

DEPARTMENT OF HEALTH AND HUMAN SERVICES
OFFICE OF DIRECTOR

ACTION REFERRAL

TO <i>SB - Glick</i>	DATE <i>8/6/07</i>
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DIRECTOR'S USE ONLY		ACTION REQUESTED	
1. LOG NUMBER 000068	<input checked="" type="checkbox"/> Prepare reply for the Director's signature DATE DUE 9-4-07	<input type="checkbox"/> Prepare reply for appropriate signature DATE DUE _____ <input type="checkbox"/> FOIA DATE DUE _____ <input type="checkbox"/> Necessary Action	
2. DATE SIGNED BY DIRECTOR <i>C: Forkner Singleton</i>			
<i>Approved 9/11/07, letter</i>			

APPROVALS (Only when prepared for director's signature)	APPROVE	* DISAPPROVE (Note reason for disapproval and return to preparer.)	COMMENT
1.			* Survey to follow in 2 weeks
2.			
3.			
4.			



DEPARTMENT OF HEALTH & HUMAN SERVICES

OFFICE OF INSPECTOR GENERAL

Office of Evaluation and Inspections

Room 2225
John F. Kennedy Federal Building
Boston, MA 02203
(617) 565-1050

August 2, 2007

Mr. Robert Kerr
Director

Department of Health & Human Services
P.O. Box 8206
Columbia, SC 29202-8206

RECEIVED

AUG 06 2007

Department of Health & Human Services
OFFICE OF THE DIRECTOR

Dear Mr. Kerr:

The Office of Inspector General is conducting a national study on external quality review organizations (EQRO) in Medicaid managed care. We are evaluating whether EQROs are providing States with Federally required information and how States are utilizing this information. As part of our data collection, we will survey all States that arrange for external quality reviews in accordance with 42 CFR § 438.358. This study is neither an audit nor an investigation of your State's Medicaid Agency. Rather, it focuses on promoting economy, efficiency, and effectiveness in the external quality review program.

In about 2 weeks we will be sending you a survey regarding your State's experience with the external quality review process. We will also enclose the following information request along with detailed instructions:

- A copy of the contract between your State and its EQRO
- The complete Unison EQRO report from 2005

The authority for this study is found in the Inspector General Act (5 U.S.C. App) at §§ 2, 4, and 6 of the Act, which authorize the Inspector General to conduct inquiries and make recommendations relating to the economy, efficiency, and effectiveness of programs administered or funded by the Department of Health and Human Services.

If you have questions regarding this study upcoming request please contact Ivan Troy at (617) 565 - 1056 or Ivan.Troy@oig.hhs.gov. Thank you for your cooperation.

Sincerely,

Joyce M. Greenleaf
Regional Inspector General for Evaluation and Inspections



DEPARTMENT OF HEALTH & HUMAN SERVICES

OFFICE OF INSPECTOR GENERAL

cc: Ms. Fortner

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Attack Survey
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About 2 weeks ago we sent you a letter stating that the OIG would be sending a survey and document request to your State Medicaid agency. Enclosed you will find the survey and instructions regarding our document request. The survey seeks information about your State's oversight of its EQRO, its use of the EQRO report information, and the general experience of your State's Medicaid agency with the external quality review. We have also enclosed a list of the requested documents and the person(s) we've identified in your agency with the subject expertise to complete this request.

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Please send the completed survey and copies of the requested documents to our office by September 14th.

If you have any questions regarding the survey or the study, please contact Ivan Troy at (617) 565 1056 or Ivan.Troy@oig.hhs.gov. Thank you for your cooperation.

Sincerely,

Joyce M. Greenleaf

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Regional Inspector General for Evaluation and Inspections

enclosure

Office of Inspector General Document Request

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1. The contract between your State and its EQRO that covers the year(s) 2005, including the scope of work and performance incentive/management plans
2. The Unison EQRO report from 2005 including all sections

We have identified the following person(s) in your agency who may have the subject expertise to complete the survey:

- Ms. Regina Young
Quality
Department of Health and Human Services

We have also identified the following person in your agency as having the subject expertise to complete the document request for your State's EQRO contract:

- Mr. Larry Fernandez
Contracts
Department of Health and Human Services

Please send all materials by September 14th. Send copies of the documents, not originals. Electronic documents may be submitted to the email address below, or send hard copies using the enclosed, preaddressed FedEx label.

