



HCA Managed Care Program Oversight

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Gail Kreiger, BSN
Section Manager

Medicaid Compliance Review and Analytics

Washington State
Health Care Authority

Program Integrity

CMS Review

How we are accountable to CMS

▶ HCA created corrective action plan in response to CMS review

| Finding | Response |
|--|---|
| Organize program integrity into one unit or common protocol | Fraud investigation moved into program integrity division; ongoing provider enrollment collaboration (September 2018) |
| Ensure sufficient resources for prevention, detection, investigation, referral of suspected provider fraud | New dedicated managed care plan program integrity oversight unit (December 2018) |
| Improve program integrity contract language with managed care plans | Contract language strengthened to be specific to Code of Federal Regulation (effective July 2019, January 2020) |
| Conduct audits of encounter data to ensure rate setting integrity | Oversight plan roll-out March 2019 for HCA agency approval; audits/increased oversight in collaboration with Milliman |

Quality Oversight

How we ensure plan accountability for quality

- ▶ All HCA Medicaid managed care plans must be:
 - ▶ Accredited by National Committee for Quality Assurance (NCQA)
 - Accreditation contingent on HEDIS* measure (46) performance that evaluates quality, access, and timeliness of care
 - ▶ Independently reviewed annually by contracted External Quality Review Organization – Qualis Health (per Code of Federal Regulations)
 - ▶ Evaluated annually by TEAMonitor, which includes HCA clinical and program staff
 - Includes review of managed care plan compliance with federal laws and contract requirements
 - CMS acknowledges is one of best approaches in nation for monitoring managed care plan performance

*The Healthcare Effectiveness Data and Information Set (HEDIS) is a widely-used performance management tool.

Knowing the level of Medicaid managed care plan performance

- ▶ External Quality Review Organization provides 3 annual analysis reports
 - ▶ Comparative analysis report
 - ▶ Regional analysis report
 - ▶ Technical analysis report
- ▶ Released after end of each calendar year
- ▶ Analysis of each managed care plan's performance in previous calendar year

Comparative analysis report

- ▶ Analysis of managed care plan performance on HEDIS* measures
- ▶ Provides performance data for each plan – across Medicaid managed care plans, across time
- ▶ Offers benchmark against other states' Medicaid managed care performance, compared to national Medicaid 50th percentile level
- ▶ Provides insight into performance based on care recipients' demographics

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Regional analysis report

- ▶ In-depth analysis at regional level
- ▶ Provides insight into performance variation and trends in specific geographic areas and for demographic groups within a region
- ▶ Identifies opportunities to implement strategies that may have an impact on quality of care and life for people in that region and in sub-regions

Technical analysis report

- ▶ Summary report of managed care plan and behavioral health organization performance
 - ▶ Role-up of information from comparative analysis report, regional analysis report, and TEAMonitor reports produced by HCA staff
- ▶ Required by Code of Federal Regulations
- ▶ Explains if managed care plans are meeting federal and state regulations, contract requirements, and statewide goals
- ▶ Provides specific recommendations aimed at improving the Medicaid managed care delivery system of care

Tools for accountability and performance

▶ Performance Improvements Projects (PIP)

- ▶ Code of Federal Regulations-required to improve clinical and non-clinical managed care plan performance
- ▶ May be plan-specific or collaborative with all plans

▶ Incentive programs

- ▶ HCA withholding 1.5% of the per member, per month (PMPM) costs; plan has to earn the withhold by achieving quality improvement
 - ▶ Improvement shown by reaching performance targets on specific HEDIS measures
- ▶ Plans motivating providers to engage in shared responsibility for meeting targets with financial rewards for delivering quality care
- ▶ Plans motivating care recipients through gift cards, reminder calls, and postcards

Tools for accountability and performance

▶ Targeted strategies

- ▶ Data-driven, focused efforts to identify subpopulations not receiving recommended health care (so performance measure not achieved)
 - Example: Adolescents not getting well-child checks; visits improved when families responded to incentives, such as adolescents' families getting gift cards
- ▶ Antidepressant Medication Management- Effective Acute Phase and Continuation Phase Treatment
 - Spanish-speaking individuals who are prescribed antidepressants affected by poor Rx adherence
 - Improvement strategies focus on education about treatment and cultural awareness

Quality Impact

Quality measure variation

- ▶ Preventive care

- ▶ Ex: Women's health screening in **20-39th percentile**

- ▶ Chronic care management

- ▶ Ex. Diabetes monitoring in **40-79th percentile** (majority around 79th)

- ▶ Appropriateness of care

- ▶ Ex: Respiratory conditions and low back pain in **60th or above percentile**

Results show quality measure improvement

- ▶ All plans (5 of 5) earned back 100% of their withhold in fall 2018
 - ▶ Demonstrates that plans are working to improve contract quality measure performance (as part of value-based strategy)
- ▶ All 5 plans also showed improvement in several quality measures, among them are:
 - ▶ Controlling high blood pressure (<140/90)
 - ▶ Antidepressant medication management (effective acute phase treatment)



Questions?

Gail Kreiger

Section Manager

Medicaid Compliance Review and
Analytics

(360) 725-1681

gail.kreiger@hca.wa.gov