

#### Pre-Payment Review





# **DCH Policy**





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#### Definition:

- 62) Prepayment Review means review of medical documentation prior to payment of a claim.

#### Section 401.1 Pre Payment Review

- A) Prepayment review (PPR) is the review of a provider's medical documentation prior to payment of a claim. The Department and/or the Care Management Organizations (CMO) makes the decision to place agencies on prepayment review because of, but not limited to:
  - Violation of Medicaid policy or Conditions of Participation;
  - Inappropriate or aberrant billing practices;
  - Credible allegations of fraud; or
  - Behavioral Health providers with an audit score below 70% per Part II, Policies and Procedures for Community Behavioral Health Rehabilitation Services, Appendix E, Audit Protocol (Fee-for-service only).
- The Office of Inspector General Program Integrity Unit (OIG-PI) and/or Care Management Organizations (CMO) will evaluate decisions for PPR on a case by case basis. OIG-PI and/or CMOs will exercise discretion when determining if specific CPT codes, or all CPT codes will be placed on PPR. OIG-PI and/or the CMO will place providers on PPR for the same CPT codes across the enterprise to ensure consistency of the review.
- The Office of Inspector General Program Integrity Unit (OIG-PI) and/or Care Management Organizations (CMO) will evaluate decisions for PPR on a case by case basis. OIG-PI and/or CMOs will exercise discretion when determining if specific CPT codes, or all CPT codes will be placed on PPR. OIG-PI and/or the CMO will place providers on PPR for the same CPT codes across the enterprise to ensure consistency of the review.



- B) OIG-PI or CMOs or its representative reviews the provider's documentation to determine whether the claim is appropriate for Medicaid payment based on criteria including, but not limited to, provider documentation which establishes that:
  - 1. Services were provided according to OIG-PI and/or CMO policy requirements;
  - 2. Billed services were medically necessary, appropriate, and not in excess of the member's need;
  - 3. Members were Medicaid-eligible on the date the services were provided;
  - 4. Prior authorization was obtained if required by policy;
  - 5. Providers and their staff were qualified as required by Medicaid policy: and
  - 6. Providers possessed an active Medicaid provider number, licenses, and certifications at the time the services were provided to the Medicaid member(s)
- C) Providers may not appeal the OIG-PI or CMO decision to place the provider on Prepayment review. Prepayment review and the removal of a provider from Electronic Data Interchange (EDI) are not considered adverse actions. Providers may appeal the denial of any claim, reduction of reimbursement or the withholding of reimbursement, which occurred during the PPR process.



- D) OIG-PI will notify the CMO when a provider is placed on PPR by providing a written notification. The CMO should conduct a billing risk assessment to determine if they should take similar action. The CMO should notify the OIG-PI of the outcome of the risk assessment within 30 days.
- The CMOs will provide a monthly report of all claims reviewed for providers on PPR to the OIG-PI. OIG-PI will review CMO monthly report and conduct a billing risk assessment, within 30 days, to determine if OIG-PI and other CMO payers should take similar action for claims billed to the Fee for Service (FFS) program and/or other CMOs for the same CPT codes. OIG-PI will also notify other CMOs by sending written notification if it is determined that OIG-PI or another CMO has placed a provider on PPR.
- OIG-PI and/or CMOs will provide a monthly report to the provider regarding the outcome of the reviewed claims.



- E) Removal from Prepayment Review;
- Providers must bill timely and accurate claims during the prepayment review period. Providers who demonstrate a continued pattern of not billing timely and accurately during the prepayment review period may be terminated from the Medicaid/PeachCare for Kids® program pursuant to § 404 (D). A provider may appeal their termination from Fee-for-service by requesting a hearing from the Commissioner of the Department of Community Health within ten (10) days of the date of the initial decision issued by the Department regarding termination in Medicaid/PeachCare for Kids programs. The request for hearing must include:
  - A copy of the Notice of Termination from Medicaid/PeachCare for Kids;
  - A clear expression by the provider or authorized representative that he/she wishes to present his/her case to an Administrative Law Judge or designated Hearing Officer;
  - Identification of the action being appealed and all issues that will be addressed at the hearing;
  - A specific statement of why the provider believes the Department's decision is wrong; and
  - A statement of the relief sought.



