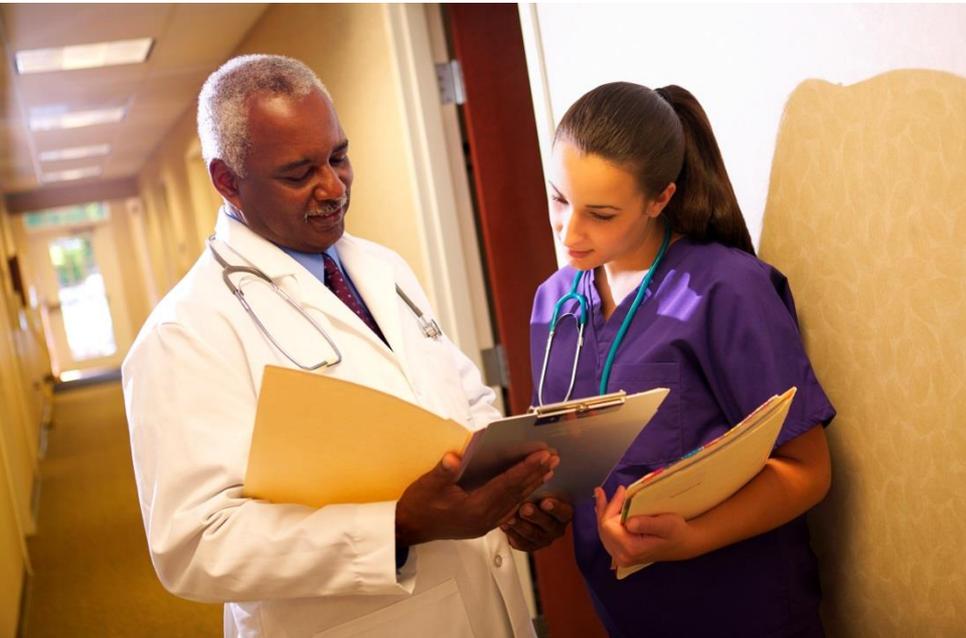




Online Provider Directory Review



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The Importance of Provider Directories

- Directories connect beneficiaries and caregivers to network providers
- Accurate information is critical
- Errors jeopardize the beneficiary's ability to connect with a needed provider

Plan Selection

- Review one-third of all Parent Organizations (POs) each year
- Blended Sample
 - New POs
 - 10 POs re-reviewed each year
 - Random selection of remaining POs

Review Methodology

- One contract per PO
- Mix of urban/rural providers
- 108 providers, split evenly between 4 provider types
- Verify accuracy of all locations listed for each provider

Important Points to Remember

- Review is from a beneficiary perspective
 - What is the beneficiary experience when they call the office regarding the availability or location of providers?
- CMS's review is transparent
- We only verify what has been included in the Plan's online directory

Review Process

- Calls made to selected providers
- Initial deficiencies identified and sent to PO
- PO responds to deficiencies
- CMS reviews PO responses
- CMS provides final result to PO
- PO the has 30 calendar days to make corrections to online directories after final results are communicated

Call Script

- Introduction and notification that the caller is from CMS.
- Confirm the person on the phone can answer questions.
- Caller reviews each element
- If an element is incorrect, caller obtains correct information.
- Caller asks about provider's other locations, if applicable.

Elements Reviewed

- Provider Name
- Practice Name
- Specialty
- Acceptance of plan
- Address, including suite number
- Accepting/not accepting new patients
- Phone number

