



May 25, 2018

Mr. Aaron Sisk
President and Chief Executive Officer
Magnolia Health Plan
111 East Capitol St., Suite 500
Jackson, MS 39201

Via Email: asisk@centene.com

RE: Mississippi Medicaid Managed Care
EQR Protocol 4 Summary of Findings

Dear Mr. Sisk:

We have completed the review of the EQR Protocol 4 Summary of Findings for Magnolia Health Plan. Below are the findings from the Division:

- Finding 1.4 DOM will require a standard written attestation from the CCOs for all encounter data submissions, as required by 42 CFR 438.606.
- Finding 2.1 DOM requests Magnolia to validate that the transition to the Omni system has occurred.
- Finding 2.2 DOM requires that Magnolia create and implement a quality assurance process to ensure all updated data from the dashboard are reflected in the reports prepared for and submitted to DOM.
- Finding 2.3 The CCO received acknowledgement of the files from the FAC, but does not receive control totals. DOM is currently working with Conduent to ensure the exchange between Conduent and CCOs of the number of encounters submitted in the files are correctly received and loaded by the FAC.
- Finding 2.4: Magnolia (Centene) relocated its disaster recovery (DR) site to Rancho Cordova, CA in December 2017. The DR testing and DR certification was completed by DOM and Myers and Stauffer. No further action required.
- Finding 2.5 DOM requires that Magnolia perform Penetration testing on an annual basis by an outside vendor to test the vendor's ability to penetrate the system and to ensure changes were made to security settings.
- Finding 3.2 DOM requires that Magnolia meet the overall 98% encounter submission requirements, as defined in the Contract.
- Finding 3.3 Surplus encounters were noted in all service types based on the claims samples from Magnolia. Magnolia and Conduent should investigate the causes of surplus and missing encounters that appear to be present or missing in the FAC encounter data and ensure encounter data is updated in the FAC data warehouse for any discrepancies identified.
- Finding 3.5 DOM, Conduent and Magnolia should review and update the data dictionary to address errors related to the claims sample data containing values differing from the encounter data.
- Finding 3.7 DOM will require Magnolia to provide periodic updates of its Action Plan for Improvement in its subcontractor encounter data. This is due to an increase in oversight of Magnolia's

subcontractors related to encounter data and the high error rates in key data component testing and surplus encounter data.

- Finding 3.8 DOM requires that Magnolia monitor and report system issues to Conduent of MMIS_ICNs assigned to pharmacy claims by Magnolia or its pharmacy subcontractors.
- Finding 3.9 DOM requires that Magnolia be responsible to ensure that Magnolia's subcontractors are processing and paying claims and are in compliance with the contractual requirements.
- Finding 3.10 DOM will hold Magnolia responsible for the timeliness of its subcontractors' encounter submissions to the FAC within contractual requirements.
- Finding 4.1 DOM will require Magnolia to recoup the funds from the providers who do not submit medical record documentation to support the encounter data to the FAC, and hold Magnolia responsible to ensure that documentation be available for ten (10) years from the final date of the contract period or from the date of the completion of an audit, whichever is later to comply with the contractual requirements.
- Finding 4.2 DOM requires that Magnolia should ensure that there is proper oversight of medical records documentation and for Magnolia to increase its minimum standard from 80% to 90% of the requirements for medical record review.
- Finding 4.3 DOM's and Magnolia's program integrity sections should continue to coordinate efforts to ensure that DOM has the ability to direct specific reviews and/or independently review the results from these medical record reviews to maintain proper oversight and monitoring of the contractual requirements.

For each of the items in this letter requiring a documented response from Magnolia, DOM requests that response be provided within sixty (60) days from the date of this letter.

If you have any questions regarding our findings and requirements, please submit them in writing; within 15 business days of receipt of this email. For all other questions, contact Keith Heartsill at (601) 359-3904.

Sincerely,



Drew L. Snyder
Executive Director

DLS/tls: EQR Protocol 4 Summary of Findings

cc: Phil Allen, DOM
Tara Clark, DOM
Keith Heartsill, DOM
Sharon Jones, DOM
Rachelle Richardson, DOM