If you have any questions regarding this request please contact Ivan Troy at (617) 565-1056 or Ivan.Troy@oig.hhs.gov. Thank you for your cooperation.

THANK YOU!

This completes the survey. Thank you for taking the time to respond to this survey. Please mail the completed survey by **September 14, 2007** to:

Ivan Troy
DHHS/OIG/OEI
JFK Federal Building, Room. 2225
15 New Sudbury Street
Boston, MA 02203

or fax it to (617) 565-3751 Attention: Ivan Troy

Also, if you have not done so already, please submit the requested documents as outlined in the "Office of Inspector General Document Request."



INSTRUCTIONS FOR THE OIG SURVEY FOR THE SOUTH CAROLINA MEDICAID AGENCY

The Office of Inspector General is conducting this survey as part of a national study on the external quality review process in Medicaid managed care.

This survey has four sections that ask about your State's experience with the following:

- Oversight of External Quality Review Organizations (EQRO)
- Use of the EQRO annual reports
- Conduct of the five optional review activities
- General experience with the external quality review process

If you need additional space for any of your answers, please use extra paper. Please include the number of the question you are answering.

WHEN IS THE DEADLINE FOR COMPLETING THE SURVEY?

Please return survey by **Friday, September 14, 2007.**

WHO SHOULD COMPLETE THE SURVEY?

We have identified the following person at the State agency who may have the subject expertise necessary to complete the survey:

Ms. Regina Young, Quality
Department of Health and Human Services

WHO TO CONTACT WITH QUESTIONS?

If you have questions about this survey, please contact:
Ivan Troy at (617) 565-1056 or ivan.troy@oig.hhs.gov or
Rose Lichtenstein at (617) 565-2911 or rose.lichtenstein@oig.hhs.gov

WHERE TO SEND COMPLETED SURVEYS?

Fax: (617) 565-3751 Attention: Ivan Troy

Mail:
Ivan Troy
DHHS/OIG/OEI
JFK Federal Bldg., Rm. 2225
15 New Sudbury Street
Boston, MA 02203

Contact Information for Survey Respondent

State: South Carolina

Name of person completing this survey: _____

Title: _____

Telephone number: _____

E-mail address: _____

Questions 1 - 12 concern how your State Medicaid agency oversees the EQRO.

1. Which EQRO does your State currently contract with to conduct external quality reviews?

2. How many Medicaid managed care entities does your State currently contract with?

3. Since 2003, for how many external review cycles has your EQRO furnished reports to your State?

4. What were the start and end dates of the most recent period the EQRO reviewed?

5. Does your State require its EQRO to submit interim reports during each external quality review period (not including the EQRO's annual report)?

☐ No → skip to question 7

☐ Yes

→ 6. If yes, how often does your State Medicaid agency require the EQRO to submit these interim reports?

☐ Monthly

☐ Quarterly

☐ Ad hoc basis

☐ Other (please explain) _____

7. During the last external quality review period, did your State regularly communicate with its EQRO?
☐ No —→ skip to question 10
☐ Yes

8. About how frequently did your State Medicaid agency communicate with the EQRO during the last external quality review period?

- ☐ Weekly
☐ Monthly
☐ Quarterly
☐ Annually
☐ Other (please explain) _____

9. By which of the following means did your State Medicaid agency communicate with its EQRO?

<i>check one box for each item</i>		Used	Did not use
In-person meetings		<input type="checkbox"/>	<input type="checkbox"/>
Telephone / conference calls		<input type="checkbox"/>	<input type="checkbox"/>
E-mail		<input type="checkbox"/>	<input type="checkbox"/>
Other (please indicate below)		<input type="checkbox"/>	<input type="checkbox"/>

10. Does your State's EQRO use CMS's external quality review protocols?

- ☐ Yes, for all external quality review activities—→ skip to question 13
☐ Yes, for some external quality review activities
☐ No

11. If your EQRO does not use CMS's protocols for all external quality review activities, who developed the protocols it does use?

12. In accordance with 42 CFR § 438.350(e), how does your State Medicaid agency ensure these protocols are consistent with CMS's? If possible, please submit supporting documentation.

Questions 13 - 25 refer to your State Medicaid Agency's use of information furnished by the External Quality Review Organizations in accordance with 42 CFR § 438.364.

13. During the past 3 years, has your State Medicaid agency made changes in how it administers its Medicaid managed care program, based on EQRO recommendations directed to the State?

