

PO Box 83580  
Baton Rouge, LA 70884

[www.amerhealthcaritasla.com](http://www.amerhealthcaritasla.com)



*Corrective Action Plan Submission RE:  
Cash Disbursement Journal and Supplemental Data Files*

October 25, 2013

Prepared For: State of Louisiana

The Department Health and Hospitals

Bayou Health

Prepared By: Rebecca Engelman, Executive Director, AmeriHealth Caritas Louisiana

Melissa Bezet, Director, Compliance and Regulatory Affairs

Eric DeFeo, Director COO Projects

## Table of Contents

Executive Summary:.....	4
Encounters Committees: .....	5
Current Remediation Efforts:.....	5
Automation of reports: .....	5
Quality Assurance Review of reports.....	5
Adjustment Submission Plan .....	7
EDI Technical Assistance Session: Process Document .....	7
Additional Notes Regarding May 6, 2013 Submission of the CDJ.....	7
Next Steps:.....	8
Appendix A: AmeriHealth Caritas Louisiana Process Documentation.....	9
Appendix B: Initial specifications from MSLC .....	9

## **Executive Summary:**

AmeriHealth Caritas Louisiana (previously known as LaCare) recognizes the importance of the Cash Disbursement Journal (CDJ) and the Supplemental Data Files (SPD) and will take all necessary steps required to address and resolve issues impacting the overall CDJ and SPD process and associated reporting in order to comply completely with the Bayou Health contract. Executive Staff is aware of the current situation and is taking proactive steps to ensure that all affected areas are addressed and the best practice is implemented.

As part of the response to the notification “Cash Disbursement Journal (CDJ) and Supplemental Data Files (SPD)”, dated October 18, 2013, AmeriHealth Caritas Louisiana will report progress on all items within this plan to the State of Louisiana Department of Health and Hospitals.

To begin addressing these issues the Plan has taken the following steps:

- Drafted documentation & specifications supporting the CDJ files which will be implemented into a technology driven automated solution assuring higher levels of quality and consistency.
- Drafted documentation & specifications supporting the SPD process & files which will be implemented into a technology driven automated solution assuring higher levels of quality and consistency.
- Drafted a summary plan of adjustments through the upcoming period ending on November 21, 2013. This plan will be submitted to DHH/Molina for approval.
- Drafted a Quality Assurance process for CDJ reporting.
- Formalized revised process workflows.
- Leveraged an established cross functional committee responsible for encounter data quality and completeness to now include monitoring of the CDJ and SPD.

## Encounters Committees:

### **STAKEHOLDERS COMMITTEE**

**Purpose:** This cross functional working stakeholder committee has been created for the purpose of near real-time management of the quality and completeness of the CDJ, SPD and Encounters files.

**Frequency of Meetings:** minimum of two meetings a week throughout remediation activities

## Current Remediation Efforts:

### Automation of reports:

- Plan for automation of reporting functions associated with the reconciliation process:
  - Drafted specification supporting the CDJ files which will be reviewed and approved internally, then communicated to DHH and Myers and Stauffer, LC (MSLC) with a request for review and approval.
  - Drafted specification supporting the SPD files which will be reviewed and approved internally, then communicated to DHH and to MSLC with a request for review and approval.
  - Once the documentation is approved by MSLC , the requirements will be implemented using a formal System Development Life Cycle (SDLC) to include appropriate levels of testing by both technology and business resources.
    - The major milestones of this process to complete in 30 days upon approval will be:
      - Scoping, documentation and approval of requirements and functional system specifications – 1 week
      - Testing and approval to ensure solution meets requirements and specifications – 1 week
      - Release planning and production deployment – 1 week
      - Operational use & post audit of results for change control – 1 week

### Quality Assurance Review of reports

- Drafted a Quality Assurance process for CDJ reports
  - The QA process includes the following steps prior to submission:
    - Confirm receipt of all CDJ Files:

- Review AmeriHealth Caritas Louisiana FFS CDJ file:
  - Confirm transaction dates are only for the month being reported
  - Confirm tab delimiters are correctly inserted
  - Confirm Transaction\_Amount total (excluding REF transactions) is equal to G/L month's activity for Claims Expense Account (excluding Non-Facets Expense).
  - Confirm file name matches convention
- Review Logisticare CDJ file:
- Review VSP CDJ file:
- Review Pharmacy CDJ file:
- The review process for the subcontractors includes:
  - Confirm transaction dates are only for the month being reported
  - Confirm tab delimiters are correctly inserted
  - Confirm file name matches convention
  - Confirm dates and dollar amount fields are formatted correctly
  - Confirm ADJ and VOID transactions contain values for the Orig\_Transaction\_ID, Orig\_Transaction\_Date and Orig\_Check\_Number fields.
- Drafted a Quality Assurance process for SPD reports
  - Confirm receipt of all SPD Files:
    - AmeriHealth Caritas Louisiana FFS
    - Logisticare
    - VSP
    - Pharmacy
    - MTM
  - Review and confirm:
    - Submit Date must be greater than Receive Date and Paid Date
    - Received Date must be greater than Submit Date and greater than or equal to Paid Date
    - Paid Date must be less than or equal to Submit Date and less than or equal to Received Date
    - Paid Date must be equal to Paid Date submitted on Encounter
    - Paid Amount must be equal to amount submitted on Encounter
    - Exclude zero paid transactions
    - Confirm Paid Amount plus Interest Amount must be equal to Total Amount submitted on Encounter
    - Interest Amount is consistently submitted as either at the line level (total of lines = total interest paid) or the summary level (on a single line only)
    - File names match the naming convention

- File contains either all transactions from February 2012 to current reporting month or only the current month transactions

### **Adjustment Submission Plan**

- The 90,000 adjustments identified during the August onsite and cited in the October 18<sup>th</sup> notification have been submitted as of September 19<sup>th</sup>. Adjustments continue to be a focal point for remediation by the Plan going into the November submissions.
- Drafted a plan for submissions of adjustments through the upcoming period ending on November 21, 2013, this plan will be submitted to DHH/Molina for approval.

### **EDI Technical Assistance Session: Process Document**

- The process documentation that was reviewed during the onsite has been revised and is attached for review in Appendix A

### **Additional Notes Regarding May 6, 2013 Submission of the CDJ**

- The Plan agrees with the assessment that the May 6, 2013 CDJ submission was regarded as “error free” and believes that it would remain error free in a stable environment. However, we have continued to receive clarifications from MSLC that have required additional changes both internally and with our subcontractors. Initial specifications for both the CDJ and SDP files have been attached in Appendix B for reference.

## Next Steps:

- Submit Specifications for CDJ and SPD files to DHH & MSLC - No Later than November 1, 2013
- Response and general agreement from DHH & MSLC
- Implementation of process automation - 30 days from approval by DHH and MSLC
- Implement QA process for CDJ and SPD No Later than November 1, 2013
- Communicate revised QA process to subcontractors – No Later than November 1, 2013
- Communicate Encounters Submission Plan to DHH/Molina for approval - No Later than November 1, 2013

## Appendix A: AmeriHealth Caritas Louisiana Process Documentation



LA Process  
Documentation 10252

## Appendix B: Initial specifications from MSLC



MCO  
LC\_CDJ\_Files\_Layout



MCO  
LaCare\_Paid\_Date\_D