Special Needs Plans Care Coordination (SNPCC)
August 26, 2021

Matthew Guerand
Division of Audit Operations, Medicare Parts C & D Oversight & Enforcement Group, CMS
SNPCC Program Audit Protocol

Overview

• Program Audit Protocol
  – Audit Elements Tested
  – Method of Evaluation

• Program Audit Data Request
  – Review Technical Specifications
• Specifications and tools are for auditing/monitoring activities, not interpreting policy
• Not all data points are used to determine compliance
SNPCC Audit Elements Tested

• Care Coordination
  – Implementation of Model of Care (MOC)
  – 13 compliance standards
• 10 samples from Special Needs Plans Enrollees (SNPE) Record Layout – not specific to certain case type
• Confirm data submitted within universe
• Initial Health Risk Assessments (IHRA) conducted within 90 days of effective date
  – IHRA may occur before or after effective date
  – Includes enrollees continuously enrolled for 90 days with effective dates within 12 months of audit engagement letter

• Request Table2IA: HRA Timeliness Impact Analysis
  – Include enrollees who did not have IHRA
  – Used to quantify outreach attempts to enrollees to conduct IHRA
Care Coordination
Compliance Standard 1.2

• Conducted timely Annual Health Risk Assessments (AHRA)
  – 365 days of previous HRA
  – 365 of date of enrollment (if no IHRA conducted)

• Request Table2IA: HRA Timeliness Impact Analysis
  – Include enrollees who had untimely AHRA
  – Used to quantify outreach attempts to enrollees to conduct AHRA
• Select 30 Samples from Table 1
  – Reflect general composition of membership in each plan type (D-SNP, C-SNP, or I-SNP)
  – Remaining samples selected from plan type with greatest representation in the universe

• Completed HRA included comprehensive initial assessment and reassessment specific to needs of enrollees
  – Medical, psychological, cognitive, functional, mental health
• Determine if SO completed an individualized care plan (ICP)
  – Addresses needs identified in the HRA
  – Includes measurable outcomes

• ICP includes enrollee’s:
  – Self-management goals and objectives
  – Healthcare preferences
  – Description of services tailored to enrollee’s needs
  – Identification of goals (met or not met)
Care Coordination
Compliance Standard 1.5

• Determine whether ICPs were reviewed and/or modified reflecting changes to enrollee’s healthcare needs according to the transition of care policy in the model of care (MOC)
• Determine whether Sponsor implemented the ICP
  – Case Management Notes
  – Interdisciplinary Care Team Documentation
  – Claims Data (inpatient and outpatient)
  – Prescription Drug Event (PDE) Records
• Determine how enrollee or caregiver/representative was involved in the ICP development
Care Coordination
Compliance Standard 1.8

• Determine whether SO coordinated communication amongst its personnel, provider, and enrollees
Care Coordination
Compliance Standard 1.9

• Enrollee’s care managed by an interdisciplinary care team (ICT) comprised of appropriate clinical disciplines according to the SNP’s MOC

• Enrollee’s primary care provider involved in coordination of care and communications
• Determine whether SO developed and implemented care transition protocols to maintain continuity of care as defined in the MOC
• Determine whether the ICPs were developed and implemented by staff that met the professional requirements, including credentials, described in the MOC
• Determine whether each member of the enrollee’s ICT received training on the MOC
• Determine whether network providers caring for each of the enrollees received training on the MOC
  – Review documentation supporting that outreach was conducted/training materials provided to network provider in accordance with the MOC
Program Audit Data Request
Special Needs Plans Enrollees (SNPE) Record Layout Instructions

- Must include all current SNP enrollees on the date of engagement letter
- Each enrollee must only be listed once
- Include enrollees who are disenrolling at the end of the month of engagement letter
- Exclude enrollees whose effective enrollment date is first of month following the date of engagement letter
### Enrollment Effective Date

