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A MEDICARE LEARNING NETWORK® (MLN) EVENT

Part A Providers: QIC Appeals Demonstration Call

Thursday, March 5, 2020

Information for Part A Providers on the Centers for Medicare & Medicaid
Services Qualified Independent Contractor (QIC) Telephone Discussion and
Reopening Process Appeals Demonstration





mln call

A MEDICARE LEARNING NETWORK® (MLN) EVENT

Presenters:

Emily Barnes, Education and Outreach Specialist, C2C Innovative Solutions, Inc.
Kathleen McCracken, Technical Advisor, CMS, Division of Appeals Operations
Lynnsie Kelley, Health Insurance Specialist, CMS, Division of Appeals Operations
Teri White, Health Insurance Specialist, CMS, Division of Appeals Operations



Acronyms in this Presentation

ALJ - Administrative Law Judge

CMS - Centers for Medicare & Medicaid Services

DME - Durable Medical Equipment

HH - Home Health

HHH - Home Health & Hospice

MAC - Medicare Administrative Contractor

OMHA - Office of Medicare Hearings and Appeals

PAE - Part A East

QIC - Qualified Independent Contractor



Agenda

- Medicare Fee-For-Service (FFS) Appeals Process Overview
- Medicare Appeals Demonstration
- Scope of the Part A Appeals Demonstration
- Eligible Jurisdictions
- Demonstration Features
- Telephone Discussion Process
- Benefits to Telephone Discussion Participation
- Frequently Asked Questions
- Reopening Process Benefits
- Reopening Process – Provider Actions
- Education & Outreach
- Questions



Medicare Fee-For-Service (FFS) Appeals Process Overview

- **Level 1:** Redetermination by a Medicare Administrative Contractor (MAC)
- **Level 2: Reconsideration by a Qualified Independent Contractor (QIC)**
- **Level 3:** Decision by the Office of Medicare Hearings and Appeals (OMHA)
- **Level 4:** Review by the Medicare Appeals Council
- **Level 5:** Judicial Review in Federal District Court



Who is C2C Innovative Solutions, Inc. (C2C)

C2C is a Qualified Independent Contractor (QIC) processing second level appeals (reconsiderations) for CMS.

C2C currently is adjudicating Medicare appeals on behalf of CMS for:

- **QIC Part B (North)** - 35 northern states, Washington DC, and three U.S. territories.
- **QIC Part B (South)** - 15 southern states and two U.S. territories.
- **QIC Part A (East)** - 26 eastern states, Washington D.C. and two U.S. territories.

This jurisdiction also includes reconsiderations involving MSP recoveries.



Medicare Appeals Demonstration

January 1, 2016: Centers for Medicare & Medicaid Services (CMS) implemented the Telephone Discussion and Reopening Process Demonstration in the Durable Medical Equipment (DME) QIC Jurisdiction

- The demonstration was originally limited to oxygen and glucose diabetic testing supplies, and MAC Jurisdictions C & D. Now includes all 4 DME MAC Jurisdictions and all claim types (except for diabetic testing strip supplies in JA & JB)

May 1, 2019: Demonstration expanded to include appeals in the Part A East QIC jurisdiction



Medicare Appeals Demonstration

Overall Goal of the Demonstration: Test whether further engagement between suppliers/providers and the QIC, entity responsible for conducting 2nd level appeals, will improve the understanding of the cause of appeal denials, and over time, result in more proper claim submissions at the Medicare Administrative Contractor (MAC) from suppliers/providers participating in the Demonstration; thus improving the efficiency of the Medicare fee-for-service appeals process. This 5 year Demonstration is currently scheduled to end December 31, 2020.

- Evaluation of the Demonstration is being performed by IMPAQ International LLC (IMPAQ)
- Demonstration participants may be contacted by IMPAQ to provide feedback on their experience



Positive Outcomes – DME Demonstration Activities

As of the end of calendar year 2018--

- Supplier Acceptance Rate: 82%
- DME conducted over 134,000 telephone discussions
- 63% of reconsideration decisions issued after a telephone discussion were fully or partially favorable
- DME Demonstration reopening activities have reopened and favorably resolved or assisted suppliers in withdrawing more than 247,000 claims previously pending in the Administrative Law Judge (ALJ) backlog within the Office of Medicare Hearings and Appeals (OMHA)
- We look forward to similar success with the PAE Demonstration



Positive Feedback from Demonstration Participants

“The most helpful part to the demonstration is the reviewer discussing exactly what documentation is being requested or needed. At times the denial can seem a bit confusing (i.e. requesting supporting documentation, but for what?) During the discussions it is obvious the time the reviewers are taking to make sure they are well prepared and are able to discuss the patient in depth.”

“I love the reopening process and hope that it continues. It has been so nice not to have to wait at the ALJ level for a hearing any longer on appeals that C2C was able to reopen.”



Positive Feedback from Demonstration Participants, Cont.

“We have had over a 75% favorable rate since we have begun participating in the phone discussions, this is wonderful!”

“Each C2C Reviewer who I have worked with has been very professional and always ensures to ask if I have any questions. Our company is very pleased with the C2C Telephone Discussion Demonstration and continues to look forward to participating in these discussions.”

