CABINET FOR HEALTH AND FAMILY SERVICES
DEPARTMENT FOR MEDICAID SERVICES

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Audrey Tayse Haynes
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May 12, 2014

Michael Murphy
CEO, Coventry Cares
9900 Corporate Campus, Ste. 1000
Louisville, KY 40223

Re: CC2014SP-1

Dear Mr. Murphy:

Please accept this correspondence as notification from the Commonwealth of Kentucky, Department for Medicaid Services ("Department") that CoventryCares of Kentucky ("CoventryCares") is not in substantial compliance with certain material provisions of the Managed Care Contract ("Contract") between the Commonwealth of Kentucky and Coventry Health and Life Insurance Company. Pursuant to Section 39.4 of the Contract, CoventryCares shall submit to the Department a Corrective Action Plan within ten (10) business days following the date of this notification delineating the time and manner in which each deficiency cited below is to be corrected.

Identifying #	Contract Section	DEFICIENCY
AG2014SP-1	29.11 Supplemental Payments to PCPs	Coventry failed to make timely supplemental payments for ACA enhanced reimbursement.

Cash Family Practice, PLLC located in Princeton, KY has been waiting for over a year to receive supplemental payment as outlined in Section 29.11 of the contract, which states, *"The Contractor shall pass on the full benefit of the payment increase to Eligible Providers…"* Cash Family Practice has made several attempts to receive this payment, including phone calls and emails. A detailed list of these contacts, provided by Karen Winters of Cash Family Practice is enclosed.

Division of Policy & Operations Director Lee A. Guice has been in contact with Coventry in attempts to resolve this issue. However, it beyond the scope of the Department's involvement to make internal policy decisions concerning claims payment.

Please note this deficiency has been assigned a unique identifier. Include this number with any correspondence concerning this issue. Failure to do so will result in your submission being rejected. I look forward to receiving Coventry's Corrective Action Plan and will be available for your questions throughout the process.

Sincerely,

Thomas McMahan
Senior Policy Advisor
Managed Care Oversight
Department for Medicaid Services

cc: Lawrence Kissner, Commissioner, Department of Medicaid Services
Lee A. Guice, Director of Policy and Operations, Department of Medicaid Services
Christina Heavrin, General Counsel, Cabinet for Health and Family Services
Elizabeth Justus, Manager, Managed Care Oversight, Department of Medicaid Services

Cash Family Practice

4-9-2013 fax blast from Coventry Cares-instructs physicians to attest. Dr. Ralph Cash and Barbara Hickman, APRN both attest. Coventry fax states: At the end of each calendar quarter, the KY Department Medicaid Services will obtain a claims listing from each managed care organization that identifies the payments made to attested providers for the codes eligible for the enhanced rate. The Department will calculate the providers payment as the difference between the Medicare rate for Kentucky for the billed code and what the MCO has paid the provider. The Department will provide a lump sum payment to the MCO with instructions on the amount to pay each attested provider. The MCO will then pass the payment in the month following the end of each quarter to the master vendor of the provider based on their preferred payment method."
5/28/2013 correspondence from Frankfort Letter #A-94. "when calculating the payments, DMS had to reconcile the rendering providers' NPI submitted on the claim detail from the MCOs' with the provider IDs in the Medicaid Management Information System (MMIS). If DMS needed the provider's taxonomy to make this unique identification and one was not provided on the claim submitted to the MCO, the claim was not considered for an adjusted rate payment. If you need to add your taxonomy on previously submitted claims, please contact your MCO provider representative for the correct procedure. ***At this point I did NOT know to take any action, because our Coventry claims were being paid and I had NOT received any Coventry communication related to NPI/Taxonomy numbers/claim.
All information above and below shared with my biller. All communication from Coventry regarding NPI/taxonomy numbers send to my biller.
10/23/2013 I contacted Coventry rep by email Gina Gullo because no ACA payments received
10/24/2013 email back from Gina Gullo, "you should have received your ACA payments around the 1st week of October for the first quarter. Have you checked your EFTs? If it was send by EFT, then you should have received in the mail a list of patients for whom that payment was applied." (I have copy of emails)
10/24/2013 I email Gina Gullo again, informing her that our biller nor myself are able to locate any ACA payments.
10/24/2013 Gina Gullo emails "If you cannot find, I will have my contact in Finance pull the info for you."
10-24-2013 I email Gina Gullo and request Coventry Finance department send me proof of payment.
10-25-2013 Gina Gullo emails "Finance could not find a payment for Ralph L. Cash or Cash Family Practice in our ACA database for the 1st quarter. We actually just received the following info/instructions today: Coventry sends all approved claims to the State each quarter. The State accepts or rejects the claims based on various components. ACCEPTED claims are then reviewed for ACA payment eligibility. The State determines which claims are eligible for payment and calculates those payments. Questions regarding payments, or lack thereof, should be directed to the State."
"Please let me know what the State tells you."
10/25/2013 I called the Commissioner's office in Frankfort, spoke with Meagan who advised me to speak with Medicaid Policy Office regarding not receiving any enhanced payments. Each time I explained Cash Family Practice, PLLC had already received ACA payments from Wellcare and KY Health Spirit.
10/25/2013 I called the Medicaid Policy office in Frankfort and spoke with Lisa Vaughn, who inquired as to whether or not Ralph L. Cash, M.D. and Barbara L. Hickman APRN had attested and stated that someone would call me back.
10/28/2013 Lisa Vaughn called back from Frankfort Medicaid office and requested I sent proof of attestation as she couldn't verify that we had completed attestation.
10/28/2013 I faxed proof of attestation to Lisa Vaughn at 502-564-0039
10/29/2013 I called Lisa Vaughn to confirm faxed proof of attestation received by her office. Lisa states forwarded to her medical director and waiting for a response.
11/12/2013 Dr. Cash personally calls and attempts to speak with Lee Guice multiple times and NEVER speaks personally with Ms. Guice. Only allowed to relay messages to her through her staff.

