Colorado Indigent Care Program Manual

Fiscal Year 2017-18

Section II: Data Collection

Effective July 1, 2017



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ARTICLE I. PROGRAM OVERVIEW

Section 1.01 Program Data Definition

The Colorado Indigent Care Program (CICP) collects program utilization data from each of its providers on an annual basis. This data is aggregate and does not include information on individual patients. The CICP collects data on the total number of patients served, the total number of inpatient admissions and outpatient visits for those clients, and the total charge and liability amounts for services provided.

ARTICLE II. BILLING INFORMATION

Section 2.01 Definitions

CICP Data Collection System: Includes the specifications on how providers must submit inpatient and outpatient billing information to the Department. There is no electronic submission of claims, nor are paper claims accepted.

County Codes: County codes are used to track patient visits. Providers should include the patient's county code on the CICP discount card.

Indigent Patient (client): A person who meets the guidelines outlined in the Colorado Indigent Care Program Manual – Eligibility Section, which stipulates that the individual must have income and assets combined at or below 250% of the current Federal Poverty Level (FPL).

Emergency (Urgent) Care: Treatment for conditions of an acute, severe nature which are life, limb, or disability threats requiring immediate attention, where any delay in treatment would, in the judgment of the responsible physician, threaten life or loss of function of a patient or viable fetus.

Non-Emergency (Non-Urgent) Care: Treatment for any conditions not included in the emergency care definition and any additional medical care for those conditions the Department determines to be the most serious threat to the health of medically indigent persons.

Patient Liability: Client copayments are required for the CICP. Enter the amount due as a CICP copayment or copayment due from third-party insurance, whichever is lower. Enter the required copayment even if the provider did not receive full payment.

Total Charges: Total amount billed. The total charges billed to the CICP must be equal to the total charges billed to payers for equal medical services. Bill only one charge value, which is the sum of the detailed charge lines on a claim. Do not subtract Medicare or third-party payments from line charge amounts. This field cannot be negative.

Third-party Liability: Payments due from third-party insurance, including Medicare. These are not payments received, but the amount owed by the client's primary insurance. Do not include contractual adjustments as a payment due or as a liability. The CICP will reimburse for contractual adjustments.

Section 2.02 Provider Billing Information

There are four different types of billing information for the CICP:

Inpatient & Outpatient Service: All inpatient admissions and outpatient visits are billed using the CICP Data Collection System - Summary Format. This is the only required billing information and is due to the Department on an annual basis.

Outpatient Pharmaceutical: Providers that choose to report outpatient pharmaceutical charges to the Department shall separate Outpatient Pharmacy visits from regular inpatient and outpatient charges. If a client has an Outpatient Pharmacy visit (prescription only) that information will be reported separately from the regular billing information. If a client receives a pharmaceutical during an outpatient visit or inpatient admission, the pharmacy charge can be included on the regular claim information and it does not need to be separated out. Your facility must notify the Department of the intent to bill for Outpatient Pharmaceuticals on the Provider Application prior to the start of each fiscal year.

Physician Charges: Hospital providers have an option to bill the CICP for physician charges. Physician charges associated with clinic visits are considered part of the outpatient service and are included in the CICP Data Collection System.

Hospital physician charges are associated with care provided at the facility for CICP clients. The physician charges must not be included in the charges submitted under the CICP Data Collection System and must not be reimbursed by another source. Prior to billing, physicians must have an appropriate contract with the facility stating that the physician will follow the statutes and rules governing the CICP. An example of this contract is provided in Section V, Miscellaneous Documents, of this CICP Manual. Physicians cannot bill the CICP directly. The provider must handle all the billing for physician charges. No provider is obligated to bill for physician charges. <u>Prior to the start of each fiscal year, your facility must notify the Department on the Provider Application of the intent to bill for physician charges.</u>

Ambulance Charges: Hospital providers have an option to bill the CICP for emergency transportation charges associated with an ambulance service they own. The ambulance charges must not be included in the charges submitted under the CICP Data Collection System and must not be entirely reimbursed by another source. <u>Prior to the start of each fiscal year, your facility must notify the Department on the Provider Application of the intent to bill for ambulance charges.</u>

Section 2.03 Summary Format

The CICP Data Collection System – Summary Format includes the specifications on how providers must submit billing information to the Department. There is no electronic or paper submission of claims. The information is requested so that the Department can

identify funding available to specific providers and write the CICP Annual Report for the Colorado General Assembly.