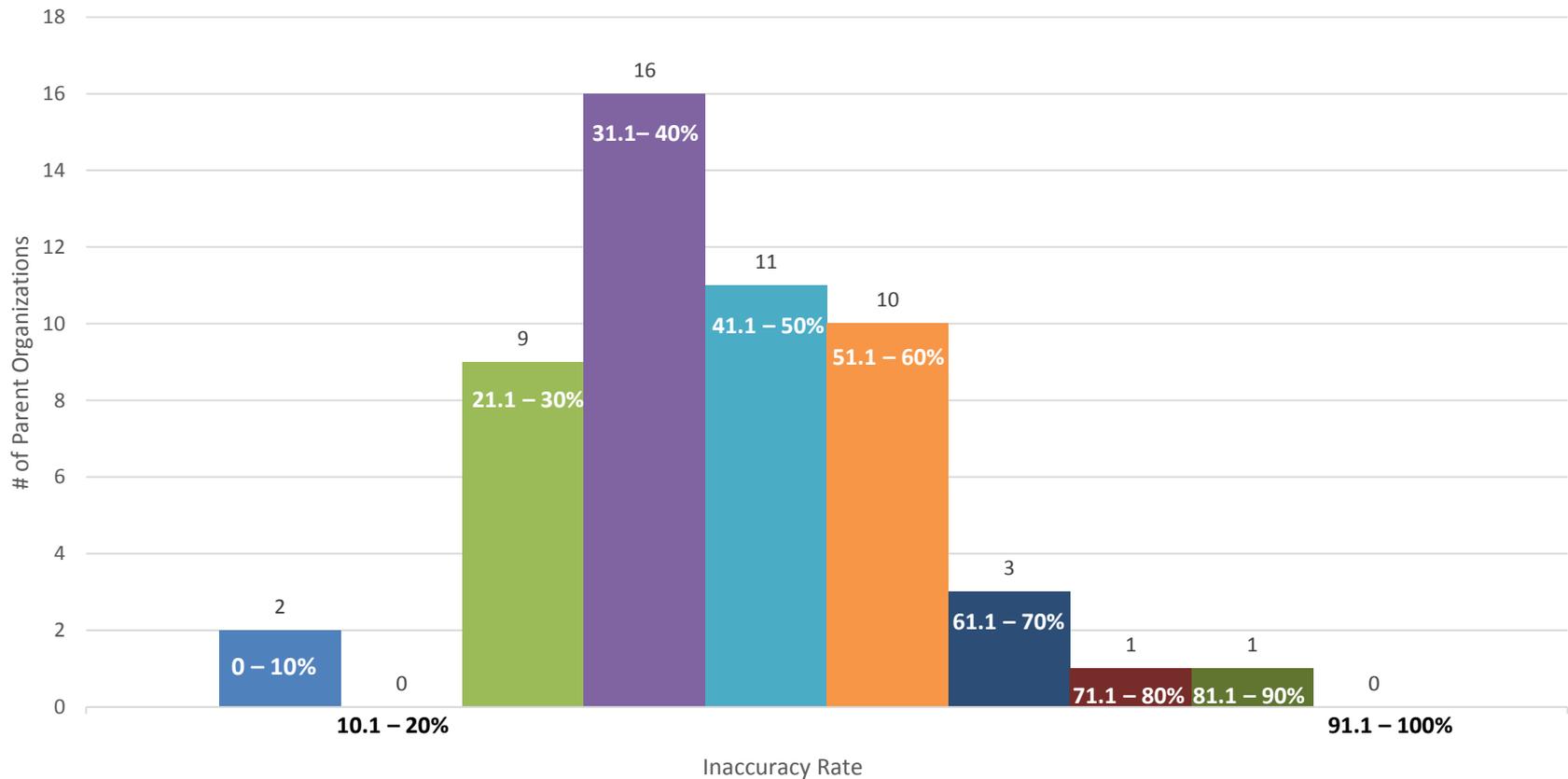
Scope of 2016 Review

- 54 POs reviewed
- 5,832 providers contacted
- 11,646 number of locations reviewed

Findings

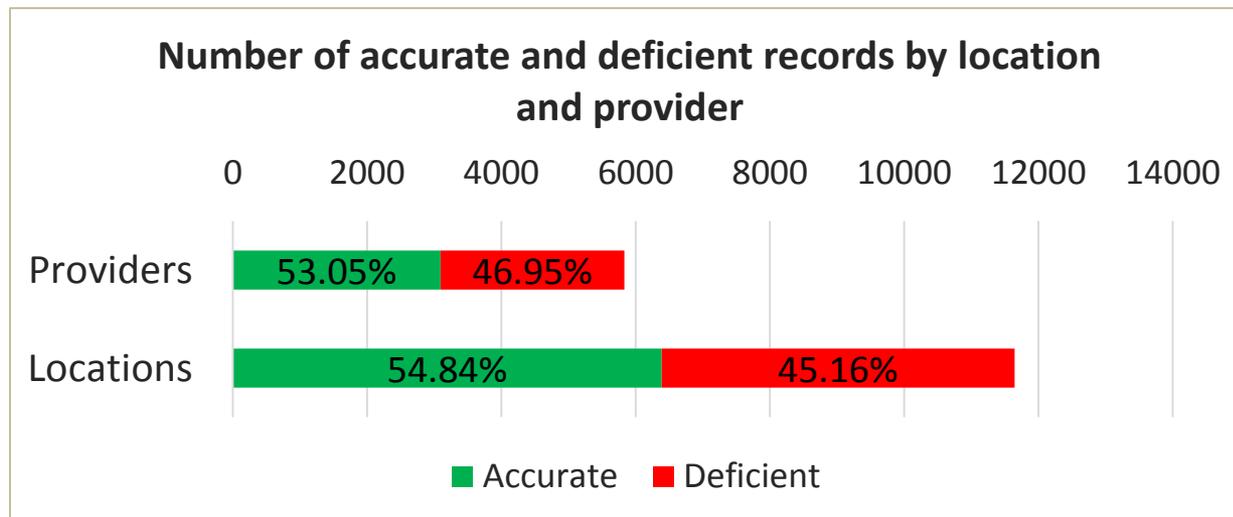
- 5,257 (45.86%) Locations had errors
- Errors ranged from 1.77% to 86.53% across all POs reviewed, with an average of 41.37%
- About half of the POs (26) fell between 30% and 50% deficient

