Today’s Agenda

- Background
- Experience
- RADV at a Glance
- IVA Program Components
- Conflict of Interest Standard
- Timelines
- Why Choose Cognisight
- Before Sample Is Received
- Q&A
Background: Who We Are

- Wholly-owned subsidiary of
  - Greater Rochester Independent Practice Association (GRIPA)
  - Rochester Regional Health
    - $2+ billion health system
    - Four full service acute hospitals
    - 14,000 physicians
    - 150 locations serving Western NY

- Full service risk adjustment vendor in Rochester, NY
Background:
What We Do & Who We Help

- **Services**
  - CognisightDX™ Analytics
  - Chart Reviews
  - Health Assessments
  - RADV/IVA
  - Risk Verification
  - Provider & Coder Training

- **Markets**
  - Medicare Advantage
  - Independent Practice Associations
  - Accountable Care Organizations
  - Medicaid Managed Care
  - Health Insurance Exchange
  - PACE/Duals

1 In development
57 clients in 29 states rely on Cognisight

= Cognisight clients
Providing services, including RADV support, since risk adjustment inception in 2007

National RADV audit experience

Best practice auditing via risk verification

100% review of finds prior to submission

While audit work is new to some issuers, it’s not new to us
Experience:
Coder Expertise

- IVA coder certifications
  - CCS  Clinical Coding Specialist
  - CPC  Certified Professional Coder
  - CRC  Certified Risk Adjustment Coder

- Seasoned, onshore coding professionals
  - 16 years average experience
  - Ensure HIPAA compliancy and protection
Commercial RADV six step process

- **STEP 1** Sample Selection
- **STEP 2** IVA
- **STEP 3** SVA (subset of IVA)
- **STEP 4** Error Extrapolation
- **STEP 5*** Appeals
- **STEP 6*** Payment Adjustment

### Demographics
- Source documentation level of enrollment
- Missed HCCs

### HCCs
- Substantiate HCCs
- Missed HCCs
- Source documentation level of enrollment

*Not included in 2015 IVA pilot*
IVA Program Components

- **STEP 1**: Sample Selection
- **STEP 2**: IVA
- **STEP 3**: SVA (subset of IVA)
- **STEP 4**: Error Extrapolation
- **STEP 5**: Appeals
- **STEP 6**: Payment Adjustment

- **Data Analytics**
- **Verification & New Diagnosis Capture**
- **Appeals Support**
- **Chart Retrieval**
- **Demographic Review**
- **Project Tracking & Reporting**
- **HCC & Demographic Audit**
- **Documentation & Quality Control**
- **Dedicated Account Management**

*Not included in 2015 IVA pilot*
IVA Program Components:

Data Analytics

- Recommended for precise targeting
  - Alternate pursuit
  - Missed HCCs
IVA Program Components:
HCC Audit Chart Retrieval Process

1: Receive sample from HHS & reconcile w/ existing charts
2: Receive client data via secure FTP
3: Run (or reuse) analytics to identify appropriate charts w/i 200 member samples
4: Identify charts location—PCP, specialist, facility
5: Mail letter to provider office explaining why charts are requested
6: Calls placed to verify letter receipt & willingness to provide chart
7: Log records in data system as they’re received
8: Follow up calls made for unfulfilled chart requests
9: Bi-directional medical record review for HCC capture/substantiation
10: Verify enrollment gender, age, metal level matches risk adjustment payment
11: 100% QA
12: Data uploaded to Web-Based RADV Audit Tool

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IVA Program Components:
Demographic Audit Medical Record Retrieval Process

1: Obtain demographic/enrollment source documentation
2: Complete demographic audit
3: Run (or reuse) analytics to identify appropriate charts for demographic sample
4: Identify charts location—PCP, specialist, facility
5: Mail letter to provider office explaining why charts are requested
6: Calls placed to verify letter receipt & willingness to provide chart
7: Log records in data system as they’re received
8: Follow up calls made for unfulfilled chart requests
9: Review medical records for unsubmitted diagnoses
10: 100% QA
11: Data uploaded to Web-Based RADV Audit Tool
IVA Program Components: Chart Retrieval

- Infrastructure in place to:
  - Initiate follow up
  - Track chart retrievals
- Agility with methods
- Timely escalation
• Review includes
  o Validation of diagnoses
  o Capture of new/missed diagnoses
  o No computer-aided algorithms
Validation of enrollment information via source documentation