- If appealing the termination action from a CMO, the provider should refer to the CMO's policy for requesting an appeal.
- Providers must bill the greater of 10% of normal billing volume or a minimum of 40 claims for dates of service that occurred while on PPR to be considered for removal. The aggregate of claims reviewed must meet an 85% pass rate to be considered for removal.
- Providers who have an error rate of less than 15% (based on claim line items) for a period of three months will be considered for removal after they have fulfilled the requirements for all CPT codes under review. Providers will be notified in writing of the effective end day of review.
- OIG-PI will notify the CMO when a provider is removed from PPR by providing a written notification. The CMO will notify OIG-PI when a provider is removed from PPR by providing a written notification.



- F) Post Payment Review:
- Providers who have been released from Prepayment Review will be subject to a
  post-review of claims billed, six (6) to 12 months from release. Providers will be notified
  by OIG-PI and/or CMO or its representative of the claims being reviewed, the
  documentation needed for the post review, and due date of the requested
  documents.
- If the provider does not comply with the request for documentation within the given timeframe, the provider will be placed back on PPR until OIG-Pl and/or the CMO determines it is no longer necessary.
- If the Post Payment Review determines the provider has an error rate of more than 15%, the provider may be placed back on PPR or be considered for termination from the Medicaid/PeachCare for Kids<sup>®</sup> program pursuant to § 404 (D). A provider may appeal their termination by following the provisions outlined in Chapter 500 of this manual.



- Section 401.1 (cont.)
  - G) Termination of Medicaid ID of providers on PPR
  - OIG-PI and/or the CMO may terminate the provider agreement because of, but not limited to:
    - Provider/Provider group has been on PPR for 16 months and there has been no billing activity during this time;
    - Documentation consistently fails to support services billed or medical records were not provided to support claims billed to Medicaid;
    - Provider/Provider group currently on PPR may be terminated when entering a guilty plea or when a jury returns a guilty verdict in a federal or state prosecution involving healthcare fraud.



#### 502.1 DMA-520A Provider Inquiries for Clinical Reviews for Medical Necessity

For inquiries regarding medical/clinical reviews for medical necessity, providers must submit the inquiry electronically via the web portal (www.mmis.georgia.gov) secure home page link: Prior Authorization/Medical Review Portal/Provider Inquiry Form (DMA-520A). The inquiry must be submitted within thirty (30) days from the date of the denial. All inquiries regarding medical/clinical reviews must be submitted utilizing the DMA-520A. Once the electronic inquiry is submitted, an inquiry reference number will be generated. Only one DMA-520A form may be used per inquiry/ICN. All data fields must be completed by the provider. Prior Authorization reconsiderations should be submitted through the Prior Authorization Medical Review Portal.



- 502.1 DMA-520A Provider Inquiries for Clinical Reviews for Medical Necessity (cont.)
- Supporting documentation must be submitted simultaneously with the DMA-520A. Supporting documentation is to be electronically attached to the inquiry (DMA-520A). Effective July 22, 2016, ad as part of the GA Medicaid Paperless Initiative which went into effect May 1, 2015, faxes for DMA-520A Provider Inquiry/Appeals requests are not accepted. All supporting documentation must be electronically submitted through the GAMMIS Web Portal (www.mmis.georgia.gov) via the Medical Review Portal link located under the Provider Information tab.
- Mailed hard copy DMA-520A provider inquiry forms will not be accepted and will be discarded. All inquiries must be submitted via the web portal (www.mmis.georgia.gov) secure home page link: Prior Authorization/Medical Review Portal/Provider Inquiry Form (DMA-520A).





- 502.1 DMA-520A Provider Inquiries for Clinical Reviews for Medical Necessity (cont.)
- Upon completion of the medical review by the Medical Management Contractor, the decision will be available for viewing on the web portal. E-mail notifications will be sent informing providers whenever a decision is available for viewing within the Medical Review Portal on the same day that the decision is made. Providers will also be able to view and download the electronic decision correspondence directly from the Medical Review Portal. All communications to the provider will be attached directly to the review case within their secure Provider Workspace.
- The Medical Management Contractor does not review: Medicare crossover appeal claims, timely filing, NDC, request for reprocessing of corrected claims, Health Check, duplicate claims, etc. If you have questions regarding these items, please contact Gainwell Enterprises at 1-800-766-4456.



- 502.1 DMA-520A Provider Inquiries for Clinical Reviews for Medical Necessity (cont.)
- Should you require assistance completing the DMA-520A, a user guide describing the DMA-520A web submission process is available on the web portal at www.mmis.georgia.gov: Provider Workspace/Education and Training link.