“I’m really excited about the chance to actually talk to someone; to finally have a voice. This demonstration is also going to be a great educational opportunity.”



Scope of the Part A Appeals Demonstration

Reconsideration requests received by the Part A East QIC- C2C Innovative Solutions, Inc. (C2C)

Eligible participants are providers who submit Part A claims to the following MACs:

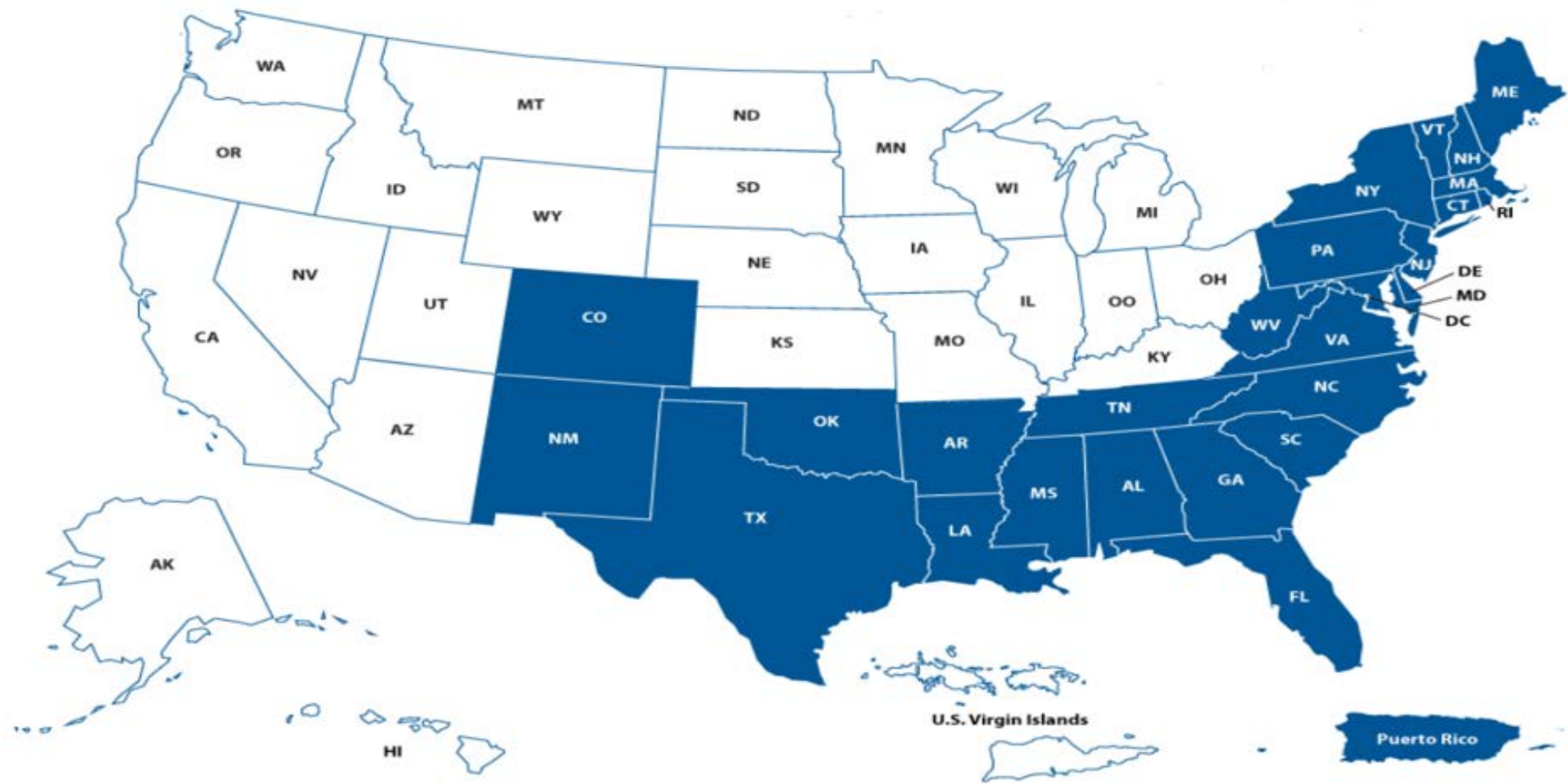
- All Part A appeals: JH, JJ, JK, JL, JM, and JN
- Home health and hospice (HHH) appeals in J6 and J15

Not currently eligible for the Part A Demonstration activities:

- Expedited appeals for service termination
- Appeals that are subject to another CMS initiative



