



07/25/14

Via E-Mail

Thomas McMahan, Senior Policy Advisor
Department for Medicaid Services
Cabinet for Health and Family Services
275 E. Main St. 6W-A
Frankfort, KY 40621

Re: Request for Corrective Action Plan-CC2014FC-1

Dear Mr. McMahan:

Please accept this correspondence in response to your notification dated July 11, 2014 with regard to a request for a Corrective Action Plan for the following cited deficiency:

Identifying #	Contract Section	DEFICIENCY
CC2014FC-1	35.4 Children in Foster Care	Coventry failed to give the Department and DCBS the require forty-eight (48) hour notice before denying a request for continued stay.

Per your communication, CoventryCares of Kentucky (CoventryCares) was not in substantial compliance by submitting notifications about the discontinuance of services for foster children in residential facilities within the forty-eight hour notification timeframe.

Please be advised that CoventryCares of Kentucky has investigated this request thoroughly and has identified the root causes. In the examples provided to CoventryCares, there is evidence to show in some of the cases the facility failed to communicate in a timely manner concerning changes in the planned discharge date, therefore it adversely effected the forty-eight hour notification period. In another scenario, the facility failed to obtain pre-authorization for the stay within the twenty-four hour timeframe. Days were covered per the administrative agreement as approved by the Department however, no other days were covered.

It also appears the notifications were being sent two days before the denial was to occur but not necessarily forty-eight hours prior to the denial. This has been addressed through education and coaching that was conducted on 6/6/14. All staff has been advised to communicate to the Department and DCBS forty-eight hours prior to a denial.

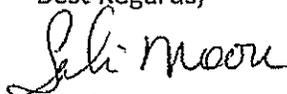
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CoventryCares of Kentucky is a Medicaid product of Coventry Health and Life Insurance Company

CoventryCares will submit notification to the Department indicating the last covered day (in which the entire discharge day is covered until 11:59 pm). CoventryCares will document all notifications in the spreadsheet attached for the next three months beginning August 1, 2014. This document will be reviewed and monitored by the Director of Clinical Health Services on a monthly basis. Any notifications sent outside of the forty-eight hour timeframe will be addressed by the Director of Clinical Health Services and appropriate actions will be taken. As a result, the Director of Clinical Health Services will report any corrective actions taken with his/her staff to ensure compliance with the forty-eight hour notification period.

CoventryCares of Kentucky is committed to meeting our obligations. We believe this letter answers your concerns. Should you have any questions or concerns, please feel free to contact me.

Best Regards,



Sabrina Moore
Plan Compliance Officer

Cc: Michael Murphy

