



# COMMONWEALTH of VIRGINIA

## *Department of Medical Assistance Services*

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October 14, 2021

### MEMORANDUM

**TO:** The Honorable Mark D. Sickles  
Chair, Joint Subcommittee for Health and Human Resources Oversight

The Honorable George L. Barker  
Vice Chair, Joint Subcommittee for Health and Human Resources Oversight

**FROM:** Karen Kimsey  
Director, Virginia Department of Medical Assistance Services

**SUBJECT:** Community Mental Health Rehabilitation Service (CMHRS) Provider Termination Report due November 1, 2021

This report is submitted in compliance with Item 313.E.9. of the 2021 Appropriation Act, which states:

*The Department of Medical Assistance Services shall modify its contracts with managed care organizations to require annual reporting with regard to Medicaid Community Mental Health Rehabilitation Services on: (i) the number of providers in their network and their geographic locations; (ii) the total number of provider terminations by year since fiscal year 2018 and the number terminated with and without cause; (iii) the localities the terminated providers served; and (iv) the number of Medicaid members the providers were serving prior to termination of their provider contract. The department shall modify its contracts with the managed care organizations to require compliance with these provisions, effective July 1, 2021, such that the first reporting of this information by the managed care organizations shall be submitted by September 1, 2021. The department shall report the data annually, not later than November 1, to the Joint Subcommittee for Health and Human Resources Oversight.*

Should you have any questions or need additional information, please feel free to contact me at (804) 786-8099.

KEK/  
Enclosure

pc: The Honorable Daniel Carey, M.D., Secretary of Health and Human Resources

The background features a blurred image of a person's hands in a white lab coat, one holding a stethoscope. A large green cross is centered over the hands. The entire scene is overlaid with a semi-transparent green layer containing various medical icons: a syringe, a pill, a virus, a group of three people, and a stethoscope. A dark grey diagonal band runs from the top right to the bottom left, containing the text.

# **VIRGINIA DEPARTMENT OF MEDICAL ASSISTANCE SERVICES**

**Medicaid Managed Care Organization  
Reporting of Providers and Provider  
Terminations**

**Report Issue Date: September 23, 2021**



**MYERS AND  
STAUFFER**  
L.C.  
CERTIFIED PUBLIC ACCOUNTANTS



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## Executive Summary

The Virginia Department of Medical Assistance Services (DMAS) engaged Myers and Stauffer LC (Myers and Stauffer) to assist with the development and test work of the newly required annual reporting by managed care organizations (MCOs) with regard to providers and provider terminations for Medicaid Community Mental Health Rehabilitation Services (CMHRS) in accordance with HB1800, Item 313, E.9 for the period July 1, 2018 through June 30, 2020. The engagement is performed in accordance with the American Institute of Certified Public Accountants' standards for consulting engagements.

House Bill 1800, Item 313, E.9 reads as follows: *The Department of Medical Assistance Services shall modify its contracts with managed care organizations to require annual reporting with regard to Medicaid Community Mental Health Rehabilitation Services on: (i) the number of providers in their network and their geographic locations; (ii) the total number of provider terminations by year since fiscal year 2018 and the number terminated with and without cause; (iii) the localities the terminated providers served; and (iv) the number of Medicaid members the providers were serving prior to termination of their provider contract. The department shall modify its contracts with the managed care organizations to require compliance with these provisions, effective July 1, 2021, such that the first reporting of this information by the managed care organizations shall be submitted by September 1, 2021. The department shall report the data annually, not later than November 1, to the Joint Subcommittee for Health and Human Resources Oversight.*

Community Mental Health Rehabilitation Services are described in the provider manual of the same title which was revised November 1, 2016 and May 14, 2019. The Addiction and Recovery Treatment Services (ARTS) program was implemented April 1, 2017 and certain services were carved out of CMHRS and into the ARTS program. CMHRS covered services for the period under review include:

- *Intensive In-Home Services for Children and Adolescents*
- *Therapeutic Day Treatment for Children and Adolescents*
- *Community-Based Residential Services for Children and Adolescents under 21*
- *Therapeutic Behavioral Services*
- *Day Treatment/Partial Hospitalization*
- *Psychosocial Rehabilitation*
- *Crisis Intervention*
- *Intensive Community Treatment*
- *Crisis Stabilization*
- *Mental Health Skill-building Services*