Providers must submit billing information under the Summary Format and follow the guidelines set forth in Article IV Data Collection System – Summary Format. By using the Summary Format the Department does not receive claim level details, but rather summary totals for clients served at each provider. The summary information is submitted annually. The summary information can be sent to the Department as an e-mailed attachment.

Section 2.04 Timely Filing Requirement

Beginning in program year 2018-19, providers will be required to submit their program data on an annual basis with their annual application. This data will cover visits and admissions during the previous calendar year. In other words, any admissions or visits with a date of service between January 1, 2017 and December 31, 2017 will need to be included in the data submitted with the 2018-19 annual provider application.

For program year 2017-18, CICP will postpone the collection of program data for calendar year 2016 for hospitals due to concerns about hospital providers not being able to switch their data systems to fit the new format in time to include the data with their annual application.

Section 2.05 Retention of Billing Records

All billing records related to the contractor's or subcontractor's participation in the CICP must be maintained in a central location by the providers for a period of six State fiscal years after the expiration of each State fiscal year. This includes all the detailed information used to support the summary information submitted to the CICP. The Provider Compliance Audit mandated by the CICP requires that providers be able to identify all claims used to create the Summary Format submitted to the Department. Providers must keep the claim detail for a period of six State fiscal years to justify the information submitted to the Department.

ARTICLE III. THIRD-PARTY INSURANCE

Section 3.01 Medical Insurance

Charges to the CICP are secondary to all insurance programs.

- 1. Group and Individual Health Insurance applicants may be eligible for CICP coverage. The provider is required to bill the resource listed before submitting the claim to CICP. If the CICP provider is out of the client's primary insurance network, CICP clinic providers may seek a waiver from the Department regarding the necessity of providing proof of claim denial, prior to adjusting the patient account to reflect CICP discount and writing off charges to CICP. A waiver from this requirement is not available to CICP hospital providers.
- 2. Workers' Compensation applicants can participate in the CICP. However, the provider must bill Worker's Compensation before billing the CICP.
- 3. Victim's Compensation is the only third-party coverage billed after CICP coverage. Victim's Compensation may be used to cover the client's CICP copayment.
- 4. Health Maintenance Organization's (HMO) clients can participate in CICP. However, out of network services are not covered for CICP hospital providers. Services not available in the commercial HMO insurance policy and deemed medically necessary can be billed by hospital CICP providers to CICP minus the insurance copayment paid by the client. CICP clinic providers may submit write-off charges to CICP for primary care services provided to clients within an HMO, regardless if those services are a covered benefit under their HMO. If the CICP provider is out of the HMO network, CICP clinic providers may seek a waiver from the Department regarding the necessity of providing proof of claim denial, prior to adjusting the patient account to reflect CICP discount and writing off primary care charges to CICP.
- 5. Consolidated Omnibus Budget Reconciliation Act (COBRA) benefits are continued health plan benefits provided by the employer. Terminated employees or those who lose coverage because of reduced work hours may purchase the group coverage for themselves and families for a limited period of time. They have 60 days to accept coverage or lose all rights to these benefits. Once COBRA coverage is chosen, they will be required to pay for their coverage.
- 6. Medicare eligible clients have CICP coverage for amounts and services NOT covered by Medicare. Medicare has three main types of coverage:

(1) Medicare Part A is inpatient hospital coverage available to all people over age 65;

(2) Medicare Part B, outpatient services, requires clients to pay a monthly premium; and

(3) Medicare Part D is for prescription drug coverage.

