

Provider Compliance Forum



**BHO COMPLIANCE
OFFICER**

MAY 3, 2013

Forum Purpose



- **An opportunity to learn more about the BHOs' compliance concerns and audit plans**
- **An open forum for providers to ask questions about compliance related topics**
- **Presented to members of providers' Compliance, Quality Improvement, and Billing or Accounts Receivable staff**

Agenda



- **Overview of BHO CCO Committee**
 - What/Who
 - Why was it formed
 - Committee Charge
 - Initial Initiatives
- **Compliance Landscape**
- **BHO Compliance Concerns**
- **Q&A**

What is the BHO Compliance Officer Committee?



- Colorado Behavioral Health Council (CBHC) is the industry group for behavioral health
- CCO Committee is a subcommittee of the CBHC BHO Executive Director (ED) Committee
- Formed to carry out the compliance initiatives of the former Colorado Council on Quality & Compliance (CCQC)

Who is the BHO CCO Committee?



- **CCO Committee members include compliance officers for the 5 Colorado behavioral health organizations (BHOs)**
 - **Access Behavioral Care (ABC/Colorado Access)**
 - **Behavioral Health, Inc. (BHI)**
 - **Colorado Health Partnerships (CHP)**
 - **Foothills Behavioral Health Partners (FBHP)**
 - **Northeast Behavioral Health Partnership (NBHP)**

Why Was the BHO CCO Committee Formed?



- **Increased compliance requirements**
- **State expects BHOs to verify claims**
 - HCPF audits the BHO audit results
- **Increasing state and federal oversight**
 - HHS and DOJ: anti-fraud recoveries for 2012 (\$4.2 billion)
 - CMS: \$3.16 billion in separate non-fraud overpayment over past three years
 - \$1 spent = \$7.9 recovered

BHO CCO Committee Charge



- **CCQC recommendations for BHO monitoring:**
 - Activities for potential fraud, waste, and abuse, particularly Medicaid
 - Provider documentation and the validity of claims/encounters submitted to and used by HCPF for rate setting
- **Charge is to help the BHOs assess risk and collaborate on common issues**

Initial Initiatives



- **Provider Compliance Plan Self Assessment**
- **Claims and Encounter Review (50 claim audit)**
- **Program Review**
 - Clubhouse and Drop In Services
 - Residential Services
- **Online Compliance Program Surveys**

Individual Initiatives



- **Provider Compliance Plan Self Assessment**
 - January 2012
 - High volume providers (over \$50,000 in claims/encounters)
 - Compliance Plan Self Assessment tool
 - Used to identify areas where providers may need assistance
 - Encouraging results

Individual Initiatives (contd)



- **Claims and Encounter Review (50 claim audit)**
 - 50 claim audit of HVPs in May 2012
 - Focused on documentation
 - A summary of the responses was provided to the EDs
 - Results identified areas for training

Individual Initiatives (contd)



- **Program Reviews / Data Gathering Surveys**
 - Clubhouse and Drop In Services
 - Residential Services
 - Results used by CBHC Coding Manual Committee to recommend changes to the Coding Manual

Current Compliance Landscape



- **Standards are more stringent and stakes are higher as Medicaid expands**
- **Government expects high-quality, medically necessary care that is reimbursed appropriately**

Compliance Concerns



- **Common themes though each BHO assesses its own risk**
- **Documentation is critical**
 - Thorough narrative/progress note
 - Accurate coding
 - Treatment Plans
 - Credentials, POS, duration, etc.
 - Elements in the USCSM
- **Demonstrates medical necessity and supports continuity of care**
- **Documentation needs to support the services billed**

Compliance Concerns - continued



- **Exclusions**
 - Check your staff against the LEIE and SAM
 - www.exclusions.oig.hhs.gov and www.sam.gov
- **Credentials**
 - Licensure, background checks
- **HIPAA**

2013 Committee Initiatives



- **Plan Self-Assessments – Low volume providers**
- **50 Claim Audits**
- **Develop tool and audit new psychiatric/E&M codes**
- **411 audit risk analysis**
- **Continued provider training and auditing**

Compliance Support



- **Documentation resources**

- Medicaid Coding Manual

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

- BHO Provider Manuals

- ValueOptions <http://www.valueoptions.com/providers/Protools.htm>

- **Compliance Programs**

- CMS www.cms.gov

- OIG <http://oig.hhs.gov/compliance/provider-compliance-training/index.asp>

- NY Office of Medicaid Inspector General

<http://www.omig.ny.gov/data/content/blogsection/8/52/>

- HCCA hcca-info.org

- SCCE <http://community.corporatecompliance.org/Home/>

- **How can we help you?**

For More Information



BHO	Compliance Officer
Access Behavioral Care (ABC/Colorado Access)	Brenda Mientka at 720.744.5466
Behavioral Health, Inc. (BHI)	Beth Tarasenko at 720.490.4454
Colorado Health Partnerships (CHP)	Erica Arnold-Miller at 719.538.1450
Foothills Behavioral Health Partners (FBHP)	Elizabeth Strammiello at 303.432.5950
Northeast Behavioral Health Partnership (NBHP)	LaRue Leffingwell at 970.347.2374

Questions



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