# Pre-Pay Claims Submissions and Reviews







#### **Pre-Pay Claims Submissions**

- Six months from the DOS to submit a claim.
- Supporting documentation is to be attached to the claim.
  - OZ indicator
  - 30 days to attach the documentation in GAMMIS.
- > 90 days to submit a corrected claim from the RA date.
- PA number on the claim should cover the billed DOS.
- If a member has transitioned from CMO to FFS, attach a copy of the CMO approval letter.



#### **Pre-Pay Claims Submissions**

- ➢ File Names:
  - o Name the document the date of service and procedure code.
  - Example: if you are submitting a claim for a Behavioral Health Assessment (H0031) on July 1, 2021 (070121), you would name/label the uploaded document as follows: 070121 H0031.
- Limit to 5 lines of service.
- Do not bill date spans.
- Bill each date of service (DOS) separately.



#### **Medical Review Process**

#### 1. Suspended Claims - GAMMIS

- Claims are submitted to the Gainwell GAMMIS webportal claims system.
- Documentation is to be attached to the suspended claim for medical review.
- Use the attachment indicators: OZ, NN, B4 (hospice), etc.
- The review nurses use the DXC claims system to review the suspended claims.

#### 2. DMA-520A Inquiries/Appeals

- Appeals are submitted directly to Alliant.
- Appeal a denied claim or denied line item. Do not appeal a suspended claim. Include ICN # being appealed.
- 30 days from the RA date to submit the appeal.
- Documentation is to be attached at the time the appeal is requested.
- Banner Message, Policy Clarification of the DMA-520A Medical Claims Provider, posted on 5/18/18.

#### 3. Administrative Reviews

- Appeals are submitted directly to Alliant.
- Appeal a denied DMA-520A Inquiry/Appeal. Include denied "Q" number.
- 30 days from the DMA-520A appeal to submit the administrative request.
- Documentation is to be attached at the time the administrative review is requested.



#### **Pre-Pay Suspended Claims**

- Edit 7500 RENDERING PROVIDER IS UNDER REVIEW.
  - Claims will suspend for pre-payment review.
- Claims are reviewed in the order in which they are received.
- Detailed review decisions are entered on each claim.
  - Contact the Gainwell for the review decision or the DCH contact person.
- The DCH policy manual that is applicable to the DOS billed is utilized.
- Even if the pre-pay review edit is approved, the claims system might post another edit that causes the claim to deny.



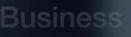


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# DMA-520A Appeals









#### **DMA-520A Appeal Reviews**

- Medical Review.
- ➤ Submitted through the GAMMIS Web Portal: Prior Authorization → Medical Review Portal → select Provider Inquiry Form (DMA-520A).
- Alliant Reviews DMA-520A forms.
- ➢ Gainwell reviews the DMA-520 form.



#### DMA-520A Appeal Reviews (cont.)

- Visit www.mmis.georgia.gov, select Prior Authorization, Medical Review Portal, Provider Inquiry form (DMA-520A).
- Used for clinical/medical reviews for medical necessity and reconsiderations for rereview.
- Prior Authorizations (PA/UM) inquiries are to be electronically submitted directly into GAMMIS to the PA/UM team via the Medical Review Portal under the PA Change and Reconsideration Requests.
- Must be requested/received within 30 days from the date of the denial or date of final Alliant denial.
- Once the electronic inquiry is submitted to Alliant, providers will receive an Inquiry Number (Q Number for tracking).
- All supporting documentation and clinical justification must be submitted simultaneously with the DMA-520A request to Alliant via Prior Authorization/Medical Review Portal logon. No paper, mail, or faxes are accepted at Alliant for medical reviews.



#### **DMA-520A Initial Provider Review**

Home | Contact Information | Member Information | Provider Information | Provider Enrollment | Nurse Aide/Medication Aide | EDI | Pharmacy | HFRD Account | Providers | Training | Claims | Eligibility | Presumptive Activations, | Health Check | Prior Authorization | Home Search Prior Authorization Submit/View

Medical Review Portal Waiver Case Manager PA Search

Reports | Trade Files

GAMMIS:Medical Review Portal <- Bookmarkable Link </p>

#### Enter and Edit Authorization Requests

Enter a New Authorization Request - Use this link to enter a new prior authorization request. More...

Search, Edit or Attach Documentation to Requests - Use this link to search, edit or attach documentation to authorization requests. More...

Member Medicaid ID Updates - Use this link to Search, Edit, and modifying Member Medicaid IDs for SwingBed or Katie Beckett requests.

#### PA Change, Reconsideration and Recertification Requests

Submit/View PA Change Requests - Use this link to request a change to existing authorization requests. More.

Submit Reconsideration Requests - Use this link to request a reconsideration to a denied case except CIS request. More...