☐ No → skip to question 16

☐ Yes

14. If yes, which of the following changes has your State Medicaid agency made?

<i>check one box for each item</i>		Made the change	Did not make the change
State contracts with managed care entities			
Terminated the contract between the State and managed care entities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Extended or renewed the contract between the State and managed care entities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Inserted new provisions into the contract between the State and managed care entities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Setting standards for performance measures			
Raised minimum standards for performance measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lowered minimum standards for performance measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Created minimum standards for performance measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fostering knowledge-sharing across managed care entities			
Facilitated sharing of best practices among managed care entities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provided technical assistance to managed care entities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other changes (please explain below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- How many times your agency took the action; and
- For each time your agency took the action, how many managed care entities were involved

[illegible]

16. During the past 3 years, has your State Medicaid agency required managed care entities to make changes, based on EQRO recommendations directed to the entities?

- ☐ No → skip to question 21
☐ Yes

17. If yes, which of the following changes has your State Medicaid agency required the managed care entities to make?

<i>check one box for each item</i>		Changed	Did not change
Performance improvement projects			
How the entity conducts performance improvement projects	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How the entity documents performance improvement projects	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Performance measures			
How the entity calculates performance measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How the entity reports performance measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance with standards			
How the entity complies with standards regarding enrollee rights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How the entity complies with standards regarding grievances and appeals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How the entity complies with standards regarding access to care	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
How the entity complies with other standards (please list standards) _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Information technology			
Improving the entity's information systems	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please explain below)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- How many managed care entities were involved
- How often your agency required each entity to make the change

If you need more writing space, please use a separate piece of paper (note the question number to which you are responding on the paper). If possible, submit supporting documentation with your survey.

- How many managed care entities were involved
- How often your agency required each entity to make the change

If you need more writing space, please use a separate piece of paper (note the question number to which you are responding on the paper). If possible, submit supporting documentation with your survey.

[illegible]

19. Does your State Medicaid agency use specific oversight mechanisms to ensure that the managed care entities take these State-required actions? If possible, please submit supporting documentation with your survey.

- ☐ No → skip to question 21
☐ Yes

20. Which oversight mechanisms does your State use to ensure that the managed care entities take these State-required actions?

<i>check one box for each item</i>		Uses	Does not use
Through provisions in the State/managed care entity contract		<input type="checkbox"/>	<input type="checkbox"/>
State delegates oversight to EQRO		<input type="checkbox"/>	<input type="checkbox"/>
Other (please explain) _____		<input type="checkbox"/>	<input type="checkbox"/>

21. To your knowledge, did any of your State's managed care entities make changes, based on EQRO recommendations, that were not required by your State Medicaid agency?

- ☐ No → skip to question 23
☐ Yes

22. Please provide details on the changes the entities took.

23. What barriers has your State Medicaid agency encountered in attempting to utilize data from the EQRO report?

<i>check one box for each item</i>	Barrier	Not a barrier
EQRO report findings are too general	<input type="checkbox"/>	<input type="checkbox"/>
EQRO report findings are too specific	<input type="checkbox"/>	<input type="checkbox"/>
EQRO report findings are not relevant to State's interest	<input type="checkbox"/>	<input type="checkbox"/>
EQRO report recommendations are too general	<input type="checkbox"/>	<input type="checkbox"/>
EQRO report recommendations are too specific	<input type="checkbox"/>	<input type="checkbox"/>
EQRO report recommendations are not actionable	<input type="checkbox"/>	<input type="checkbox"/>
Lack of timeliness of EQRO report data	<input type="checkbox"/>	<input type="checkbox"/>
EQRO report not clearly written	<input type="checkbox"/>	<input type="checkbox"/>
State Medicaid agency budget limits	<input type="checkbox"/>	<input type="checkbox"/>
Limitations of State contracts with managed care entities	<input type="checkbox"/>	<input type="checkbox"/>
State Medicaid agency staff training	<input type="checkbox"/>	<input type="checkbox"/>
EQRO staff training	<input type="checkbox"/>	<input type="checkbox"/>
Managed care entity staff training	<input type="checkbox"/>	<input type="checkbox"/>
State Medicaid agency staff turnover	<input type="checkbox"/>	<input type="checkbox"/>
Managed care entity staff turnover	<input type="checkbox"/>	<input type="checkbox"/>
Other (please explain) _____	<input type="checkbox"/>	<input type="checkbox"/>

24. Overall, how useful is the content of the EQRO annual report in assisting your State Medicaid agency in overseeing its Medicaid managed care program?