Cash Family Practice

11/12/2013 I called Lisa Vaughn and she states her office is waiting on a call back from Coventry Cares of Kentucky and stated she didn't know why we hadn't received the ACA payments from Coventry.
11-19-2013 Left voicemail for Lisa Vaughn as no follow-up from Lisa or her director.
11-19-2013 I receive an email from Gina Gullo regarding a taxonomy edit implementation stating that Cash Family Practice had 146 claims that did not include an NPI and/or a taxonomy number. I have the entire email which states the taxonomy has to match what I have on file with DMS or the claims in the future would be denied. No need to resubmit these claims.
11-26-2013 I left a message for Lisa Vaughn to call me
11-26-2013 Holly Garcia from Coventry calls and verified NPI and taxonomy numbers. There was a zero left out of B. Hickman's taxonomy number and a "z" left out of the group taxonomy code with the information Holly Garcia was able to pull over from the State files. She advised me to call Frankfort.
11-26-2013 I called and spoke with Lisa Vaughn and she verified that the state had the correct NPI and taxonomy numbers for both Dr. Ralph Cash and B. Hickman. Lisa was able to verify the group NPI number and she never could find the group taxonomy number to verify it.
11/26/2013 email to Holly Garcia with information I received from Lisa Vaughn. Holly Garcia out until 12-2-2013
11-27-2013 Lisa Vaughn called me back and stated on 11-27-2013 between 11am and 12N there would be a meeting between Coventry Cares of Lee Guice and that the problem with our office not receiving enhanced payments was to be discussed. Lisa told me our claims had to contain the rendering taxonomy, the billing taxonomy and the rendering NPI numbers. She told me all our claims would have to be resubmitted. I told her we had NO claims denied by Coventry and that Coventry had communicated to us that if claims did not contain all the correct information as of 11-24-2013 denials would take place. Lisa Vaughn said wait until you speak with your rep on Monday.
11/20/2013 and 11-27-2013 fax blast from Coventry-claims will be denied beginning 12-2-2013 if rendering/billing NPI/taxonomy numbers not included. Forwarded info to our biller/Edgemed.
11-27-2013 respond to fax blast/Teresa Koreck who forwards my email to her director, Laura Malloy, "she will address your concerns upon her return Monday, December 1, 2013.
12-5-2013 I called Lisa Vaughn again to re-verify our NPI/taxonomy numbers. I asked IF the problem could be with our clearinghouse getting the required information in the correct place. I was told to call the Medicaid claims office 1-800-807-1232. Passed this info to our biller and Holly Garcia at Coventry
12-6-2013 Holly Garcia emails me, "I need to speak to you to further understand why the Medicaid claims office needs to be involved in our resubmittal of a test claim. Also, our claims department is currently researching the option of you resubmitting all of your claims once you have corrected your billing and rendering taxonomies. Unfortunately, I do not have an answer yet.
Mutiple phone calls between myself and our biller related to the above issues.
1-7-2014 I email Holly Garcia and Laura Malloy.....because nothing resolved.....
1-8-2014 Ms. Malloy wants some claim numbers for new claims sent as she wanted to look in the Coventry system regarding NPI/taxonomy.
1-8-2014 email from Holly Garcia, "sorry, out on vacation, wants to set up conference call to discuss remaining taxonomy concerns and further detail and supply you with a status update on the historical claims that are impacted by the ACA payment." I then speak with Holly on the phone and tell her that I don't object to a conference call but that I do NOT see what that will resolve.....
1-8-2014 Laura Malloy sends an email stating that she will pass information to Holly Garcia and she will coordinate a meeting.
1-8-2014 email from myself to Laura Malloy and Holly Garcia, everything MUST be correct on claims as we are getting paid from COVENTRY!! We had all new claims on hold since 12-2-2013 because of all the confusing information

Cash Family Practice

1-8-2014, 1-9-2014 multiple emails back and forth between myself and Laura Malloy.....needs comment in box 19, how many claims?????
1-13-2014 I send an email to Laura Malloy requesting permission to resubmit all old claims, asking what comment she wants in box 19, does she want paper or electronic...
1-13-2014 email from Laura Malloy "hold please until I receive confirmation from our CSO.
1-30-2014 Leave message for Lisa Vaughn to call me as I cannot resolve this problem.
1-31-2014 Lisa Vaughn calls me, I explain the issue above remains unresolved, she tells me she will speak with her director and get back with me.
1-31-2014 receive email from Lisa Vaughn requesting I put all information and dates in an email
1-31-2014 above request completed and email to Lisa Vaughn