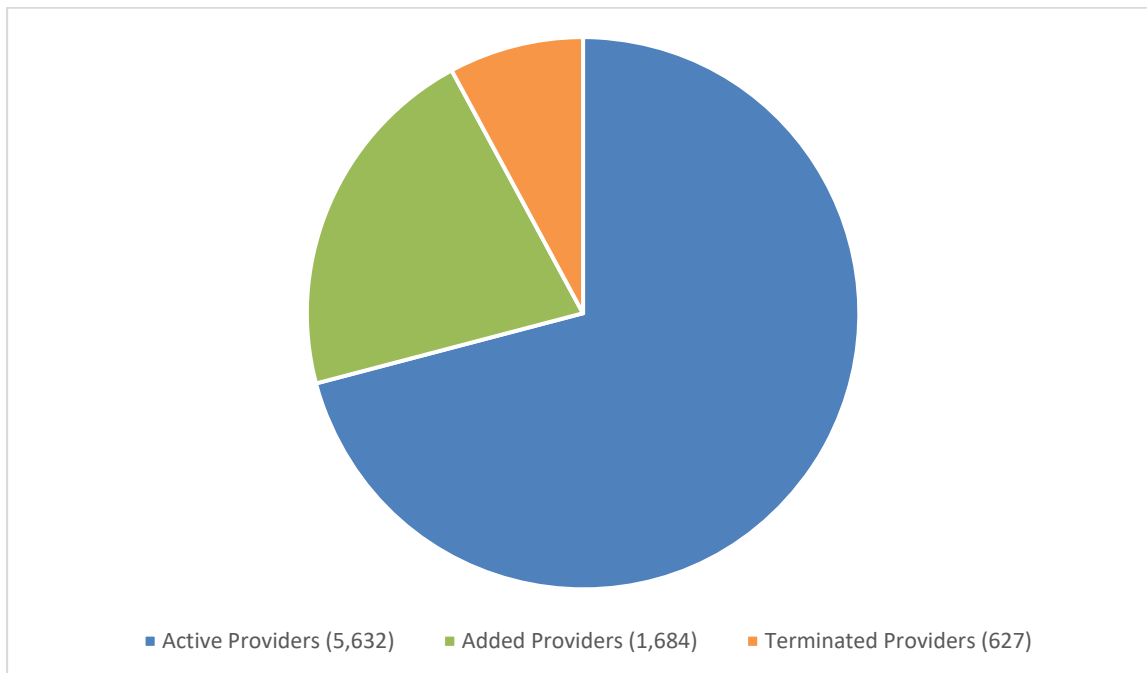
- *Mental Health Case Management*
- *Treatment Foster Care – Case Management*

The number of unique Medicaid members enrolled in an MCO and utilizing CMHRS during the reporting period was 105,149. This information was derived through encounter data for service codes specific to CMHRS and dates of service from July 1, 2018 through June 30, 2020.

### Summary of CMHRS Providers and Provider Terminations as of June 30, 2020

#### Statewide

In total, there were 7,943 providers identified as active managed care CMHRS providers during the period, with 627 of these providers terminated. To note, this chart represents the combined results of individual MCOs, thus providers may be duplicated amongst MCOs.