(4) Some Medicare beneficiaries qualify for Health First Colorado as a Qualified Medicare Beneficiary (QMB). If an applicant has QMB coverage, they can participate in the CICP.

7. CICP can be used to satisfy the deductible or coinsurance for primary insurance, including Medicare. Clients are responsible for the CICP copayment or the copayment of the primary insurance, whichever is lower. The deductible or coinsurance should be included in Total Charges billed to the CICP. The only entry into Client Liability is the copayment required.

Section 3.02 Third-party Insurance

If the client has third-party insurance, including Medicare, the provider will bill the commercial health insurance policy first for all medical expenses incurred. Providers can report contractual adjustments negotiated under commercial health insurance contracts and Medicare contractual adjustments in Total Charges. The CICP will reimburse providers for contractual adjustments. Do not include contractual adjustment under Third-party Liability.

Health Insurance Billing Examples:

Example #1: Medicare Third-party Payment with CICP as Secondary Payer

Total Charges billed to Medicare	\$150 (Enter in Total Charges line in Summary)
Minus Payment due from Medicare	\$100 (Enter in Third Party Liability line)
Equals Hospital Charges Remaining	\$50
Minus Client Copayment	\$25 (Enter in Patient Liability line)
Equals Amount Charged to CICP	\$25 (Goes into Total Write Off Charges)

Example #2: Third-party Payment with CICP as Secondary Payer

Total Charges billed to Insurance	\$350 (Enter in Total Charges line in Summary)
Minus Payment due from Insurance	\$150 (Enter in Third Party Liability line)
Equals Hospital Charges Remaining	\$200
Minus Client Copayment	\$50 (Enter in Patient Liability line)
Equals Amount Charged to CICP	\$150 (Goes into Total Write Off Charges)

Section 3.03 Medicare Bad Debt

A provider can declare the percentage of Medicare deductibles or coinsurance not reimbursed by the client or a state program as Medicare Bad Debt. If a client qualifies for a state low-income program, such as CICP, the debt may be deemed uncollectible without applying a reasonable collection effort (such as turning the debt over to a collection agency). The maximum a provider can collect from a CICP eligible client is the CICP copayment, even if that client has another primary insurance such as Medicare.

Section 3.04 Subsequent Insurance Payments

If clients receive coverage under the CICP, and their insurance subsequently pays for services, or if the client is awarded a settlement, the provider must document any subsequent reimbursement received when submitting their summary data information.

Section 3.05 Previously Charged Claim Adjustments

General Information

Providers who receive payment for claims that have already been reimbursed by the CICP are required to report these payments. These payments can be made under the following circumstances:

- Client became enrolled in Health First Colorado or CHP+
- Settlement of lawsuits or other court ordered action in which the client or other 3rd party was required to pay the medical bill
- Client was incorrectly included on the CICP data submission

Previously charged claim adjustments are charges that the provider submitted to the CICP in a previous fiscal year. For example:

 The provider submits a \$100 charge to the Department with its annual provider application for FY 2017-18. Six (6) months later the provider learns that the client was enrolled in Health First Colorado during that period. The provider then submits the bill to Health First Colorado for proper reimbursement, but is unable to adjust its annual reporting to the Department since the data has already been submitted. The provider will submit the required information listed below with their annual provider application the following year to correct the charge that was incorrectly submitted to the Department.

Reporting Requirements

The following information is required for charges submitted to the Department that need to be adjusted after the close of the fiscal year in which the service was provided. Adjustments for different fiscal years must not be combined into one report and must be reported separately. The following information must be included in the report:

- Provider name
- Fiscal year that the claim was incorrectly reported
- Number of visits incorrectly reported
- Number of admissions incorrectly reported
- Total charges incorrectly reported
- Third-party liability incorrectly reported
- Patient liability incorrectly reported

Filing Requirements

Providers are required to notify the Department of any charges that need to be adjusted. This notification should be made in a letter to be included with the annual provider application. The facility's Chief Financial Officer (CFO) or Administrator should sign this letter.

