

Calendar Year (CY) 2014-15 Office of Inspector General (OIG) Risk Adjustment Data Validation Audit Medical Record Request FAQs for Behavioral Health Providers *Updated August 2019*

Why is Highmark Inc. (“Highmark”) requesting Medicare Advantage medical record information for an OIG Risk Adjustment Data Validation Audit?

Federal regulations require Medicare Advantage (MA) organizations and their providers and practitioners to submit medical records for the validation of risk adjustment data (42 CFR §422.310).

The OIG may identify one or more of your patients for data validation and request medical records to ensure that valid diagnoses, as a result of services you provided to MA beneficiaries, were sent to the Centers for Medicare & Medicaid Services (CMS).

Is this an audit?

Yes, this is an audit.

You are being asked to respond to a medical record request by an MA organization, (Highmark). This request is based on diagnosis data submitted to CMS as a result of services you provided to MA beneficiaries during calendar year (CY) 2014-15. The purpose of this request is to validate diagnoses that were sent to CMS for determining health status-adjusted payments under risk adjustment.

Are we required to participate in the Calendar Year (CY) 2014-15 OIG Risk Adjustment Data Validation audit?

Yes. Highmark requires that requested medical records be supplied per provider contracts. As a MA Network Provider, you are required to submit these records without charge.

Also, please note that Federal regulations require MA organizations and their providers and practitioners to submit medical records for the validation of risk adjustment data (42 CFR §422.310).

Will our claims be adjusted as a result of participating in the Calendar Year (CY) 2014-15 OIG Risk Adjustment Data Validation audit?

No, there are no financial ramifications (i.e., adjustments to claims) to providers as a result of participating in this medical record review.

Why can't Highmark get the information for the claims data submitted by Providers?

The purpose of this request is to validate diagnoses that were sent to CMS for determining health status-adjusted payments under risk adjustment. This is accomplished by getting a complete account of all diagnosis codes that are effectively supported by medical record documentation, and to evaluate the specificity of the ICD-10-CM diagnosis coding substantiated in the medical record.

Do I have to supply ALL of the requested charts?

Yes, you must supply **all** the requested charts. This request is based on diagnosis data submitted to CMS as a result of services you provided to MA beneficiaries during calendar year (CY) 2014-15.

Do I have to send the complete medical records for each of the requested charts?

No, Highmark is requesting that behavioral health providers only provide chart information that specifically supports and substantiates behavioral health diagnoses and was obtained during a face-to-face encounter with a patient. This type of chart information is most often found in initial visit evaluations and subsequent treatment plans. Highmark is not requesting counseling and therapy session notes.

Who are the record retrieval vendors that are authorized by Highmark to contact us?

Highmark will be working with two vendors and our own internal Highmark Records Retrieval team to retrieve these medical records:

- CiOX Health
- Cotiviti
- Highmark Records Retrieval

You will be contacted by your assigned vendor, most likely via telephone, to verify the retrospective membership list, and then the request and list will be mailed or faxed to you.

What should I anticipate once my practice is contacted?

The assigned vendor will work with you to identify the requested charts and discuss the most efficient methods of submission available to you. This partnership will allow charts to be submitted **within 10 business days**.

What if I am not sure we can meet the requested deadline?

Submissions of all requested charts are expected **within 10 business days**. Highmark vendors make every effort to collaborate with providers to explore options that will allow submission of charts on time.

What if I haven't provided services to patients identified in this review and/or do not have the requested charts?

Please advise your assigned vendor of this during the initial outreach to your office. Since paid claims are used by Highmark to select charts for this retrieval and medical record review, Highmark will work with you to identify any claims submission errors.

Does releasing member charts to the vendor comply with the Health Insurance Portability and Accountability Act (HIPAA)?

Yes. Physicians and practitioners who submit requested medical records to MA Organizations are not in violation of the Health Insurance Portability and Accountability Act (HIPAA) privacy regulations. Accordingly, patient-authorized information releases are not required in order for you to comply with this request for medical records.

General Reference: 45 Code of Federal Regulations (CFR) Part 164, Standards for Privacy of Individually Identifiable Health Information, Final Rule.

Will the reviews take records from our office?

No, the assigned vendors will not take records from your office. The original medical records are your property and will stay in your office. Records may be scanned, copied or downloaded, but only for use by medical coders.

Who do I contact if I have questions?

If your question pertains to the request that you received for charts, please contact your assigned vendor using the contact information below.

- CiOX Health may be reached at **877-445-9293** or chartreview@cioxhealth.com
- Cotiviti may be reached at **877-489-8437**

If you have general questions regarding the Calendar Year (CY) 014-15 OIG Risk Adjustment Data Validation audit contact either your Highmark Provider Relations representative or the Highmark Provider Service Center at 866-588-6967.

Information regarding any law or regulation does not constitute legal or tax advice and is subject to change based upon the issuance of new guidance and/or change in laws or regulations.