

Millennium Collaborative Care, PPS

DSRIP Year 3, Quarter 2

APPEAL

Millennium Collaborative Care PPS submitted an appeal requesting that the Independent Assessor (IA) reconsider its determination for Project 2.b.iii, Milestone 2. Project 3.a.i, Milestone 1, and Project 3.a.i Milestone 3.

Independent Assessor's Initial Determination

Required Documentation

Project 2.b.iii, Milestone 2 required the PPS to submit documentation to support that participating EDs will establish partnerships to community primary care providers with an emphasis on those that are PCMHs and have open access scheduling. Of all the data sources for Metric 1, which is the issue at hand, the PPS submitted a list of participating NCQA-certified and/or APC-approved physicians/practitioners (APC Model requirements as determined by NY SHIP). The IA sampled this list and found the PPS' response to the request to insufficiently address each item.

Project 3.a.i, Milestone 1 required the PPS to submit documentation to support co-location of behavioral health services at primary care practice sites. All eligible participating primary care practices must meet 2014 NCQA level 3 PCMH or Advance Primary Care Model standards by DY 3. Of all the data sources for Metric 1, which is the issue at hand, the PPS submitted a list of participating NCQA-certified and/or APC-approved physicians/practitioners (APC Model requirements as determined by NY SHIP). The IA sampled this list and found the PPS' response to the request to insufficiently address each item.

Project 3.a.i, Milestone 3 required the PPS to submit documentation to evidence that partners conducted preventive care screenings, including behavioral health screenings (PHQ-2 or 9 for those screening positive, SBIRT) implemented for all patients to identify unmet needs. Of all the data sources for Metric 3, which is the issue at hand, the PPS submitted a list/inventory providing the roster of identified patients and the number of screenings completed at the established project sites. The IA sampled this list and found the PPS' response to the request to insufficiently address each item.

Initial IA Determination:

Project 2.b.iii, Milestone 2- Fail
Project 3.a.i, Milestone 1- Fail
Project 3.a.i, Milestone 3- Fail

Rationale for Initial IA Determination

Project 2.b.iii, Milestone 2

The IA did not consider this milestone complete. While documentation is sufficient for 18 of the 29 sampled items, PPS did not evidence to validate certification for 6 practitioners. In addition, PPS noted

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that 5 practitioners work for Planned Parenthood which does not NCQA certification. As a result, the PPS failed to meet the milestone requirements.

Project 3.a.i, Milestone 1

The IA did not consider this milestone complete. While documentation is sufficient for 14 of the 29 sampled items, PPS did not evidence certification for 14 practitioners. In addition, PPS noted that 1 practitioner works for Planned Parenthood which does not NCQA certification. As a result, the PPS failed to meet the milestone requirements.

Project 3.a.i, Milestone 3

The IA did not consider this milestone complete. The PPS failed to respond or provide documentation for 5 sample items requested. As a result, the PPS failed to meet the milestone requirements.

Millennium PPS Appeal

Millennium PPS subsequently filed a formal appeal to the IA's initial determination.

"Omission of physicians from NCQA website: Millennium took the approach of providing site specific NCQA PCMH recognition status in lieu of individual practitioner status, as it aligns with our contractual relationships with our primary care partners and the submission process of PCMH by location."

Millennium went on to explain the issue with Planned Parenthood:

"Millennium confirmed that the Planned Parenthood chapters within the Millennium PPS do not offer comprehensive primary care and are ineligible for Patient Centered Medical Home Recognition according to NCQA."

Finally, Millennium explains the issue in Project 3.a.i, Milestone 3:

"The sample request for this milestone listed 60 patients for whom we needed to provide proof of screening. Most of this was in the form of EMR screenshots. In the request from the IA, this patient list broke across two pages, with 55 patients on one page and 5 on the other. We collected documentation for all 60 patients in November when the request was received. However, when we compiled all the documentation into one file to facilitate easy review by the IA, we inadvertently omitted the five patients from the second page of the request. As soon as we learned of this omission on January 4, 2018, we uploaded the remaining five patients' documentation to the Secure File Transfer platform."

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Independent Assessor's Final Determination

Final IA Determination after Appeal

Upon further review and validation by the IA, the Millennium PPS will be receiving an upheld status of **Fail** for each of the milestones appealed.

Rationale for Final IA Determination

The IA accepts the PPS' clarification, however the PPS failed to sufficiently address how the information submitted prior to remediation meets the milestone requirements or the sample request. It is the IA audit policy that new information cannot be accepted after adjudication or during an appellate request and cannot be used to change an original determination. The original determination is upheld for all appealed milestones.