

**Fee For Service (FFS) Medicaid and Third-Party Liability (TPL) Payment
Reconciliation and Auditing Processes
09/20/2024**

EOHHS needs to reconcile PPS2 payments made to CCBHCs to account for TPL payments made directly to the CCBHC and/or a partner DCO for the same set of services. The process described below applies to FFS Medicaid members with TPL which includes (1) Medicare FFS, (2) Medicare Advantage, and (3) commercial coverage.

Note: All CCBHC services and PPS2 payments are out-of-plan for dual eligible Medicaid-Medicare members enrolled in the Integrated Care Initiative (ICI) with Neighborhood Health Plan of Rhode Island (NHPRI). For the purposes of this process, these clients are treated as FFS Medicaid members.

I. CCBHC/DCO TPL Payment Report

1. CCBHCs will be required to submit a CCBHC/DCO TPL Payment Report using the State provided [CCBHC-DCO TPL Payment Report Template](#). This submitted data will be used alongside EOHHS claims data to validate the amount providers received in TPL payments.

II. Timeline and Process for Reporting

1. CCBHCs must submit the completed template to the State on a quarterly basis.
2. Results for the first quarter of the program (Oct-Dec 2024) should be submitted no later than February 15, 2025, with each subsequent report due to EOHHS within 45 days following the end of the quarter.
3. CCBHCs should submit the CCBHC/DCO TPL Payment Report to EOHHS. *Specific submission instructions will be shared soon.*

Note: CCBHCs must collect data from their contracted DCOs on TPL payments directly received by the DCO. CCBHCs are expected to develop their own internal Business Process for this, in partnership with their DCOs.

III. Overview of EOHHS TPL Reconciliation Process

1. EOHHS will conduct a TPL Payment Reconciliation Process which involves EOHHS reconciling PPS2 payments made to the CCBHC to account for TPL payments made to the CCBHC and/or its DCO. This process happens in parallel with the CCBHC reporting process defined above.
 - a. This process includes four key steps:
 - i. EOHHS extracts Medicare and Commercial TPL data for CCBHCs and DCOs from claims data;
 - ii. CCBHCs report to EOHHS any TPL payments received by the CCBHC and their contracted DCOs (*as described above*);
 - iii. EOHHS validates that the CCBHC's amount is in alignment with its claims data, or determines if further analysis is needed; and
 - iv. EOHHS recoups PPS2 revenue equivalent to the TPL collected by the CCBHC and DCO from a subsequent payment made by EOHHS to the CCBHC.

IV. Overview of TPL Payment Audit Process

1. EOHHS will conduct a TPL Payment Audit Process which will be used to hold CCBHCs responsible for billing TPL. This process only applies to CCBHC services included in the PPS2 bundled payments.
 - a. On a bi-annual basis for Demonstration Year 1, and then on an annual basis thereafter, EOHHS will audit providers using claims data to ensure that providers are appropriately billing TPL for members with TPL. EOHHS will work with CCBHCs to reconcile any identified outliers.