

Policy Title: SNP MOC Training for Staff, Provider and IPA/Medical Group		POLICY #: 50.2.27	
		Line of business: Medicare Adv	
Department Name: Utilization Management	Original Date 1/13	Effective Date 5/19	Revision Date 12/18
Department Head: 			Date: 3/21
Medical Services/P&T Committee: (If Applicable) 			Date: 3/21

PURPOSE

To establish processes to support compliance on how the Special Needs Plan ("SNP") conducts initial and annual Model of Care ("MOC") Training, for the Staff, New Hires, Providers and IPG/Medical Groups that interact with SNP Members to ensure they are provided with the necessary information regarding the Special Needs Plan Model of Care Program.

POLICY

Blue Shield of California Promise Health Plan ("Blue Shield Promise") Management Staff has established an orientation program to support the SNP Model of Care Program. Policies and procedures are reviewed annually by the Medical Services Committee ("MSC") which are then available to internal Staff and external contracted Providers and IPG/Medical Groups. This training includes, but not limited to:

- SNP MOC Program Training
- Health Risk Assessment ("HRA")
- Interdisciplinary Care Team ("IDCT")
- Enrollee Participation
- Overview of Medicare Policies and Procedure
- Company Regulations
- Changes within the plan, etc.

SNP Primary Care Providers and IPG/Medical Groups are sent a fax blast annually to notify them of the SNP MOC Program Training by the Blue Shield Promise Provider Network Operations (PNO) Department. This fax blast includes the website link directing them to the SNP MOC Program Training materials. Furthermore, the SNP MOC Program Training is part of the Provider Orientation of newly contracted groups.

The PNO Department is responsible for the oversight of the SNP MOC Program Training for the contracted IPA's. Compliance is tracked and reported through a corrective action plan ("CAP") to ensure all Staff, Providers and IPG/Medical Groups are up-to-date with their mandatory SNP MOC Program Training. The CAPs are then reported on a quarterly basis to the MSC. The Member Services Department uses a new hire check list and systematic notification for any new employees who are involved in the SNP MOC Program and will receive the annual and new hire MOC training. All employees have access to the SNP MOC training material that support the SNP MOC Program.

PROCEDURE

Staff Training

Blue Shield Promise delivers annual specialized SNP-related training to the Utilization Management Clinical staff and Premier Member Services. Attendance is documented in the form of meeting minutes and signed attestation statements for both the Clinical Staff and Member Services Premier staff that interface with the SNP Members. The staff involved is given handouts and materials that support the SNP MOC Program Training Policy at the time of the meeting. They are also provided with the website link, via e-mail, directing them to the CMS approved PowerPoint SNP MOC Training presentation.

After completing the SNP MOC Program Training staff is required to complete a post test to validate their compliance to the training. Each post test is review by the AVP, Clinical Program Development or a managerial designee. The completed post test with scoring results is documented and a copy is submitted to the Human Resources Department to be filed in the staffs respective personnel file. Each staff that completes the SNP MOC Program Training will receive a certificate of completion. Employees are encouraged to meet the SNP MOC Program standards and compliance through training, one-on-one and the audit process.

A SNP MOC Program annual acknowledgement compliance log is maintained as a tracking system to check the status of training attendance, testing and certificate distribution.

The AVP, Clinical Program Development and AVP of Medical Services are responsible for internal Clinical Staff SNP MOC Program Training that is annually conducted and is also available on an ad hoc basis for those unable to attend.

Annually the Member Services Department conducts mandatory Staff meeting for their department employees to update on any changes to enrollee benefits.

The Director of Appeals and Grievances is responsible for oversight training for delegated IPA/Medical Groups for SNP MOC Program Training requirements. This training is on, at least, an annual basis and is conducted at the Joint Operations Committee ("JOC") meetings. The IPA Compliance Department will disseminate the IPA Compliance Bulletin to all Blue Shield Promise Medicare contracted delegates. This will include information on the SNP MOC Program.

New Hire(s)

The Medical Services Department uses a new hire orientation checklist which includes the SNP MOC Program Training. Member Services uses the New Premier Employee Department Training Policy and checklist for training new Premier Member Services Representatives. The AVP, Clinical Program Development and Member Services Premier Manager ensure that the UM Department is made aware, through systematic notification, of new hires and their completion of the SNP MOC Program Training. Based on the start date of the new hire's employment, this training will be received on a quarterly basis or on an ad hoc basis for new hires unable to attend.

Provider and IPG/Medical Groups

Prior to the annual enrollment period the Blue Shield of California Promise PNO and Member Services Management Department develop a training schedule and list the internal and external required participants for SNP MOC Program Training. In order to identify relevant SNP

Providers, the Healthcare Informatics Department runs a report listing all SNP Providers and IPG/Medical Groups.