Range of Provider Directory Deficiencies



Findings – A Closer Look

- Provider Level - of the 5,832 providers reviewed, 3,095 (53.07%) had no final deficiencies. The remaining 2,737 (46.93%) providers reviewed had at least one deficiency at one of their listed locations.
- Location Level - of the 11,646 provider locations reviewed, 6,389 (54.86%) had no final deficiencies. The remaining 5,257 (45.14%) locations had at least one final deficiency.



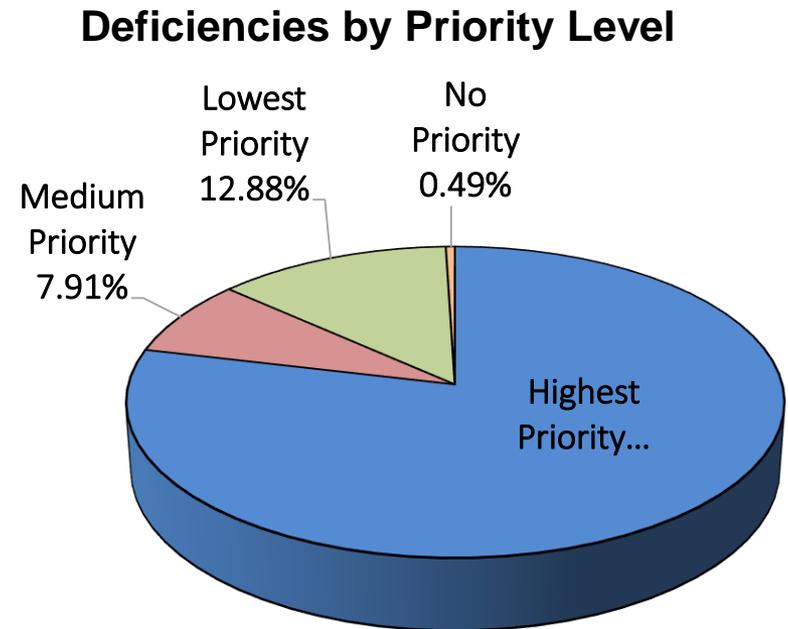
Priority Rating of Deficiencies

- Ratings were developed based on the impact to beneficiary seeing the provider

Deficiency Types	Priority Rating
Provider should not be listed in the directory at this location	highest
Provider should not be listed in the directory as treating patients for this specialty	highest
Phone number needs to be updated	highest
Address needs to be updated	medium
Address (suite number) needs to be updated	lowest
Provider is NOT accepting new patients	lowest
Provider IS accepting new patients	lowest
Specialty needs to be updated	lowest
Provider name needs to be updated	none

More Than $\frac{3}{4}$ of Findings Were the Highest Priority

Priority	Deficiency Type	Number of Locations with Deficiency Type
Highest	Provider should not be listed in the directory at this location	3,606
Highest	Provider should not be listed in the directory as treating patients for this specialty	11
Highest	Phone number needs to be updated	521
Medium	Address needs to be updated	416
Lowest	Address (suite number) needs to be updated	217
Lowest	Provider is NOT accepting new patients	314
Lowest	Provider IS accepting new patients	139
Lowest	Specialty needs to be updated	7
None	Provider name needs to be updated	26
	Total Number of Locations with Deficiencies	5,257