Submit/View PA Recertification Requests - Use this link to request a change to existing authorization requests. More...

Submit/View PA Admin Review Requests - Use this link to request a Admin Review to existing authorization requests. More ...

Use this link to request a Admin Review to your existing authorization requests. Depending on the request type, there may be restrictions on whether a Admin Review can be submitted. Also, use this link to find Admin Review requests previously submitted and view the status of the Admin Review requests.

#### Provider Inquiry and Appeals Form (DMA-520A)

Provider Inquiry Form (DMA-520A) - Use this inquiry form to submit claim for services rendered and is denied.

View Edits Reviewed by AHS - Click this link to view a list of claim edits that are reviewed by Alliant Health Solutions.

#### Help & Contact Us

Education & Training Material and Links - Use this link to access workshops, webinars, user manuals, and other resources.

Contact Us or Search My Correspondence - Use this link to contact review nurse staff behind the scenes of MMIS portal.

# DMA-520A Provider Appeals Notification of Decisions

- Providers will be notified via the Alliant Web Portal when an appeal has been received in the Inquiry and Appeals system and when a decision has been rendered on the appeal.
- To ensure secure transfer of information and compliance with HIPPA regulations, provider notifications will consist of a combination of No-Reply Emails and Contact Us (Correspondence) messages.
- > Auto Reply Example:

\*\*\* DO NOT RESPOND TO THIS E-MAIL \*\*\* Dear Provider - ###, Thank you for contacting Alliant Health Solutions. Your DMA-520A/Appeal request, "\*\*\*\*\*\*3593", has been received and placed in the queue to be reviewed. Please allow us time to review your appeal. Please visit Medical Review Portal section of Georgia MMIS portal: https://www.mmis.georgia.gov to view any details. Regards, Nurse Reviewer Team. \*\*\* Please note: This e-mail was sent from a notification-only address that cannot accept incoming e-mail. Please do not reply to this message. \*\*\*



#### **DMA-520A Administrative Review**

- Effective September 1, 2017, the process for requesting an Administrative Review Request of a Medical Claims Inquiries/Appeals, DMA-520A has changed.
- All Administrative Review Requests of a Medical Claims Inquiry/Appeal, DMA-520A, are to be electronically submitted via the Georgia Medicaid Management Information System (GAMMIS) Web Portal at www.mmis.georgia.gov under the Provider Inquiry Form (DMA-520A) section. Providers will be notified via a "No- Reply" e-mail when their Administrative Requests are received and when a decision has been rendered by Alliant.
- > A new review type, Administrative, has been added to the current Provider Inquiry Form (DMA-520A).
- > Only one Administrative Review Request can be submitted at a time.
- > The Administrative Request can only be requested on a previously reviewed inquiry/appeal (DMA-520A).
- The inquiry number, "Q number," must be included with the request or the system will not accept the administrative request.
- > In the comments section, please indicate why an Administrative Request is being submitted.
- Supporting medical documentation must be attached to the request at the time of submission.
- > If documentation is not attached, then the system will auto deny your administrative request.
- This information can be found on Banner message posted 9/20/2017 (Medical Claims Administrative Review Process).



#### DMA-520A/DMA-520A Administrative Review Timelines

Medical Review DMA-520A		Time Frame
Claim Denial	Validate denial is medical related. Check edit is reviewed by Alliant	
Step 1	Submit DMA-520A Appeal - Attach supporting Medical/Clinical documentation	within 30 days of your claim denial date
Step 2	DMA-520A - Denial Letter is received	
Step 3	Submit DMA-520A Administrative Review - Attach supporting Medical/Clinical docum	within 30 days of denial letter
Step 4	DMA-520A Administrative - denial Letter is received	
Step 5	Request an Administrative Law Hearing - Must include a copy of the DMA-520A denial	Request must be submitted within 15 days
	& Administrative Denial letter, RA and all other supporting documentation.	from the DMA-520A Admintrative Revie denial
		letter





# Guidelines for Providers during Pre-Payment Review (PPR)







# General Information for Providers during Prepayment Review (PPR)

The purpose of these guidelines are to help you understand the prepayment review process and provide some information that will help ensure the efficient review of your claims.

During the PPR period, all of your claims will be billed through GAMMIS, just as you have billed in the past. The only difference is that you will need to upload the documentation to support the claims into GAMMIS.