Part A East Jurisdictions



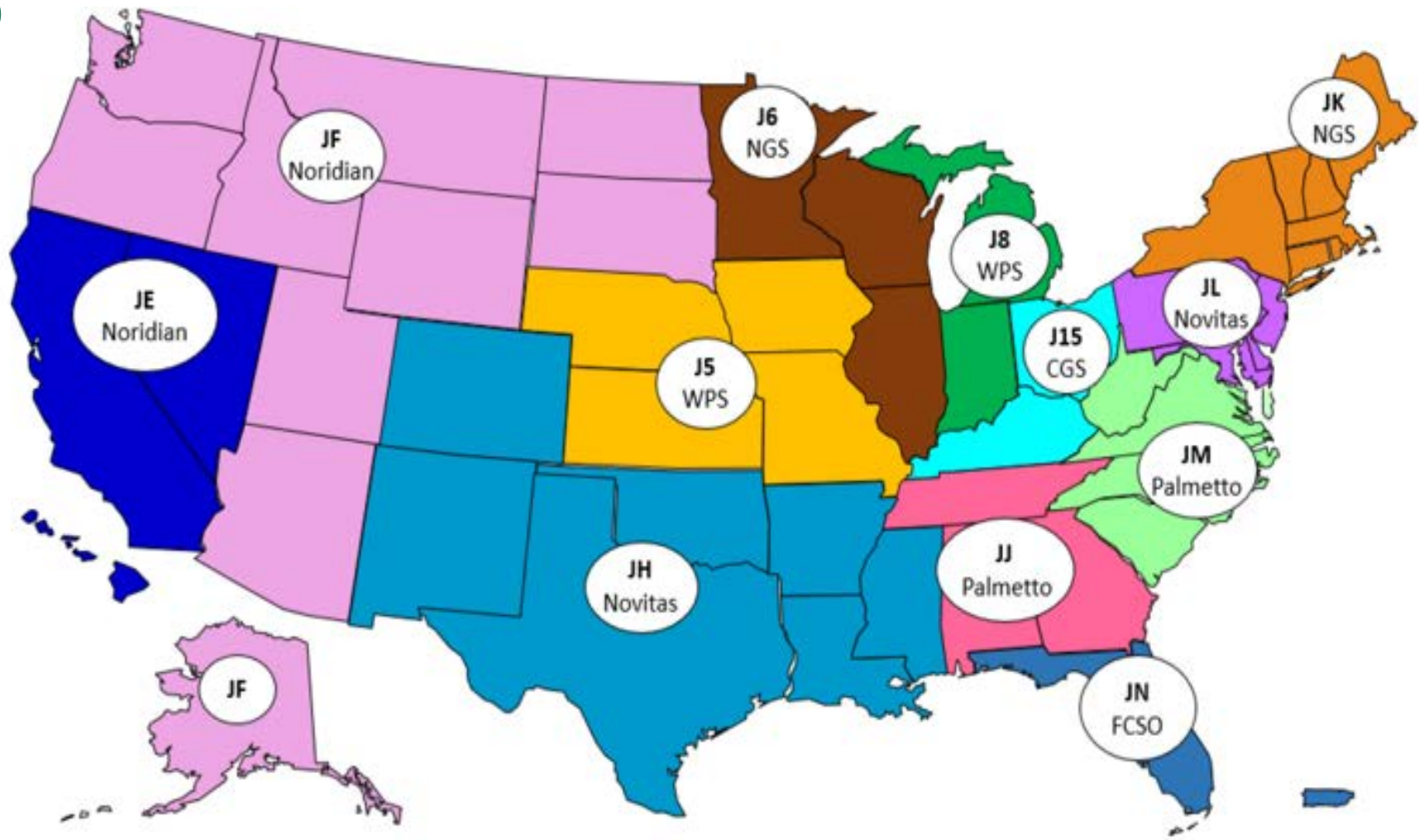
FFS Medicare Part A Appeals Eligible for QIC Demonstration

Novitas - JH	Arkansas, Colorado, Louisiana, Mississippi, New Mexico, Oklahoma, and Texas
Novitas - JL	Delaware, District of Columbia, Maryland, New Jersey, and Pennsylvania
Palmetto - JJ	Alabama, Georgia, and Tennessee
Palmetto - JM	North Carolina, South Carolina, Virginia, and West Virginia
NGS - JK	Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont
First Coast - JN	Florida, Puerto Rico, and U.S. Virgin Islands