<table>
<thead>
<tr>
<th>ENROLLMENT EFFECTIVE DATE</th>
<th>MOST RECENT PLAN CHANGE EFFECTIVE DATE</th>
<th>DATE OF MOST RECENT HRA</th>
<th>DATE OF PREVIOUS HRA</th>
</tr>
</thead>
</table>
| • Date of most current/ continuous enrollment | • Date of last plan change within organization  
  ○ Use post-event effective date for enrollee  
  • Enter None if there were no PBP or plan consolidation events | • Date of enrollee’s most recently completed HRA  
  • No HRA completed: enter None  
  ○ Includes enrollee refusal, unable to contact, failure to complete HRA  
  • Only IHRA completed: enter date IHRA completed | • Date of enrollee’s previously completed HRA  
  ○ Date of HRA that preceded the most recent HRA  
  • No HRA completed: enter None  
  ○ Includes enrollee refusal, unable to contact, failure to complete HRA |
**Field Descriptions – Most Recent Plan Change Effective Date**

<table>
<thead>
<tr>
<th>ENROLLMENT EFFECTIVE DATE</th>
<th>MOST RECENT PLAN CHANGE EFFECTIVE DATE</th>
<th>DATE OF MOST RECENT HRA</th>
<th>DATE OF PREVIOUS HRA</th>
</tr>
</thead>
</table>
| Date of most current/ continuous enrollment | Date of last plan change within organization  
  - Use post-event effective date for enrollee  
  - Enter None if there were no PBP or plan consolidation events | Date of enrollee’s most recently completed HRA  
  - No HRA completed: enter None  
  - Includes enrollee refusal, unable to contact, failure to complete HRA  
  - Only IHRA completed: enter date IHRA completed | Date of enrollee’s previously completed HRA  
  - Date of HRA that preceded the most recent HRA  
  - No HRA completed: enter None  
  - Includes enrollee refusal, unable to contact, failure to complete HRA |
### Field Descriptions – Date of Most Recent HRA

<table>
<thead>
<tr>
<th>ENROLLMENT EFFECTIVE DATE</th>
<th>MOST RECENT PLAN CHANGE EFFECTIVE DATE</th>
<th>DATE OF MOST RECENT HRA</th>
<th>DATE OF PREVIOUS HRA</th>
</tr>
</thead>
</table>
| • Date of most current/ continuous enrollment | • Date of last plan change within organization  
○ Use post-event effective date for enrollee  
• Enter None if there were no PBP or plan consolidation events | • Date of enrollee’s most recently completed HRA  
• No HRA completed: enter **None**  
○ Includes enrollee refusal, unable to contact, failure to complete HRA  
• Only IHRA completed: enter **date IHRA completed** | • Date of enrollee’s previously completed HRA  
○ Date of HRA that preceded the most recent HRA  
• No HRA completed: enter **None**  
○ Includes enrollee refusal, unable to contact, failure to complete HRA |
<table>
<thead>
<tr>
<th>Field Description</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ENROLLMENT EFFECTIVE DATE</td>
<td>Date of most current/continuous enrollment</td>
</tr>
<tr>
<td>MOST RECENT PLAN CHANGE EFFECTIVE DATE</td>
<td>Date of last plan change within organization  ○ Use post-event effective date for enrollee  ● Enter None if there were no PBP or plan consolidation events</td>
</tr>
<tr>
<td>DATE OF MOST RECENT HRA</td>
<td>Date of enrollee’s most recently completed HRA  ○ No HRA completed: enter None  ○ Includes enrollee refusal, unable to contact, failure to complete HRA  ● Only IHRA completed: enter date IHRA completed</td>
</tr>
<tr>
<td>DATE OF PREVIOUS HRA</td>
<td>Date of enrollee’s previously completed HRA  ○ Date of HRA that preceded the most recent HRA (Column ID I)  ● No HRA completed: enter None  ○ Includes enrollee refusal, unable to contact, failure to complete HRA</td>
</tr>
</tbody>
</table>
### Field Descriptions – Date Initial HRA was Completed