- Issuer’s ID (masked/unmasked), 16-digit plan ID, CSR flag, rating area, age, gender, enrollment dates, metal level (premium), date of birth
- Source documentation includes
  - Original EDI transactions and/or images of paper applications
  - For members electronically moved to a new product
    - Need snapshot of prior enrollment, mapping/crosswalk logic, snapshot of new enrollment

Capture of missed HCCs
IVA Program Components:
Documentation & Quality Control

- Three key pieces of information captured
  - Substantiation of existing diagnosis and where information is held within record
  - New diagnostic information and where information is held
  - Verification of demographic data

- Bi-weekly reports review Cognisight findings throughout IVA process and prior to HHS submission
  - Minimum of two weeks for client review provided

- Quality control is paramount—100% of all information re-reviewed/over read
  - Exceeds HHS’ requirement
  - Protects client by ensuring all finds will meet standards; thereby minimizing discrepancies when SVA is performed

- All data kept on shore
  - Data not HIPAA-protected outside US
IVA Program Components: Appeals Support

- Cognisight will provide appeals support\(^1\) for those diagnoses that we substantiated via the RADV process

- Appeals support includes
  - Lead reviewer participation to join discussions with client and HHS
  - Documentation sharing, if applicable
    - Coding clinic
    - HHS documentation, etc.

- After handoff to SVA, Cognisight services are billable at an hourly rate of $125
  - For example, if Cognisight needs to conduct additional research into coding practices and guidelines

\(^1\) Not included in 2015 IVA pilot
IVA Program Components: Project Tracking & Reporting

- Client will be kept up to date while separation of duties between issuer and IVA is maintained
- Will be informed of both missed and failed records
  - For failed records, rationale based on current guidelines will be shared and alternate approaches determined
- Time for client to anticipate opportunity and review changes/issues to be built into timeline
Each IVA will be treated as an independent project

- Cognisight’s project management systems accommodate multiple, simultaneous work
- Data can be individualized or aggregated as needed

Reports to be provided

- IVA status report
  - Snapshot of overall progress on a state by state basis
  - HCC validation information and capture of missing HCCs
- IVA audit progress
  - Additional detail into each IVA on a provider by provider basis
  - Granular detail
- Validation report
  - Financial detail and HCC detail to demonstrate IVAs impact to client
### Status report sample

#### IVA Program Components: Project Tracking & Reporting, cont.

#### Supplement 1 pictured above
IVA Program Components: 
Dedicated Account Management

- Provides management of all Cognisight IVA service components
- Single point of contact
- Involves all key constituents from client organization
- Account manager has
  - Compliance/audit background
  - Project management experience
  - Account/client management experience
### IVA Program Components:
#### Roles & Responsibilities

<table>
<thead>
<tr>
<th>Task/Service</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide full administrative data set including member, provider, encounter data, pharmaceutical claim, and lab files.</td>
<td>Client</td>
</tr>
<tr>
<td>Apply data quality and trend analysis checks to identify missing or incomplete datasets.</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Share the member and HCC audit sample to be targeted as part of the RADV audit.</td>
<td>Client</td>
</tr>
<tr>
<td>Load the member and audit sample to identify all associated medical record chases to be targeted to substantiate/identify HCCs.</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Collect all targeted medical records from all providers and locations where an encounter for a targeted member has taken place.</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Perform a medical record abstraction of ICD9s to confirm the HCC targeted is present and to identify additional HCCs not otherwise known.</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Determine the best medical record(s) for submission to the IVA.</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Identify medical records with signature and/or credential impairments. Collect attestations from providers as necessary.</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Provide bi-weekly insight and reporting into HCC validation rates. Provide interim risk factor and financial impact (pre-risk pool).</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Perform enrollment validation checks and confirmation (e.g., issuers ID, 16 digit plan ID, CSR flag, rating area, age, gender, enrollment dates, premium/metal level, and date of birth).</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Review the submitted medical records to determine HCC validation and confirmation of additional HCC findings.</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Utilize 100% quality control review process for HCCs and demographics.</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Submit the necessary demographic information and medical records to HHS/CMS to perform the Secondary Validation Audit (SVA) via the Web-Based RADV Audit Tool.</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Provide observations to the health plan on validation rate and associated impact.</td>
<td>Cognisight</td>
</tr>
<tr>
<td>Support the health plan through the appeals process for both the IVA and SVA. (Not included in 2015 IVA pilot.)</td>
<td>Cognisight</td>
</tr>
</tbody>
</table>
### IVA Program Components: Data Needs