Using the list, the SNP Primary Care Providers and IPG/Medical Groups are sent a written notification, via fax blast by the PNO Department, annually to notify them of the SNP MOC Program Training. This fax blast includes the Provider web portal link directing them to the SNP MOC Program Training module. The module contains the SNP Guidance for the MOC Program, CMS approved SNP MOC PowerPoint Presentation and HRA Questionnaire. The fax blast also includes a SNP MOC Program Training Acknowledgment form and SNP MOC Program Evaluation form, which the provider is required to complete and return to Blue Shield Promise once they have reviewed and completed their training.

Providers can also attest to completion of training through the website, since both the Acknowledgment and Evaluation forms are also available online. Blue Shield of California Promise PNO will track which Providers return the SNP MOC Program Training attestation and identifying those as "completed". For Providers who do not return an attestation by one of the methods mentioned, Blue Shield Promise will conduct a phone campaign to obtain current fax and mailing address information. For those Providers who remain unreachable, Blue Shield Promise will conduct face-to-face training in order to obtain attestations. As part of the delegates' education, the MOC topics are expanded on the annual educational seminar's agenda. Blue Shield Promise provides on-site in-service to each of the delegates during their annual delegation audit, or whenever there is a need for an IPA/Medical Group training.

Implemented is a SNP Model of Care Evaluation to elicit feedback from the Providers and IPG/Medical Groups. The Provider Network Department will monitor and evaluate the feedback received and complete calls to Provider offices to address any questions or provide additional training support. Once the Provider and IPG/Medical Groups' MOC Evaluation feedback is comprehensively assessed, it will be reported quarterly to our Medical Services Committee.

The Medical Service Management team in conjunction with Healthcare Informatics and PNO are responsible for conducting the data analysis and identifying the SNP Providers who require MOC Program training. This Blue Shield of California Promise PNO team is also responsible for collecting evaluation forms reviewed by Providers to ensure completion (Please refer to Provider Orientation and Education Policy). Healthcare Informatics and PNO will provide data to the Medical Services Management team indicating which providers require telephonic outreach, and which providers completed the training online. Medical Services Management and Healthcare Informatics and PNO team therefore jointly share responsibility for SNP MOC Program training oversight.

EFFECTIVENESS MONITORING:

All Blue Shield Promise personnel with SNP MOC Program responsibilities are required to participate in the SNP MOC Program Training. All trainings are given with a specified date of completion. The delegated UM and PNO Staff are responsible and held accountable for the oversight and assurance of the mandatory SNP MOC Program Training implementation, completion and compliance. The AVP, Clinical Program Development has a SNP MOC Program Training tracking mechanism named the SNP MOC Program Annual Acknowledgement Compliance Log. This log captures:

- Staff who have completed training
- Signed training attestation
- Staff who have received training completion certificates

This is a comprehensive tracking system ensuring all Staff have met and understand the SNP MOC Program Training requirements. Staff not performing to meet the requirements set forth by the SNP MOC Program Training policies and procedures may be remediated by a corrective action plan (CAP). This includes re-education, training and/or one-on-one instruction. If an employee does not complete training as required, deficiency of training will be addressed and documented during Staff annual evaluation and/or disciplinary action will be coordinated with the Blue Shield Promise HR Department, if warranted.

Blue Shield Promise IPA Compliance Department in collaboration with the PNO Department is responsible for oversight of the initial and annual SNP MOC Program Training for those delegated Medical Groups and pertinent staff. They will generate oversight by conducting routine audits and impose a CAP for outcomes not meeting training goals. IPA Compliance staff will track and trend accordingly to further ensure compliance. The PNO and IPA Compliance Department will be reporting the CAPs on a quarterly basis to the MSC. These CAPs will be reported, monitored and tracked in conjunction with the Delegation Oversight Audits.

As part of the annual IPA Compliance audits, the SNP MOC tool has been integrated in the existing IPA Annual Due Diligence Audit Tool. For those groups receiving a CAP, an initial letter with a response due to Blue Shield Promise on a specified due date will be sent. IPA Compliance Department will track and follow-up the Delegate and monitor accordingly to ensure compliance. Additionally, the IPA Compliance Department will be reporting the CAP on a quarterly basis to the MSC.

If Providers and IPG/Medical Groups have not completed the SNP MOC Program Training and returned the attestation, then the following steps will occur:

- Fax SNP MOC Program Training materials to identified Providers and IPG/Medical Groups
- Mail materials to Providers and IPG/Medical Group who do not return attestation
- Telephonic outreach to non-responding Providers and IPG/Medical Groups
- Outreach and/or conduct face-to-face visit with unreachable Providers and IPG/Medical Groups

REFERENCES