- ☐ Very useful
☐ Somewhat useful
☐ Not very useful
☐ Not at all useful

25. Please explain your answer.

Questions 26 - 28 refer to the optional external quality review activities in accordance with 42 CFR § 438.358(c).

26. Did your State Medicaid agency require the EQRO to conduct any optional activities during the last annual review period?

- ☐ No → skip to question 29
☐ Yes

27. Which of the optional activities did your State Medicaid agency have the EQRO conduct?

<i>check one box for each item</i>			
	Required	Did not require	
Validation of encounter data	<input type="checkbox"/>	<input type="checkbox"/>	
Administration and validation of surveys on quality of care	<input type="checkbox"/>	<input type="checkbox"/>	
Calculation of additional performance measures	<input type="checkbox"/>	<input type="checkbox"/>	
Conduct of additional performance improvement projects	<input type="checkbox"/>	<input type="checkbox"/>	
Conduct of quality focused studies on particular services	<input type="checkbox"/>	<input type="checkbox"/>	

28. Why did your State Medicaid agency choose these optional activities?

Questions 29 - 39 refer to your State Medicaid agency's general experience with the external quality review process.

29. Overall, what aspect(s) of the external quality review process does your State Medicaid agency consider to be the **most** valuable in overseeing its managed care program?

30. Please explain your answer.

31. Overall, what aspect(s) of the external quality review process does your State Medicaid agency consider to be the **least** valuable in overseeing its managed care program?

32. Please explain your answer.

33. Overall, has your State Medicaid agency encountered any barriers in implementing the external quality review process?

☐ No —→ skip to question 35

☐ Yes

34. If yes, please explain your answer.

35. Overall, how important a role does the external quality review process play in your State Medicaid agency's oversight of its managed care program?

- ☐ Very important
☐ Somewhat Important
☐ Not very important
☐ Not at all important

36. Please explain your answer.

37. Based on your State Medicaid agency's experience with the external quality review process so far, will it change the way it implements the review process in the future?

- ☐ Yes
☐ No

38. Please explain your answer.

39. What suggestions, if any, does your State Medicaid agency have on how CMS can improve its administration of the external quality review program?

Log #68

From: Deirdra Singleton
To: Scott.Whitaker@oig.hhs.gov
Date: 8/17/2007 6:43:46 PM
Subject: OIG Survey---Medicaid Non-Emergency Transportation

Mr. Whitaker,

South Carolina is diligently gathering the data to respond to the above referenced survey. We apologize for the delay and will have the info to you this coming week. thanks

Deirdra T. Singleton
Deputy Director/General Counsel
Department of Health and Human Services
1801 Main Street
Columbia, South Carolina 29201
(803)898-2795
(803)255-8210 fax

CC: Jan Polatty; Kathleen Snider

Brur file w/ this
log
your 1 year

From: Brenda James
To: Nancy Rabert
Date: 8/21/2007 12:12:29 PM
Subject: Re: Log #68

Nancy could this log be prepared for Emma Forkner's signature please. Thanks, bj

CC: Jan Polatty; Margarete Keller; Melanie Giese



State of South Carolina
Department of Health and Human Services

Mark Sanford
Governor

Emma Forkner
Director

September 11, 2007

Ms. Joyce M. Greenleaf
Regional Inspector General for Evaluations and Inspections
Office of Inspector General
John F. Kennedy Federal Building, Room 2225
15 New Sudbury Street
Boston, Massachusetts 02203

Dear Ms. Greenleaf:

Thank you for your survey request regarding external quality review organizations (EQRO) in Medicaid managed care for the State of South Carolina. Enclosed is the information you requested.

If possible, we look forward to receiving a copy of your completed report. Should you have any additional questions regarding our responses, please contact Ms. Beverly Hamilton, Division Director for Care Management, at (803) 898-4614.

Sincerely,

Melanie "BZ" Giese, RN
Bureau Director for Health Services

MG/r

Enclosures



DEPARTMENT OF HEALTH & HUMAN SERVICES

OFFICE OF INSPECTOR GENERAL

cc. Ms. Farkner

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John F. Kennedy Federal Building
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*Ref log #68
A Hack Survey*

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Department of Health and Human Services

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Rose Lichtenstein at (617) 565-2911 or rose.lichtenstein@oig.hhs.gov

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