<table>
<thead>
<tr>
<th>Data Needs</th>
<th>Overall IVA</th>
<th>Demographic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Membership enrollment history</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Claims</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Provider information</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>EDGE server return files</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Electronic Remittance Advice (ERA)</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Source documentation for enrollment (834 transactions and/or paper enrollment copies)</td>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>

- Cognisight will provide data requirements document to client
- Cognisight will set client up with access to SFTP
- IT will be primary contact with client to send/receive data
## Conflict of Interest Standards

<table>
<thead>
<tr>
<th>Conflict of Interest Standards</th>
<th>Cognisight Meets Standard?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Issuer has no financial interest in IVA entity and vice versa, including team members, families, etc. Issuer’s management and their immediate families cannot have a financial interest in IVA entity.</td>
<td>Yes</td>
</tr>
<tr>
<td>Issuer’s directors and officers cannot serve on board of directors of IVA entity and vice versa.</td>
<td>Yes</td>
</tr>
<tr>
<td>IVA entity team members cannot have recently been a director or officer of Issuer.</td>
<td>Yes</td>
</tr>
<tr>
<td>IVA entity team members assigned to an issuer cannot be married to Issuer directors or officers.</td>
<td>Yes</td>
</tr>
<tr>
<td>IVA entity cannot have a role in establishing internal controls of Issuer related to ACA-HHS operated RADV process or serve in any capacity as an advisor.</td>
<td>Yes</td>
</tr>
<tr>
<td>IVA entity cannot have had role in executing ACA-HHS operated RADV process for Issuer.</td>
<td>Yes</td>
</tr>
<tr>
<td>§ 153.630 compliant.</td>
<td>Yes</td>
</tr>
</tbody>
</table>
Revised HHS RADV timeline\(^1\)

- **Fall 2015**: RADV Training
- **Winter 2015-16**: Choose IVA Vendor
- **Spring 2016**: IVA Vendor Selection to CMS
  - 03/15: CEO letters sent
  - Early April: Web-Based Audit Tool demo
  - 04/25: Designate senior official
  - Late April: Access to Web-Based Audit Tool
- **Summer-Fall 2016**: IVA Conducted
  - 05/09: IVA attestation forms to CMS
  - Early June: IVA access to Web-Based Audit Tool
  - 07/01: Sample received
- **Fall-Winter 2016-17**: SVA Conducted
  - 12/01: Handoff to SVA
- **Winter 2017**: Preliminary RADV Data Released

\(^1\) Updates from 02/17/16 REGTAP Training Series
Cognisight RADV timeline

**RADV Training**
- Fall 2015
  - Cognisight attending

**Choose IVA Vendor**
- Winter 2015-16
  - Cognisight to provide attestation & any other required info (TBD)

**IVA Vendor Selection to CMS**
- Spring 2016
  - Cognisight to register with Web-Based RADV Audit Tool
  - Cognisight available to respond to any CMS questions

**IVA Conducted**
- Summer-Fall 2016
  - Sample expected
  - Run/reuse analytics
  - “In-house” charts
  - Outstanding/add’l chart acquisition
  - Bidirectional audit
    - Includes 100% review
  - Demographic audit
    - Includes 100% review
  - Conduct biweekly meetings & reporting
  - Provide projected adjustment impact (pre-risk pool)
  - Data submitted via Web-Based RADV Audit Tool

**SVA Conducted**
- Fall-Winter 2016-17
  - Support appeals¹
    - Provide documentation

¹ Not included in 2015 IVA pilot year
Why Choose Cognisight

it all adds up to better health care™

• Audit Experience
• Infrastructure: Team, Processes, and Procedures
• Industry Leading Analytics
• Operational Mindset and High Touch Service
• Integrated, Flexible Approach
• Reporting Transparency
- CMS IVA vendor selection deadline approaching
- Recommend decision ASAP to lock in our IVA services

Capacity limited to ≤ 300 IVAs for 2015 DOS

Choose Soon
Cognisight provides clients with implementation webinars outlining pre-sample considerations and activities

- “IVA Readiness & Next Steps”
- “IVA Kickoff”
For more information, please contact:

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📞 585.662.4215

🔗 www.linkedin.com/in/kimbrowning1
How to Choose an Initial Validation Auditor:
Select the Contenders & Not the Pretenders