Reasons Provided for “Provider Not at Location”

- Provider works at another office in the same practice or medical group, but does not work at the office location listed
- Provider never worked at location listed
- Provider retired or left practice
- Provider has admitting privileges or only sees established patients at the location
- Patients are unable to make an appointment with the provider at this location (i.e. uses location to view x-rays)
- Provider covers for other physicians at the location

PO size and Urban/Rural Designation

- Medium sized organizations performed only slightly better than small and large organizations

PO Size	Locations	Percentage of Locations	Locations with at Least One Deficiency	Percentage of Locations with at Least One Deficiency by PO Size
Large	3,732	32.05%	1,786	47.86%
Medium	4,109	35.28%	1,633	39.74%
Small	3,805	32.67%	1,838	48.30%
Total	11,646	100%	5,257	45.14%

- Urban designated locations had slightly more deficiencies than rural locations

Designation	Locations	Percentage of Locations	Locations with at Least One Deficiency	Percentage of Locations with at Least One Deficiency by Urban/Rural Designation
Urban	9,608	82.50%	4,476	46.59%
Rural	2,038	17.50%	781	38.32%
Total	11,646	100%	5,257	45.14%

Findings by Provider Type

- Ophthalmologists had a markedly lower deficiency rate
- About half of cardiologist and PCP locations had deficiencies, while only one-third of ophthalmologist locations had deficiencies
- Cardiologists were listed at more locations on average than other specialists, while PCPs were listed at fewer locations than specialists

Provider Type	Providers Reviewed	Locations Reviewed	Percentage of Locations	Locations with a Deficiency	Percentage of Locations with a Deficiency by Provider Type
Cardiology	1,450	3,616	31.05%	1,843	50.97%
Oncology	1,311	2,480	21.29%	1,140	45.97%
Ophthalmology	1,433	3,061	26.28%	1,035	33.81%
PCP	1,638	2,489	21.37%	1,239	49.78%
Total	5,832	11,646	100.00%	5,257	45.14%

Providers with Multiple Locations

- Providers with multiple locations were deficient at a greater rate than those listed at only one location

Number of Provider Locations	Providers	Percentage of Providers	Providers with at Least One Deficiency	Percentage of Providers with x Locations with at Least One Deficiency
1	3,322	56.96%	1,001	30.13%
2	1,287	22.07%	730	56.72%
3	515	8.83%	360	69.90%
4	259	4.44%	220	84.94%
5	155	2.66%	139	89.68%
6	121	2.07%	117	96.69%
7 or more	173	2.97%	170	98.27%
Total	5,832	100%	2,737	46.93%

Providers with Multiple Locations

- Providers with multiple locations and at least one deficient location tended to have multiple deficient locations

Number of Locations Listed (<i>m</i>)	Number of Locations with a Deficiency (<i>n</i>)							Total Providers with <i>m</i> Listed Deficient Locations	Number of Providers with No Deficient Locations	Total Number of Providers with <i>m</i> Listed Locations
	1	2	3	4	5	6	7			
1	1,001	-	-	-	-	-	-	1,001	2,321	3,322
2	499	231	-	-	-	-	-	730	557	1,287
3	144	131	85	-	-	-	-	360	155	515
4	46	73	50	51	-	-	-	220	39	259
5	17	30	29	39	24	-	-	139	16	155
6	6	9	18	30	23	31	-	117	4	121
7	3	3	8	9	8	6	6	43	3	46

► Example interpretation of Row Three (providers with three locations):

3	144	131	85	-	-	-	-	360	155	515
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- Of the 515 total providers with three listed locations, 155 had no deficient locations
- Of the remaining 360 providers with at least one deficient location:
 - 144 had one deficient location
 - 131 had two deficient locations
 - 85 had three deficient locations

As Locations Increase, the Chance for Deficiency Grows Exponentially

- All providers with more than seven locations had at least one deficient location