ARTICLE IV. DATA COLLECTION SYSTEM – SUMMARY FORMAT

Section 4.01 Definition

Providers submitting billing information under the Summary Format must follow the guidelines set forth in this Article. In the Summary Format, the Department shall receive totals for clients served at each provider rather than claim-level detail.

Section 4.02 Outpatient Visits

Providers are requested not to use a span date when billing for outpatient services because a bill using a span date could be mistaken as one visit under the CICP Data Collection System, whereas the client might have actually received services several times in the month. Claims with a span bill date will still be allowable.

However, when counting the number of outpatient visits, providers are requested not to count claims, since many providers use a span billing. Instead, providers should count the actual number of visits by all CICP clients. If a client had four visits on one claim, four visits should be reported.

Section 4.03 Unduplicated Client Count

The unduplicated client count is the number of unique clients served by the provider. The Total Number of Unique Clients (not claims) by Age is the unduplicated client count of all clients served by the provider. The Total Number of Unique Inpatient Clients (not claims) by Age is the unduplicated client count for all clients served on an inpatient basis. The Total Number of Unique Outpatient Clients (not claims) by Age is the unduplicated client count for all clients served on an outpatient basis. For example:

- A single client could have two inpatient admissions and six outpatient visits at the hospital provider over the fiscal year. This client is counted once in the total unduplicated client count, only once in the unduplicated inpatient client count, and only once in the unduplicated outpatient client count.
- A single client could have four outpatient visits at the clinic provider over the fiscal year, and is counted only once in the total unduplicated client count.

Section 4.04 Summary Information Format

The Excel template for transmitting summary information to the Department was revised in April 2017. Providers must use this new reporting form. The form is part of the annual provider application due each spring, and should be completed and returned at the same time the application is submitted.

Total	Charges

<u>Charges</u>

Total Charges	\$0.00	Outpatient Urgent & Emergency	\$0.00
3rd Party Liability	\$0.00	Outpatient Non-Urgent & Non-Emergency	\$0.00
Patient Liability	\$0.00	Inpatient Urgent & Emergency	\$0.00
Write-Off Amount	\$0.00	Inpatient Non-Urgent & Non-Emergency	\$0.00
		Total Charges	\$0.00

Outpatient Visits

0-100%

101-250%

Unknown

0-17

65+

0-17

65+

18-64

18-64

Total

Total

Total

Total Number of Visits

Number of Visits by FPL

Number of Visits by Age

Outpatient Charges by Age

Inpatient Admits

Total Number of Admissions Total Number of Days

Number of Admissions by FPL

0-100% 101-250% Unknown

Total

Number of Days by FPL

0-100% 101-250% Unknown

Total

Number of Admits by Age 0-17 18-64 65+

Total

Inpatient Charges by Age 0-17 18-64 65+

Total

Unduplicated Patient Count

Total Number of Unique	Total Number of Unique	Total Number of Unique
Clients Served (not claims)	Inpatient Clients Served	Outpatient Clients Served
by Age	(not claims) by Age	(not claims) by Age
0-17	0-17	0-17
18-64	18-64	18-64
65+	65+	65+
Total	Total	Total

An example	e Clinic	provider	template	is	as follows:	
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Total Charges

Charges

Total Charges Total Charges 3rd Party Liability Patient Liability Write-Off Amount	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00	<u>Charges</u> Outpatient Urgent & Emergency Outpatient Non-Urgent & Non-Emergency Total Charges	\$0.00 \$0.00 \$0.0
Outpatient Visits Total Number of Visit Number of Visits by F 0-100% 101-250% Unknown Total	S	Unduplicated Patient Count Total Number of Unique Clients S (not claims) by Age 0-17 18-64 65+ Total	Served
Number of Visits by A 0-17 18-64 <u>65+</u> Total	Age		
Outpatient Charges b 0-17 18-64 65+ Total	y Age		