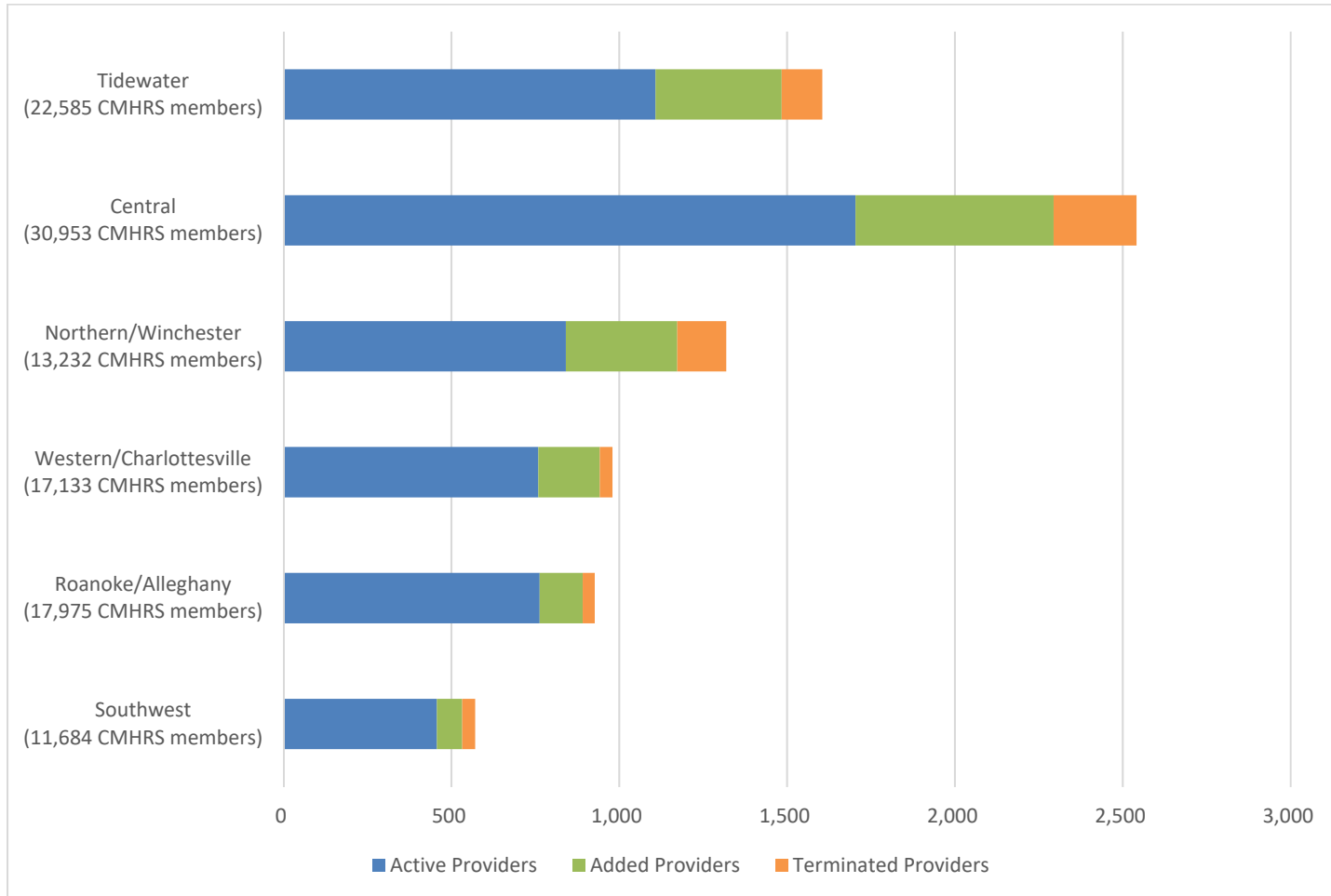
**By Locality**

Network providers were evaluated by locality and in context of the number of providers receiving CMHRS in each region. The below table shows the unduplicated providers in-network with any MCO as of June 30, 2020. For this purpose, each unique combination of rendering provider National Provider Identifier (NPI) and physical provider address is counted as an unduplicated provider. Encounter data was obtained from DMAS to include service codes specific to CMHRS and dates of service from July 1, 2018 through June 30, 2020. This encounter data included information to provide the below demographical information on unique members utilizing CMHRS.