A/B MAC Jurisdictions

as of June 2019



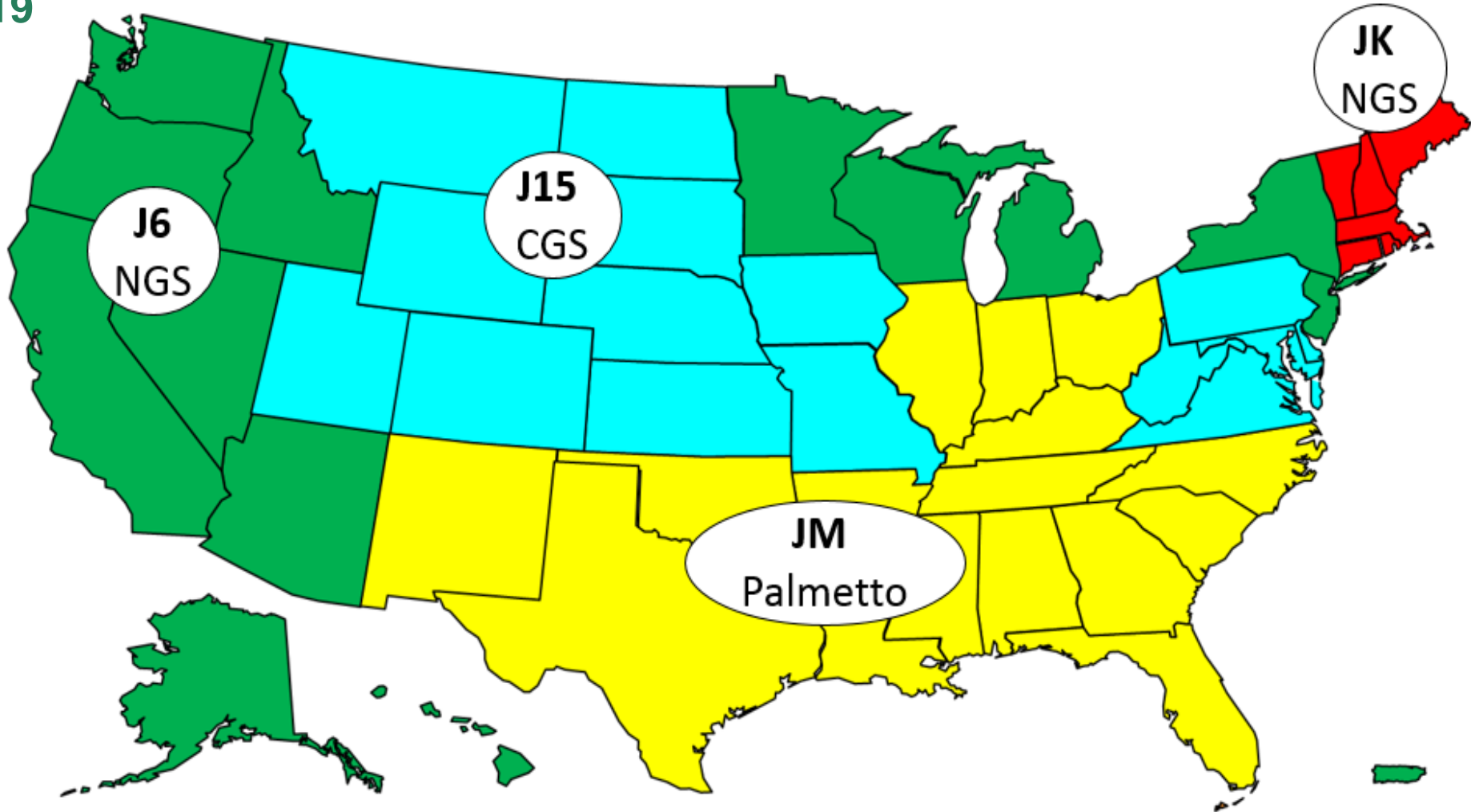
FFS Medicare HHH Appeals Eligible for QIC Demonstration

Palmetto - JM	Alabama, Arkansas, Florida, Georgia, Louisiana, Mississippi, New Mexico, North Carolina, Oklahoma, South Carolina, Tennessee, and Texas
CGS – J15	Colorado, Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, and West Virginia
NGS - JK	Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont
NGS – J6	New Jersey, New York, Puerto Rico, and U.S. Virgin Islands