<table>
<thead>
<tr>
<th>Date Initial HRA Was Completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Date of enrollee’s first HRA</td>
</tr>
<tr>
<td>• Date completed HRA is returned to SNP</td>
</tr>
<tr>
<td>• IHRA not complete: enter <strong>None</strong></td>
</tr>
<tr>
<td>• IHRA date more than 10 years prior to engagement letter date: enter <strong>EXC-10</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Enrollee Risk Stratification Level at Time of Audit Engagement Letter</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Enrollee risk level at time of engagement letter</td>
</tr>
<tr>
<td>• No risk stratification level has been assigned enter: <strong>None</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date of Most Recent Individualized Care Plan (ICP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Date of most recent ICP</td>
</tr>
<tr>
<td>• Continuous ICPs: enter <strong>date of most recent update</strong></td>
</tr>
<tr>
<td>• No care plan developed enter: <strong>None</strong></td>
</tr>
</tbody>
</table>
### Field Descriptions – Enrollee Risk Stratification Level at time of Audit Engagement Letter

<table>
<thead>
<tr>
<th>DATE INITIAL HRA WAS COMPLETED</th>
<th>ENROLLEE RISK STRATIFICATION LEVEL AT TIME OF AUDIT ENGAGEMENT LETTER</th>
<th>DATE OF MOST RECENT INDIVIDUALIZED CARE PLAN (ICP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Date of enrollee’s first HRA</td>
<td>• Enrollee risk level at time of engagement letter</td>
<td>• Date of most recent ICP</td>
</tr>
<tr>
<td>• Date completed HRA is returned to SNP</td>
<td>• No risk stratification level has been assigned enter: None</td>
<td>• Continuous ICPs: enter date of most recent update</td>
</tr>
<tr>
<td>• IHRA not complete: enter None</td>
<td></td>
<td>• No care plan developed enter: None</td>
</tr>
<tr>
<td>• IHRA date more than 10 years prior to engagement letter date: enter EXC-10</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Field Descriptions – Date of Most Recent Individualized Care Plan (ICP)**

<table>
<thead>
<tr>
<th>DATE INITIAL HRA WAS COMPLETED</th>
<th>ENROLLEE RISK STRATIFICATION LEVEL AT TIME OF AUDIT ENGAGEMENT LETTER</th>
<th>DATE OF MOST RECENT INDIVIDUALIZED CARE PLAN (ICP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Date of enrollee’s first HRA</td>
<td>• Enrollee risk level at time of engagement letter</td>
<td>• Date of most recent ICP</td>
</tr>
<tr>
<td>• Date completed HRA is returned to SNP</td>
<td>• No risk stratification level has been assigned enter: None</td>
<td>• Continuous ICPs: enter date of most recent update</td>
</tr>
<tr>
<td>• IHRA not complete: enter None</td>
<td></td>
<td>• No care plan developed enter: None</td>
</tr>
<tr>
<td>• IHRA date more than 10 years prior to engagement letter date: enter EXC-10</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Care Coordination Impact Analysis (CC-IA) Record Layout</strong></td>
<td><strong>HRA Timeliness Impact Analysis (HRAT-IA) Record Layout</strong></td>
<td></td>
</tr>
<tr>
<td>-----------------------------------------------------------</td>
<td>----------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>Table 1IA</strong></td>
<td><strong>Table 2IA</strong></td>
<td></td>
</tr>
<tr>
<td>• Used to quantify noncompliance</td>
<td>• Used to mitigate noncompliance</td>
<td></td>
</tr>
<tr>
<td>• Populated with enrollees impacted in the 26-week period preceding engagement letter through the date the issue was identified on audit</td>
<td>• Populate with enrollees who did not receive a timely IHRA or AHRA within the 12-month period prior to the date of engagement letter</td>
<td></td>
</tr>
</tbody>
</table>
SNPCC Supplemental Questionnaire

- Assists CMS in understanding the SNPs operations
- Separate questionnaires for each entity/operating system
- Due 5 business days after engagement letter is issued
Questions?

- Questions related to the program audit process can be sent to the program audit mailbox at part_c_part_d_audit@cms.hhs.gov.