Number of Locations Listed (m)	Number of Locations with a Deficiency (n)																Total Providers with m Listed Deficient Locations	Number of Providers with No Deficient Locations	Total Number of Providers with m Listed Locations
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16			
1	1,001	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,001	2,321	3,322
2	499	231	-	-	-	-	-	-	-	-	-	-	-	-	-	-	730	557	1,287
3	144	131	85	-	-	-	-	-	-	-	-	-	-	-	-	-	360	155	515
4	46	73	50	51	-	-	-	-	-	-	-	-	-	-	-	-	220	39	259
5	17	30	29	39	24	-	-	-	-	-	-	-	-	-	-	-	139	16	155
6	6	9	18	30	23	31	-	-	-	-	-	-	-	-	-	-	117	4	121
7	3	3	8	9	8	6	6	-	-	-	-	-	-	-	-	-	43	3	46
8	-	1	4	1	5	5	4	5	-	-	-	-	-	-	-	-	25	-	25
9	1	-	2	1	2	1	4	7	11	-	-	-	-	-	-	-	29	-	29
10	1	-	-	1	1	2	4	7	1	1	-	-	-	-	-	-	18	-	18
11	1	-	-	-	5	-	2	2	3	2	4	-	-	-	-	-	19	-	19
12	1	-	2	1	-	-	1	3	-	5	2	1	-	-	-	-	16	-	16
13	3	-	1	-	-	-	-	1	-	-	-	1	-	-	-	-	6	-	6
14	-	-	-	-	-	-	-	-	-	-	-	1	-	1	-	-	2	-	2
15	-	-	-	-	-	-	-	-	-	-	-	-	1	1	-	-	2	-	2
16	1	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	2	-	2
17	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	7	8	-	8
Total Providers with n Deficient Locations	1,724	478	199	133	68	45	21	25	15	9	6	4	1	2	-	7	2,737	3,095	5,832

CMS's Decision Process

- Practice Names were not marked as deficiencies
 - Out of 8,540 provider directory records with a practice name listed, 1,121 records were inaccurate
 - POs were asked to review and correct provider practice names as needed
- Calls were made to verify information was corrected

Work With Providers

- Educate - In many cases, providers did not know they were contracted with the PO.
- Communicate – Work with providers to ensure process is in place for contacting plan of changes.

Follow-up Question	Applicable Records	Response: "Undetermined"	Response: "Yes" or "No"	Yes/No response as percent of applicable records
Has the plan been notified the provider no longer accepts the plan at this location?	1,103	1,036	67	6.07%
Has the plan been notified of the change in new patient acceptance?	1,449	1,381	68	4.69%
Has the plan been notified of the change in address?	478	448	30	6.28%

Lessons Learned/ Helpful Suggestions

- Parent Organizations should:
 - List providers once for each location
 - Review number of locations for each provider
 - Audit data
 - Make sure group practices provide data on what locations a provider practices versus listing every provider at every location
 - Use claims data based on location and provider, not just based on provider
 - Notate providers who only see a subset of members
 - List providers once they are active or notate active date

Plan Summary Reports

ACME Health Insurance Company			
Medicare Advantage Provider Directory Review - PY2016			
Contract Number:	H5555		
Primary Plan Marketing Name:	ACME Medicare Gold		
Back-up Plan Marketing Name:	ACME Medicare Silver		
State of Service Area:	NE		
PO Review Designation (Urban/Rural):	Rural		
Review Level	Reviewed	Deficient	Percentage Deficient
Providers	108	62	57.41%
Locations	297	129	43.43%
PO ranking based on deficiency rate by location: 35 out of 54			
Items Deficient	Locations	Percentage of Locations	Priority
Provider should not be listed in the directory at this location	100	33.67%	3
Phone number needs to be updated	5	1.68%	3
Phone number needs to be updated; Address needs to be updated	1	0.34%	3
Address needs to be updated	2	0.67%	2
Address needs to be updated; Provider is NOT accepting new patients	1	0.34%	2
Address (suite number) needs to be updated	2	0.67%	1
Provider is NOT accepting new patients	18	6.06%	1

Future Compliance Decisions

- For the first year, the final priority rating for a location was based on the highest priority rating for that location
 - For example, if the location had the wrong address (medium priority), wrong suite number (lowest priority), and wrong telephone number(highest priority)
 - The result would be that the location was assigned the highest priority overall
- CMS is currently considering whether to accumulate findings from year to year
- CMS found directories that failed to notate whether providers were accepting/not accepting patients for some or all provider types.
 - These deficiencies are separate from the accuracy of the provider directory
 - Any associated compliance actions will be taken outside of the process discussed today

2017 Review

- 64 Parent Organizations
- Review has already begun
- Simplified spreadsheet
- Review will look at the same provider types

Questions?