HH&H MAC Jurisdictions

as of June 2019



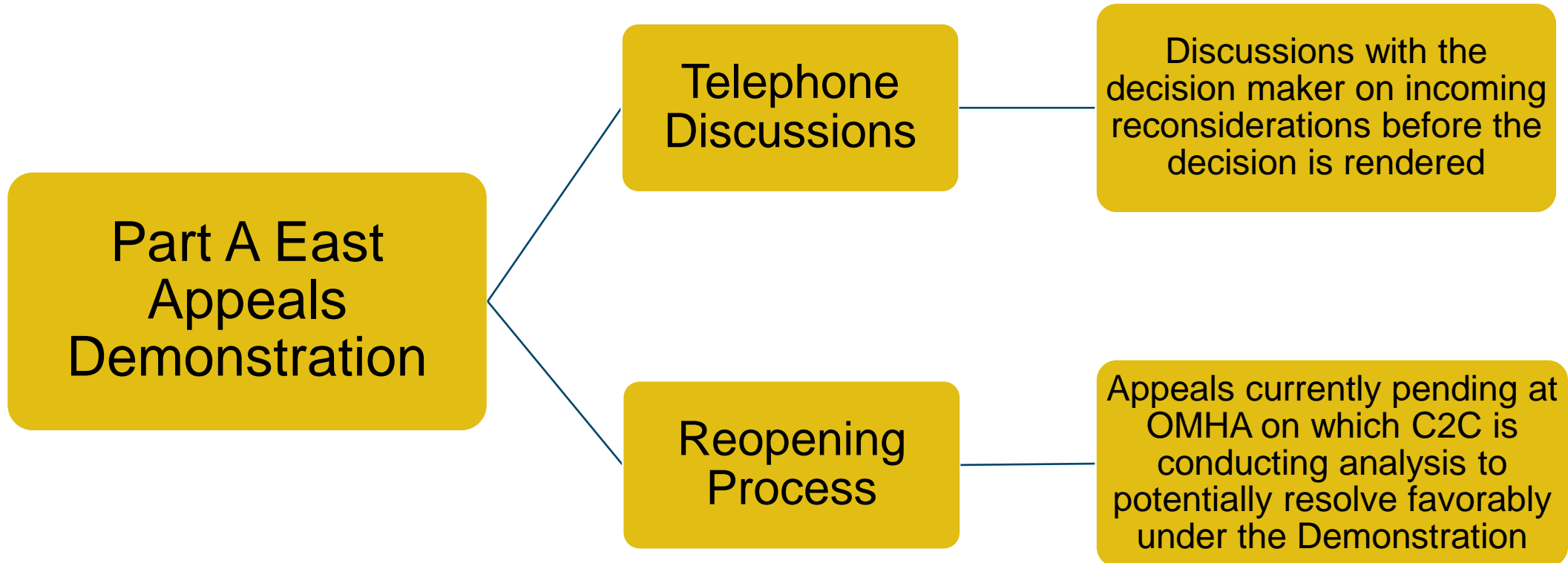
Demonstration Features

Audio recordings and evidence are included in the administrative case file forwarded to OMHA

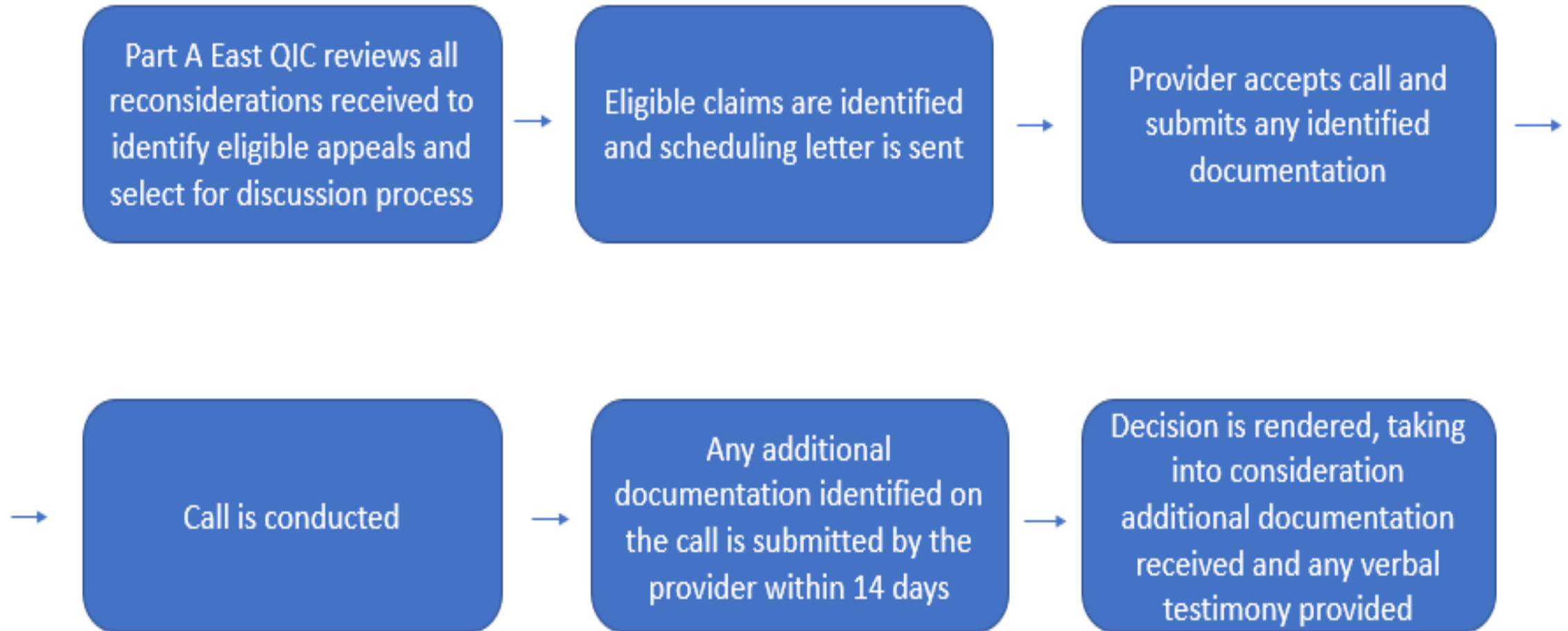
Under the Demonstration, the QIC may conduct reopenings on appeals previously adjudicated by the Part A East QIC which are either currently pending at OMHA, or have not yet been appealed to OMHA. To reopen cases which are pending at OMHA, the QIC will request the case to be remanded.



Two Components of the Demonstration



Telephone Discussion Process



Telephone Discussion Process

Participation in this process is **voluntary**

Agreement to participate in the telephone discussion process allows the QIC **120 days** to process the reconsideration, rather than the existing 60 day standard

Participation in a telephone discussion **does not** impact future appeal rights. You will still have the opportunity to appeal the QIC decision to OMHA

If you utilize a third party to handle submission of your reconsiderations, please reach out to C2C if you are interested in participating in a phone discussion



Benefits of Telephone Discussion Participation

Selected providers who elect to participate in the Demonstration will have the opportunity for direct interaction with the reconsideration decision maker to:

- Engage in a discussion of appealed claims prior to the issuance of a reconsideration decision
- C2C health care professionals have the opportunity to educate providers on complex medical necessity documentation requirements for specific services
- Providers will have an enhanced understanding of Medicare requirements for their medically necessary services, and improve future claim submissions



Benefits of Telephone Discussion Participation, Cont.