- The staffing organizational chart should be submitted to DCH when initially placed on PPR and when updated or changed.
- > In order to be paid, you must submit claims.
- > You have six months from the date of service to submit a claim in GAMMIS.
- You must upload the documentation to support the claim into GAMMIS within 30 days of submitting the claim. If you do not upload the documentation, the claim will be automatically denied. Below is some information about uploading documentation.
- When a claim is denied, you have 90 days from the date of denial to resubmit the claim. When the claim is resubmitted, you must upload the documentation to support the resubmitted claim.



#### General Information for Providers during Prepayment Review (PPR) – Cont.

- Your claim approvals will not be immediate. If you submit the claim multiple times, it will delay the review. Claims are reviewed in the order in which they are received.
- Your Medicaid payments will be done in the same way they were done prior to your placement on PPR. If you were receiving electronic payments, you will continue to receive electronic payments. Payments are made the next payment cycle after the claim is approved. If you have an outstanding balance with the Georgia Department of Community Health, your payment may be recouped by the Benefits Recovery Section. This is not a result of PPR.
- You cannot contact Alliant directly. If you have questions or need information, please email Victoria Montes (<u>vmontes@dch.ga.gov</u>) for assistance.
- If you have any issues uploading documentation into the GAMMIS portal, please see attached document titled "How to contact Gainwell field rep."
- If you have any questions or concerns, please email Victoria Montes (vmontes@dch.ga.gov) so that she may assist you.



### Documentation Assistance for Providers during Prepayment Review (PPR)

- When naming/labeling the uploaded documents: Name the document the date of service and procedure code. For example: if you are submitting a claim for a office visit(99213) on July 1, 2021 (070121), you would name/label the uploaded document as follows: 070121 99213. Upload them in order by date.
- Limit the dates of service billed per claim to 5 or less. This will help expedite the reviews.
- Do not bill a date span. Each date of service must be billed separately. This will ensure that you receive partial payment for a claim when some of the claims are approved and others are not.



### Documentation Assistance for Providers during Prepayment Review (PPR) – Cont.

- If the member has transitioned from a CMO into FFS, please attach a copy of the CMO approval letter to the claim in addition to the rest of the supporting documentation. The CMO approval letter should include/cover the billed dates of service.
- Valid PA.
- Billed DOS need to be within the PA timeframe.
- If the dates of the supporting documents such as, OFS, Tx Plan and BH Assessment do not fall within the PA timeframe entered into GAMMIS of the Dates of Service you are billing for, you will need to print the PA that covers the supporting documents and upload as an attachment.
- Any changes/modifications/corrections of errors should be corrected according to currently accepted standards of medical practice (corrections shall evidence the error, the correction, the initials of the corrector and the date of the correction).
- When adding additional notes/documentation/comments to a document, please indicate "addendum" and be sure to initial and date the additional notes/documentation/comments.
- > Note: The assistance/suggestions above are not an all-inclusive list.



### Uploading Documents in GAMMIS for Providers during Prepayment Review (PPR)

- In order to attach a document to a request, the document must be saved to one of the provider's system drives.
- The following file types are acceptable for attachments: TXT, DOC, DOCX, PDF, TIF, TIFF, JPG, JPEG, and JPE.
- Do not include the following symbols as part of the file name: \, /, #, greater than sign, lesser than sign, ', ".
- The name of the file to be attached cannot have the same name of a file that is already attached.
- The file size for an individual attachment MUST be less than 20 MB in size; so if a file is especially large, divide the file into two files.
- Multiple documents may be attached to the claim request. However, the documentation that is attached should only relate to the member associated with the claim, and not relate to any other members.





# Review Overview Some items looked at during a review







# **Review Overview**

Below are some items looked at during a review. Please note this is <u>not</u> an all inclusive list.

- Progress/clinical notes submitted for billed date of service.
- Consultation notes.
- X-ray's billed electronic copy of radiographs attached to the claim.
- Physician orders for billed labs.
- Required waiver forms/appendixes.



# Review Overview (cont.)

- Valid PA.
- Billed DOS need to be within the PA timeframe.
- If the dates of the supporting documents such as, OFS, Tx Plan and BH Assessment do not fall within the PA timeframe entered into GAMMIS of the Dates of Service you are billing for, you will need to print the PA that covers the supporting documents and upload as an attachment.
- Legal corrections followed.
- Signatures.
- Practitioner name and credentials.



# Review Overview (cont.)

- Face-to-face versus telehealth visit.
- Notes legible.
- Entered retroactively.
- Duplication.
- Justification/medically necessity of services provided.



# Review Overview (cont.)

- Billed units, modifiers and time elements.
- NCCI/MUE.
- CPT/HCPCS/CDT codes billed.

#### Making Health Care Better