debra.young@urmc.org
Meriwether Healthcare, LLC	Warm Springs	4/30/2020	5/6/2020	Shannon Dukes, shannon.dukes@warmspringsmc.or
Taylor Regional Hospital	Hawkinsville	5/6/2020	5/11/2020	Tiffany Jolly, Tiffany.Jolly@taylorregional.org
Medical Center of Central Georgia	Macon	5/13/2020	5/18/2020	Holly A. Bizic, hbizic@pyapc.com
Peach Regional Medical Center	Byron	5/13/2020	5/18/2020	Holly A. Bizic, hbizic@pyapc.com
Navicent Health Baldwin	Milledgeville	5/13/2020	5/18/2020	Holly A. Bizic, hbizic@pyapc.com
Memorial Hospital and Manor	Bainbridge	5/20/2020	5/20/2020	Kay Livingston, KayL@mh-m.org
Flint River Community Hospital	Montezuma	5/21/2020	5/26/2020	Lynn Mitchell, L.Mitchell@flintriverhospital.com
SGHS Brunswick	Brunswick	6/8/2020	6/16/2020	Michelle Morris, mmorris@sghs.org
SGHS Camden	St. Marys	6/8/2020	6/16/2020	Michelle Morris, mmorris@sghs.org
Northridge Medical Center	Commerce	6/15/2020	6/16/2020	Lisa Gorge, LGorge@sas-ga.org
John D. Archbold Memorial Hospital	Thomasville	6/23/2020	6/25/2020	Patricia Barrett, pbarret@archbold.org
Brooks County Hospital	Quitman	6/23/2020	6/25/2020	Patricia Barrett, pbarret@archbold.org
Grady General Hospital	Cairo	6/23/2020	6/25/2020	Patricia Barrett, pbarret@archbold.org
Mitchell County Hospital	Camilla	6/23/2020	6/25/2020	Patricia Barrett, pbarret@archbold.org
Wills Memorial Hospital	Washington	6/26/2020	6/26/2020	Mandy Rose, mrose@willsmemorialhospital.com

^{*}No paid claims for the service and payment dates requested.

CMO Name: Peach State Health Plan

Reporting Date: 7/30/2020

Reporting Period: April 1-June 30, 2020

Hospital Name:	Location	Date Report Requested	Date Report Released	Requester's Name
Grady Health System	Georgia	4/14/2020	4/14/2020	Felicia Sims
Hugh Spalding Children's Hospital	Georgia	4/14/2020	4/14/2020	Felicia Sims
Tanner Medical Center	Georgia	4/29/2020	4/29/2020	Courtney
Warm Springs Medical Center	Georgia	4/30/2020	4/30/2020	Shannon
Medical Center of Central Georgia	Georgia	5/14/2020	5/14/2020	Holly Bizic
Peach Regional Medical Center	Georgia	5/14/2020	5/14/2020	Holly Bizic
Navicent Health	Georgia	5/14/2020	5/14/2020	Holly Bizic
Memorial Hospital	Georgia	5/20/2020	5/20/2020	Kay Livingston
Flint River	Georgia	5/21/2020	5/22/2020	Lynn Mitchell
Upson Regional	Georgia	5/22/2020	5/22/2020	Shae Foy
Taylor Regional	Georgia	5/22/2020	5/22/2020	Shae Foy
Southeast GA-Brunswick	Georgia	6/9/2020	6/9/2020	Michelle
Southeast GA-Camden	Georgia	6/9/2020	6/9/2020	Michelle
Northridge Medical Center	Georgia	6/15/2020	6/15/2020	Lisa George
John Archbold Memorial	Georgia	6/23/2020	6/23/2020	Patricia Barrett
Brooks County Hospital	Georgia	6/23/2020	6/23/2020	Patricia Barrett
Grady General Hospital	Georgia	6/23/2020	6/23/2020	Patricia Barrett
Mitchell County Hospital	Georgia	6/23/2020	6/23/2020	Patricia Barrett
Wills Memorial	Georgia	6/26/2020	6/26/2020	Mandy Rose

CMO Name: WellCare Health Plans, Inc.

Reporting Date: 07/30/2020 Reporting Period: 04/01/2020 - 06/30/2020

Hospital Name	Location	Date Report Requested	Date Report Released	Requester's Name
Huges Spalding Children's Hospital	35 Jesse Hill Jr Dr Se, Atlanta, Ga 30303	4/14/2020	5/11/2020	Felicia Sims
Grady Memorial Hospital	80 Jesse Hill Jr Dr Se, Atlanta, Ga 30303	4/14/2020	5/12/2020	Felicia Sims
Upson Regional Medical Center	801 West Gordon Street Thomaston, Georgia 30286	4/15/2020	5/13/2020	Shae S. Foy
University Hospital	1350 Walton Way, Augusta Ga 30901	4/24/2020	5/22/2020	Sheri Poole
University Mcduffie County Regional Medical Center	2460 Washington Rd, Thomson, Ga 30824	4/24/2020		Sheri Poole
Tanner Medical Center - Carrollton	705 Dixie St, Carrollton, Ga 30117	4/29/2020	5/28/2020	Courtney Turner
Warm Springs Medical Center	5995 Spring St, Warm Springs, Ga 31830	4/30/2020	5/29/2020	Shannon Dukes
Taylor Regional Hospital	222 Perry Hwy, Hawkinsville, Ga 31036	5/6/2020		Sha S. Foy
Medical Center of Central Georgia	777 Hemlock St, Macon, Ga 31201	5/13/2020	6/8/2020	Holly A. Bizic
Peach Regional Medical Center	1960 Ga-247Conn, Byron, Ga 31008	5/13/2020	6/8/2020	Holly A. Bizic
Navicent Health Baldwin	821 N Cobb St, Milledgeville, Ga 31061	5/13/2020		Holly A. Bizic
Flint River Community Hospital	509 Sumter St, Montezuma, Ga 31063	5/20/2020		Lynn Mitchell
Southeast Georgia Health System - Brunswick Campus	2415 Parkwood Drive Brunswick, Ga 31520	6/8/2020	7/7/2020	Michelle P. Morris
Southeast Georgia Health System - Camden Campus	2000 Dan Proctor Dr, St. Marys, Ga 31558	6/8/2020		Michelle P. Morris
Northridge Medical Center	70 Medical Center Dr, Commerce, Ga 30529	6/15/2020	7/13/2020	Lisa Gorge
John D. Archbold Memorial Hospital	915 Gordon Ave, Thomasville, Ga 31792	6/23/2020	7/22/2020	Patricia L. Barrett
Brooks County Hospital	903 N Court St, Quitman, Ga, 316431315	6/23/2020	7/22/2020	Patricia L. Barrett
Grady General Hospital	1155 5Th St Se Cairo, Ga 398283142	6/23/2020	7/22/2020	Patricia L. Barrett
Mitchell County Hospital	90 E Stephens St, Camilla, Ga, 317301899	6/23/2020	7/22/2020	Patricia L. Barrett