Providers have the opportunity to provide verbal testimony and become an active participant in the appeals process

- Prior to the Demonstration, providers had to wait until the Administrative Law Judge (ALJ) hearing to have this same level of participation
- Submit any missing/critical documentation needed to further support a favorable decision prior to the Part A East QIC rendering a decision



Notification and Scheduling Letter

May 09, 2019

PAE PROVIDER
111 SOUTH STREET
JACKSONVILLE, FL 32034

RE: Telephone Discussion Demonstration Notification and Scheduling
Beneficiary: S. Smith
Med ID#: *****00033A
Appellant: PAE Provider

Dear PAE Provider:

This letter is to inform you that the claim(s) under appeal number 1-123456789 has been selected to participate in a voluntary telephone discussion as part of the Medicare Appeals Demonstration. The purpose of this Demonstration is to conduct telephone discussions with providers prior to the Medicare Part A East Qualified Independent Contractor (QIC) decision to ensure that all documentation and testimony related to the reconsideration appeal can be considered prior to rendering the decision.

The benefits of participating in this telephone discussion includes: direct interaction with the decision maker, the ability to provide verbal testimony, the ability to submit missing or critical documentation prior to the QIC decision and to receive feedback that will assist in your understanding of the applicable payment policies going forward. The telephone conversation will be recorded and the recording will be part of the case file.

Should you choose to participate in the Telephone Discussion Demonstration, the QIC decision shall be rendered within 120 days of receipt rather than the existing policy of 60 days. Under this Demonstration, the reconsideration is no longer subject to the 60 day processing requirements and rights to escalation as outlined in section 1869 (c)(3)(C)(i) and (ii) of the Social Security Act.

Medicare Appeal Number:
1-123456789

Contact Information
If you have questions, write or call:

C2C Innovative Solutions, Inc.

QIC PAE
Telephone Discussion Demonstration
P.O. Box 45310
Jacksonville, FL 32231-5310

Telephone:
(904) 224-7371

Fax:
(904) 224-2732

Who we are:
We are a Qualified Independent Contractor (QIC). Medicare has contracted with us to review your file and make an independent decision.

If you agree to participate in this demonstration, please return the completed **Telephone Discussion Demonstration Contact Information Form (attached)** within 14 calendar days from the date of this letter. Instructions on how to return the form are included below.

The recorded Telephone Discussion for the claim(s) under this appeal will be held on:
Jun 20, 2019 from 09:00 am - 09:45 am EST

at which time a Reconsideration Professional from C2C will contact you at the number you have provided on your Telephone Discussion Demonstration Contact Information Form.

Upon a cursory review of the case we have found that the documentation listed below is either missing, or insufficient:

- Lab work including hemoglobin and hematocrit results for dates of service.

Please be prepared to discuss the claim(s), provide verbal testimony, and any additional requested documentation. Please submit the attached **Telephone Discussion Supporting Documentation Cover Letter form** with the supporting documentation, **within 14 calendar days from the date of your Telephone Discussion.**

If you need to reschedule, you may request in writing (accepted via mail/fax) that the call be rescheduled. Please note that rescheduled discussions are granted at the discretion of C2C Innovative Solutions, Inc.

Appeal Details		
Appellant	PAE Provider	
AC	Novitas Solutions, Inc.(12501)	
Redetermination Number	Beneficiary	Date of Service
N/A	*****00033A S. Smith	08/25/80

Sincerely,

Ben Chang,

Medicare Part A East - C2C Innovative Solutions, Inc.
Medicare Contractor

Contact Information Sheet and Cover Page

Telephone Discussion Demonstration Contact Form

Please complete this form with your contact information for the Telephone Discussion. **Return this form by mail/ fax within 14 calendar days of the date noted in the attached letter.**

C2C Innovative Solutions, Inc.
Part A|East Telephone Discussion Demonstration
P.O. Box 45310
Jacksonville, FL 32232
Fax: (904)224-2732

The recorded Telephone Discussion for the claim(s) under this appeal will be held on:
Jun 31, 2019 from 09:00 am - 09:45 am EST

Medicare appeal number:	1-123456789
Supplier/provider/appellant name:	PAE Provider
Contact Person For Discussion:	
Phone Number:	
Fax Number:	
Email Address:	

X

Signature of Representative

Date

Medicare Appeal Number:

1-123456789

Telephone Discussion Supporting Documentation Cover Letter

Please submit this form with the supporting documentation discussed during your Telephone Discussion, **within 14 calendar days from the date of your Telephone Discussion.**

C2C Innovative Solutions, Inc.
Part A East Telephone Discussion Demonstration
P.O. Box 45310
Jacksonville, FL 32232-5310
Fax: (904)224-2732

Please include the following documentation:

- Lab work including hemoglobin and hematocrit results for dates of service.

Frequently Asked Questions



Who can I contact if I want to participate in or have more questions related to the Discussions Process?