County Utilization

Admits & Visits I	by County (County code)

01 Adams	23 Garfield	45 Otero
02 Alamosa	24 Gilpin	46 Ouray
03 Arapahoe	25 Grand	47 Park
04 Archuleta	26 Gunnison	48 Phillips
05 Baca	27 Hinsdale	49 Pitkin
06 Bent	28 Huerfano	50 Prowers
07 Boulder	29 Jackson	51 Pueblo
08 Chaffee	30 Jefferson	52 Rio Blanco
09 Cheyenne	31 Kiowa	53 Rio Grande
10 Clear Creek	32 Kit Carson	54 Routt
11 Conejos	33 Lake	55 Saguache
12 Costilla	34 La Plata	56 San Juan
13 Crowley	35 Larimer	57 San Miguel
14 Custer	36 Las Animas	58 Sedgwick
15 Delta	37 Lincoln	59 Summit
16 Denver	38 Logan	60 Teller
17 Dolores	39 Mesa	61 Washington
18 Douglas	40 Mineral	62 Weld
19 Eagle	41 Moffat	63 Yuma
20 Elbert	42 Montezuma	64 Broomfield
21 El Paso	43 Montrose	Unknown
22 Fremont	44 Morgan	Total

ARTICLE V. OUTPATIENT PHARMACEUTICAL

Section 5.01 Definition

Outpatient Pharmaceuticals: Providers are required to separate Outpatient Pharmacy visits from regular inpatient and outpatient claims (charges). If a client has an Outpatient Pharmacy visit (prescription only) that information will be reported separately from the regular claim information. If a client receives a pharmaceutical during an outpatient visit or inpatient admission, the pharmacy charge is included on the regular claim information as it does not need to be separated out. Your facility must notify the Department prior to the start of the fiscal year of the intent to bill for Outpatient Pharmaceuticals on the Provider Application.

Section 5.02 Declaring Pharmaceutical Charges

Providers will submit to the Department a completed Pharmaceutical Charges worksheet stating the following summary information:

- Total Number of Visits (or prescription claims)
- Total Charges
- 3rd Party Liability
- Patient Liability

ARTICLE VI. PHYSICIAN CHARGES

Section 6.01 Definition

Physician Charges: CICP hospital providers have the option to bill the CICP for hospital-based physician charges. These are charges associated with care provided at the hospital facility for CICP clients. The physician charges must not be included in the charges submitted under the CICP Data Collection System or be completely reimbursed by another source. Prior to billing, physicians must have an appropriate contract with the facility stating the physician will follow the statutes and rules governing the CICP. An example of this contract is provided in Section V, Miscellaneous Documents, of the CICP Manual. Providers are not obligated to bill for physician charges, but if these charges are to be billed to the CICP, they must be submitted by the provider, not the physician. <u>Your facility must notify the Department prior to the start of the fiscal year of the intent to bill for physician charges on the Provider Application.</u>

Section 6.02 File Description

Excel Spreadsheet: Providers will submit to the Department a completed Physician Charges worksheet stating the following summary information:

Inpatients:

Urgent/Non-Urgent Charges Third Party Liability Patient Liability Number of Admissions Number of Days Number of Clients

Outpatients:

Urgent/Non-Urgent Charges Third Party Liability Patient Liability Number of Visits Number of Clients

ARTICLE VII. AMBULANCE CHARGES

Section 7.01 Definition

Ambulance Charges: CICP hospital providers who own their own ambulance service have the option to bill the CICP for emergency transportation or ambulance charges. The ambulance charges must not be included in the charges submitted under the CICP Data Collection System or be completely reimbursed by another source.

Section 7.02 File Description

Excel Spreadsheet: Providers will submit to the Department a completed Ambulance Charges worksheet stating the following summary information:

- Total Charges
- Third Party Payments
- Patient Liability
- Number of Claims