

DDD SHOUT

PROVIDER NEWSLETTER

Volume X - July 2020

Application Date Extended to Apply for HHS Provider Relief Fund Distributions

On June 9, the U.S. Department of Health and Human Services (HHS), through the Health Resources and Services Administration (HRSA), announced \$15 billion in additional distributions from the CARES Act Provider Relief Fund available to eligible Medicaid and Children's Health Insurance Program (CHIP) providers that participate in state Medicaid and CHIP programs.

The new deadline to apply for the Provider Relief Fund is August 3, 2020.

HHS has published more information on the [Provider Relief fund website](#) including [a set of instructions for providers](#) to submit an application and a link to [the portal to complete the application process](#).

Focus Vendor Incident Reporting Application Update

The new electronic submission process for Incident Reports is now available to vendors and providers through the Focus application. As outlined in previous communications, this is an addition to existing submission methods. The Division has several resources available to help vendors use this new Focus application.

- [User's Guide](#)
- [Video Demo](#)
- [Frequently Asked Questions](#)

Please note, at this time there is no way to print or download the incident report after it is submitted. The only way to currently have a record of the incident report is to take a screenshot of the entered incident page before submitting. Please continue to submit questions or recommendations regarding this Focus application using this form <https://forms.gle/bEspvVFvNiP3Hzv77>.

Medicaid Program Integrity

The Centers for Medicare and Medicaid Services (CMS) define Medicaid Program Integrity as the "...planning, prevention, detection, and investigation/recovery activities undertaken to minimize or prevent over-payments due to Medicaid fraud, waste, or abuse." DDD ALTCS services are funded by Medicaid, and therefore, the Division and its Qualified Vendors have a responsibility to ensure the integrity of the Medicaid program.

Division and Vendor Responsibilities

As part of Medicaid Program Integrity, DDD and Qualified Vendors must provide clear information and guidelines regarding the following to all employees and service providers:

1. Policies and procedures for the prevention, detection and reduction of fraud, waste and abuse (FWA);
2. Effective training and education regarding FWA and its specific laws such as the False Claims Act, Stark Law and Anti-Kickback Statute;

3. The rights of employees to be protected as whistleblowers; and
4. How to report suspected fraud, waste and abuse.

Information about Qualified Vendor responsibilities can be found in section 6.5.17 of the [DDD Standard Terms and Conditions for Qualified Vendors](#) and in [Division Provider Policy Manual Chapter 20](#).

Credible Allegation of Fraud (CAF)

Division Operations Policy Manual Chapter 103 and 42 CFR 455.23 defines a credible allegation of fraud (CAF) as:

“A credible allegation of fraud may be an allegation, which has been verified by the State, from any source, including but not limited to the following:

1. Fraud hotline complaints
2. Claims data mining
3. Patterns identified through provider audits, civil false claims cases, and law enforcement investigations

Allegations are considered to be credible when they have indicia of reliability and the State Medicaid agency has reviewed all allegations, facts and evidence carefully and acts judiciously on a case-by-case basis.”

The AHCCCS Office of the Inspector General (OIG) is responsible for investigating CAFs for fraud, waste and abuse submitted to DDD or AHCCCS directly.

- AHCCCS OIG may place a suspension on a vendor while conducting a preliminary investigation.
- AHCCCS OIG identifies any access to care or other good cause exceptions through their Clinical Quality Management (CQM). CQM works with the health plans’ Quality Management (QM) to seek answers regarding network capacity, transitional planning, Health Resources Services Administration (HRSA) designated providers, etc.
- CAF suspensions that have law enforcement exceptions are NOT shared with the Division or DDD Health Plans.
- CAF suspension payments from AHCCCS OIG are NOT date of service driven; meaning claims with dates of service prior to the suspension notice are irrelevant. The suspension notice STOPS ALL PAYMENTS to the vendor identified as of the date of the notice, regardless of the date of service.

In 2019, AHCCCS-OIG investigated many credible fraud allegations across the state. These investigations led to payment suspensions for several HCBS vendors providing these DDD/ALTCS services:

- Therapy Services
- Transportation Services
- Group Home Services

During their investigations, AHCCCS-OIG uncovered a variety of improprieties including:

- Failure to adhere to medical documentation requirements;
- Creating false documentation;
- Failure to adhere to Provider Participation Agreement and/or Group Biller Participation Agreement;
- Failure to adhere to Qualified Vendor Agreement with DES/DDD;
- Providing services outside scope of practice;
- Providing services by unregistered providers;
- Providing services by unlicensed and/or unqualified providers;
- Providing services without evidence of clinical supervision;
- Billing for no show appointments and canceled appointments;
- Billing for services that they knew, or should have known, could not have been provided as claimed.
- Billing for services not provided.

If you have any questions about CAF or other FWA related inquiries, please contact the Division’s Program Integrity Unity (PIU) via email at DDDFWA@azdes.gov.

DDD Town Hall Meetings

The Office of Individual and Family Affairs (OIFA) continues to host town hall meetings for members, families and providers. The next town hall meeting will be held on **Thursday, July 30, 2020, from 6:00 p.m. to 8:00 p.m.**

The information for accessing the meeting is listed below:

- WebEx: <https://azgov.webex.com/azgov/j.php?MTID=m7d9d1dfe510d3cd2521867cca7e5fa8e>
- Phone: 602-666-0783 and use Access Code: 133 406 7723

Please share this information with the members and families you serve and encourage them to participate. The town hall schedule can be found on the main DDD webpage, <https://des.az.gov/services/disabilities/developmental-disabilities>, in the “Upcoming DDD Events” section.

Get Caught Up

Did you know the Division posts vendor announcements and editions of the Shout on the web? Get caught up and stay informed on all of the recent vendor communications, <https://des.az.gov/services/disabilities/developmental-disabilities/vendors-providers/vendor-announcements>.

If you have any information that you would like to see in the DDD Shout, please email your suggestions to DDDCommunications@azdes.gov.

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