To participate in a Telephone Discussion

- You may indicate your interest in participating in a discussion on your reconsideration request that is mailed to C2C

For more information visit:

- www.c2cinc.com

For general comments or questions:

Ademofeedback@c2cinc.com

C2C Innovative Solutions, Inc. - Part A East Appeals Demonstration

- 904-224-7371 (phone)
- 904-224-2732 (fax)



I used a third party to manage my QIC and ALJ appeals. Who can I contact if I want to participate in or have more questions related to the Discussions and Reopening Process?

If you hire a company to submit your appeals to Medicare, but would like to participate in the telephone discussions and/or the reopening process you can:

- Indicate on your reconsideration request that you would like a phone discussion, or include a cover letter to your reconsideration request that indicates you would like a phone discussion;
- Send an email to Ademofeedback@c2cinc.com that includes your NPI;
- Contact our Education & Outreach Specialist (Emily.Barnes@c2cinc.com); or
- Contact C2C at 904-224-7371



What if I have to cancel my telephone discussion?

Please call and leave a message at 904-224-7371. C2C Innovative Solutions, Inc. will contact you regarding your request to reschedule. When leaving a message:

- Please include your name, appeal number and best number to contact you



Where can I fax additional materials for consideration as part of the phone discussion?

Additional materials should be addressed to the following:

QIC PAE – Phone Discussions Fax Line of C2C Innovative Solutions, Inc. at
904-224-2732



What happens if I cannot find and do not submit the documentation requested prior to or during the telephone discussion?

A reconsideration professional will continue to make a determination on your appeal based upon the previously submitted documentation



May I decline to participate in a telephone discussion?

Yes, participation in this demonstration is voluntary. If you receive a notice that your appeal has been selected for participation in this demonstration and you do not wish to participate or do not agree with the 120-day processing timeframe, call and leave a message at 904-224-7371. C2C will cancel your scheduled discussion, and your appeal will continue through the standard reconsideration process. C2C will make every effort to complete the review within 60 days from the day the appeal was received by C2C, but will have up to an additional 14 calendar days. When leaving a message, include your name, appeal number and the best number to contact you should we have any questions.



How long do the phone discussions take?

On average, 20-30 minutes for the first call and 15 minutes for subsequent calls.



Telephone Discussion Findings



Telephone Discussion Findings

Thus far for the Part A Appeals Demonstration (May 2019 – February 2020), the highest MAC denial reasons overturned are:

- Evidence did not support medical necessity
- Covered diagnosis/Covered indication
- Face To Face (FTF) issues (e.g., not related to primary reason for Home Health services or didn't support need for skilled services or homebound status)



Telephone Discussion Findings

Common types of issues resolved through a Phone Discussion

- For inpatient claims that were denied by the MAC due to no covered indication or diagnosis, a phone discussion has been beneficial because C2C could look at the medical record as a whole, and if a covered dx/indication was supported, the provider could submit a corrected UB-04.
- Providers have said that the discussion was very helpful for the provider's understanding of exactly why the case was denied and what specifically was needed to support payment



Telephone Discussion Findings

Common types of issues resolved through a Phone Discussion, Cont.:

- For home health homebound status denials, if C2C was able to find that it was supported in other parts of the record, e.g., medical records other than the face-to-face visit, etc., the reviewer was able to overturn the decision.
- Discussions are helpful because there is clarity on what is needed and why, and the provider may be able to either send in additional records or provide verbal testimony that points out specifics in documentation already submitted



Telephone Discussion Findings

Common types of issues resolved through a Phone Discussion, Cont.:

A specific example was a cataract surgery case that had been denied by the MAC because the records did not support that macular degeneration was ruled out prior to the surgery. The physician participated in the phone discussion and was able to clarify parts of the record which supported coverage. Additional documentation was not required, and the case was found favorable

Phone discussions with the therapist for a therapy case have been helpful because the therapist could point out parts of the record which they felt supported coverage



Telephone Discussion Findings

Overall, C2C reviewers have said there have been many providers who were not clear on specifically why the case was denied, or specifically what additional information/documentation was required. These providers were very glad to finally understand the documentation needed and be able to provide exactly what was missing, or to point out/explain what parts of the record supported payment through a telephone discussion



Reopening Process



Benefits of Reopening Process Participation

C2C will identify missing documentation that may allow your appeal to be favorably resolved

Opportunity for favorable resolution by the Part A East QIC, through the reopenings process, of claims that are currently pending assignment at OMHA

If through the course of the Demonstration activities, the provider determines that they no longer wish to appeal, or find that they do not have the necessary documentation, the Part A East QIC can facilitate withdrawals of any pending appeals at OMHA

Reopenings are currently limited to request for hearing dates of April 1, 2017 to current



Demonstration Reopening Process – Provider Actions

Providers will be notified in writing if an appeal is identified as a potential reopening, along with the missing or insufficient documentation required to allow payment

Providers have **30 days** from the date of the letter to return requested documentation

If the requested documentation is not received, C2C will not proceed with the Reopening

Providers may submit a request for a potential reopening



Reopening Document Request Letter

May 24, 2019

PAE PROVIDER
PO BOX 123
JACKSONVILLE, FL 32034

RE: **Appeal Demonstration Reopening Process Documentation Request**

Dear PAE Provider,

This letter is to inform you that the claim(s) under appeal number 1-123456789 has (have) been selected for potential reopening as part of the Medicare Appeals Demonstration that the Centers for Medicare & Medicaid Services has contracted with C2C Innovative Solutions Inc. (C2C) to perform. As part of this Demonstration, C2C is conducting an analysis of claims previously adjudicated unfavorably by the Qualified Independent Contractor (QIC) that are currently pending at the Office of Medicare Hearings and Appeals (OMHA) and may be resolved favorably by the QIC, should the requested documentation indicated below be provided.

