

# Risk Adjustment Integrity:

Best practice approaches for balancing business needs with regulatory and compliance standards

Presented By:

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We are a network of health care professionals addressing the challenges posed by the emerging landscape of value-based care and government health care reform.

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Our mission is to provide a community for like-minded professionals to come together for networking, education, and industry collaboration to stay ahead and advance their careers.

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ASK YOUR QUESTIONS IN OUR DISCUSSION BOARD

# IN THIS PRESENTATION YOU'LL LEARN TO:

- Assess current capabilities
- Identify gaps in coding accuracy
- Develop programs to enhance coding accuracy
- Mitigation activities to combat errors
- Plan for long-term improvements





# Planning for Coding Accuracy Improvements

# EVALUATE THE BASELINE & IDENTIFY GAPS

Identify Current Risk Mitigation Activities

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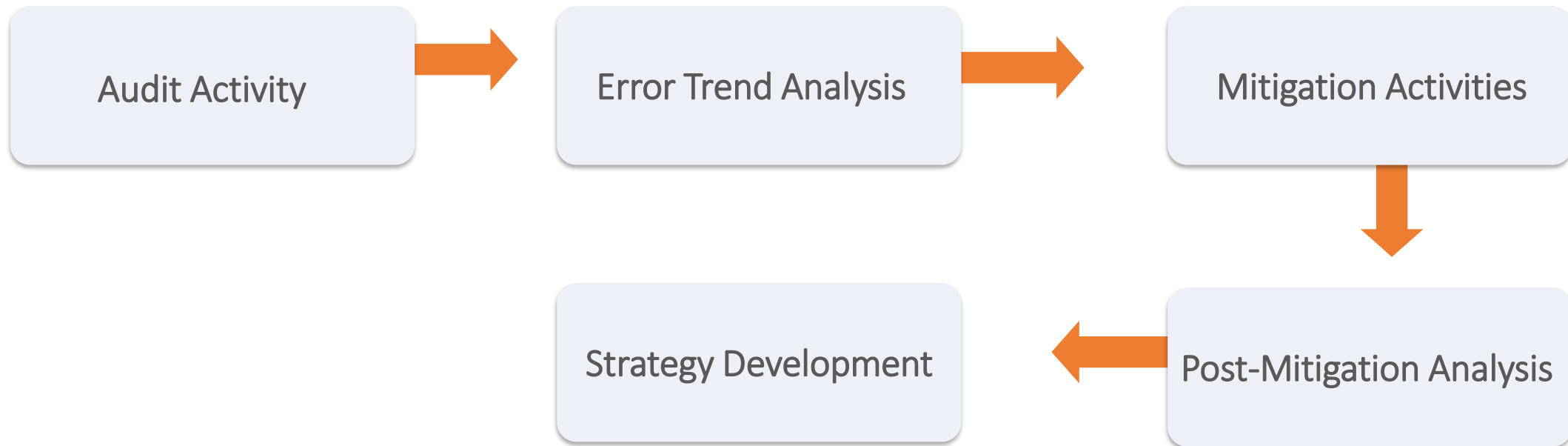
## DO YOU SELF AUDIT?

- Risk mitigation audits: targeted & annual HCCs
- Supplemental Initiatives
- 3rd party vendors
- Organic claims activity

## NEXT STEPS: AUDIT FINDINGS

- Government audit findings
- Risk mitigation audit findings
- Supplemental program findings

# EVALUATE THE BASELINE & IDENTIFY GAPS





# Key Elements for Improving Coding Accuracy



# PROSPECTIVE PROGRAMS

## Managing Internal & Vendor Coding Reviews

- Heavily geared towards provider engagement and education
- Contracting strategies that incentivize providers to have skin in the game
- Supplemental activities with a 95% accuracy rate (claims to medical record)
- Audit In Home Assessments (IHAs) to ensure the diagnoses captured are consistent and supported via the physician medical record

# RETROSPECTIVE PROGRAMS

## Managing Internal & Vendor Coding Reviews

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- Intensive coder training to achieve 95% accuracy rate prior to coder supplemental activity
  - ▶ Health plan driven – meets health plan Quality Assurance requirements
- Two sets of eyes on all supplemental coding work
- Front end measures become retro coding activities for coding optimization
- Feedback loop on risk mitigation and government audit findings
  - ▶ Provider performance reporting
  - ▶ Unified approach to provider education & training process and materials

# Submissions

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- EDPS/RAPs Submission management & oversight for compliant, complete and timely processing to CMS
- Error resolution management of CMS return files
- RAPS & EDPS reconciliation processes
- Continuous end-to-end data tracking to assure compliant & complete capture of claims for EDPS & RAPs submissions
- Reporting capabilities for submission activities, trends, and performance improvement



# Improvements via Provider Engagement

- Dashboard reporting for tracking compliance performance
- Aligned strategies and programs that centralize audit findings and performance trends
- Multi-year strategy for provider performance improvement
  - ▶ Team sport contracting, legal, regulatory, P & L owners, and risk adjustment teams





# Mitigation Activities

# MITIGATING RISK OF INACCURATE SUBMISSIONS

- Utilize analytics to identify common inaccurately submitted high-risk diagnosis codes
- Perform statistically sound and random audits of HCC categories to identify high-risk error codes
- Conduct additional targeted audits focusing on HCCs identified as having higher error rates



# MITIGATING RISK OF INACCURATE SUBMISSIONS

- Identify providers through auditing who are frequently submitting diagnoses incorrectly
- Complete timely and targeted provider education, focusing on errors identified
- Re-audit providers post-education to ensure compliance with education given
- Stop-gap measure implementation if needed





## CLINICAL DOCUMENTATION, AUDIT SAMPLES, CODING AND MORE

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# Developing Your Multi-Year Strategy

# CONSIDER INDUSTRY TRENDS & PLAN 2-3 YEARS OUT

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- Regulatory Environment (Current & Future)
- How Payers Respond Nationally & Locally
- Determine Your Risk Tolerance
- Plan for Investments
- Incorporate Audit Liabilities Into Your Forecast

# DESIGN & EXECUTION

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- Determine the key areas for improvement
- Identify more than one roadmap that adjusts for factors:
  - ▶ Resources needed to complete
  - ▶ Total cost associated with the resources
  - ▶ Time to implementation
  - ▶ Reporting capabilities
  - ▶ Dependencies & impacts



# DESIGN & EXECUTION

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- Account for governance structure and corporate stakeholders
- Project manage the plan
- Develop and execute the communications plan to all stakeholders
- Execute and evaluate quarterly and annually
- Adjust strategy each year based on results

# KEY TAKEAWAYS

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- Compliance is an essential business roadmap item
- A high performing business makes continual investments in this area
- Multi-year strategies assure execution
- It's a Team Sport!

Advantasure offers an end-to-end suite of technology-enabled solutions for government-sponsored health plans.

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