To participate in the reopening process under this Demonstration, please review the enclosed Documentation Cover Letter and return to C2C with the requested documentation. **This cover letter includes a list of the required documents to initiate the reopening process, and require submission within 30 calendar days from the date of this letter.**

Once we receive the requested information, we will carefully review the additional documentation. If we determine a favorable reopening decision can be issued following the documentation review, while the case is currently pending at the OMHA, C2C will work with the OMHA to remand the case back to C2C for processing of the favorable reopening decision. If we are unable to render a favorable decision, your placement at the OMHA will not be affected and we will provide you with written notification regarding why we were unable to proceed with the reopening.

Should a follow up call be requested, a C2C Reconsideration Professional will contact you at the number you have provided.

Sincerely,

QIC Part A East
Medicare Contractor

Medicare Appeal Number:
1-123456789

Contact Information

If you have questions, write or call:

C2C Innovative Solutions, Inc.
QIC PAE Reopening Process Demonstration
P.O. Box 45310
Jacksonville, FL 32232-5310

Telephone:
(904) 224-7349

Fax:
(904) 224-2732

Who we are:
We are a Qualified Independent Contractor (QIC). Medicare has contracted with us to review your file and make an independent decision.

Medicare Appeal Number:
1-123456789

Appeal Details

Appellant	PAE Provider
MAC	CGS 15004

BENEFICIARY: S. SMITH, *****1111A

ICN	Denied Services During		Redetermination Number
	From DOS	To DOS	
12345678900000ABC	August 18, 2013	September 10, 2013	

Documentation Submission Cover Sheet

Medicare Appeal
Number:
1-123456789

Demonstration Reopening Process Documentation Cover Letter

THIS COVER LETTER MUST BE RETURNED AS THE FIRST PAGE OF THE DOCUMENTATION FOR EACH CASE. FAILURE TO DO SO MAY RESULT IN SIGNIFICANT DELAYS DUE TO DIFFICULTIES IN IDENTIFYING THE PROPER CASE.

Please submit this form with the documentation, requested below, within 30 calendar days | of the date noted in the attached letter.

C2C Innovative Solutions, Inc.
QIC PAE – Reopening Process Demonstration
P.O. Box 45310
Jacksonville, FL 32232-5310
Fax: (904)224-2732

In order to reopen the case above, please submit the following documentation:

- Records - Physician

Additional Information: Please submit documentation, such as physician progress notes, from around the time the initial face to face encounter occurred that supports the beneficiary's homebound status. The documentation should indicate that human assistance or an assistive device was required by the beneficiary.

By submitting this form, I agree to participate in the Reopening Process Demonstration as outlined in the Telephone Discussion Demonstration. I understand that the eligible appeals will be remanded from OMHA to be resolved at the QIC level once I have submitted the necessary documentation.

X

Signature of Representative

Date

Demonstration Reopening Process, Cont.

Upon receipt of the requested documentation, C2C will confirm that the documents support a favorable decision

If the documentation supports a favorable decision, upon receipt of the remand from OMHA, C2C will reopen and render favorable decision

If a favorable decision cannot be rendered, the provider will be notified in writing, and the appeal will remain at OMHA and will not lose placement at the ALJ



Demonstration Reopening Process, Cont.

Providing documentation as part of the reopening process **does not** impact your appeal pending OMHA. If your appeal cannot be favorably resolved through the reopening process, your appeal will retain its place in line at OMHA

To support a favorable reopening under the Demonstration, providers **must** supply the Part A East QIC with requested documentation in accordance with the timeframes provided in the reopening documentation request letter from the QIC

If you utilize a third party to handle submission of your reconsiderations, please reach out to C2C if you are interested in participating in the reopening process



Education & Outreach



Education & Outreach

Website

- [C2C website](http://www.c2cinc.com) (www.c2cinc.com)
- Appeals Demonstration Tab (Part A East Appeals Demonstration)
 - Purpose
 - Reopening Process
 - FAQ
 - Newsletter
 - Forms



Education & Outreach, Cont.

Initiatives:

- ACT Calls (Ask the Contractor teleconferences with the MACs)
- Webinars
- Quarterly newsletters
- State association meetings
- MAC education workshops
- National conferences



Question & Answer Session



Resources

- C2C website: www.c2cinc.com
- Submit questions to C2C: ADemoFeedback@c2cinc.com
- Emily Barnes: Emily.Barnes@c2cinc.com
- CMS website: <https://www.cms.gov/Medicare/Appeals-and-Grievances/OrgMedFFSAppeals/index.html>
- Submit questions to CMS: MedicareFFSAppeals@cms.hhs.gov with "Appeals Demonstration" in the subject line



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