Locality	Number of In Network Providers	Unique Medicaid Members Served
Tidewater	989	22,585
Central	1,483	30,953
Northern/Winchester	910	13,232
Western/Charlottesville	717	17,133
Roanoke/Alleghany	687	17,975
Southwest	472	11,684
<b>Totals</b>	<b>5,258</b>	<b>113,562</b>



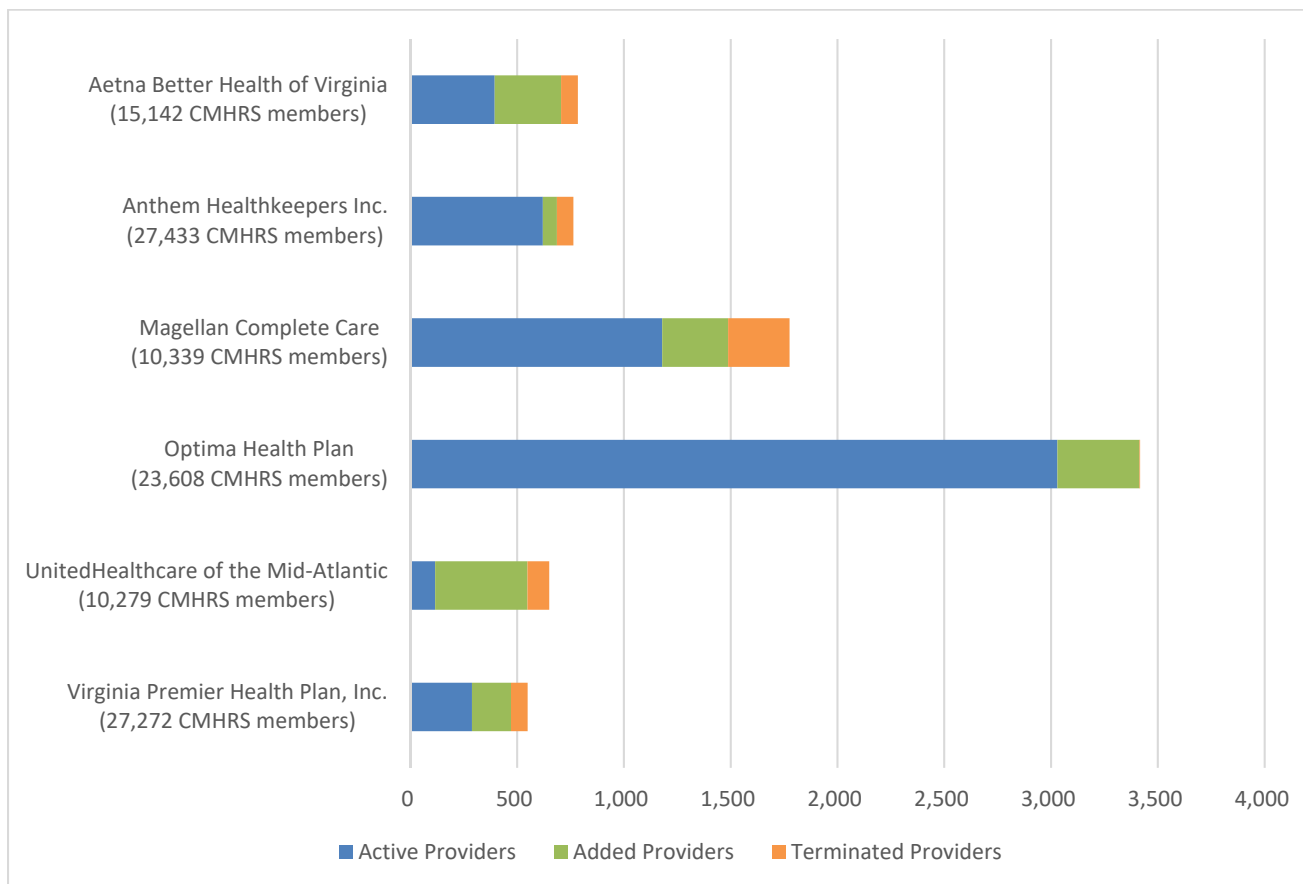
The Central region, with the largest number of utilizing members, also had the largest provider networks with 1,704 active providers and largest number of providers added to networks (590). The Southwest region, with the smallest population, had the smallest provider networks. This chart represents the combined results of individual MCOs, thus providers may be duplicated amongst MCOs.





By MCO

CMHRS networks were evaluated based on MCO. Optima Health had the largest network of CMHRS providers with 3,030 active providers, compared to UnitedHealthcare which reported the smallest networks of CMHRS providers, with 117 active providers. However, UnitedHealthcare also reported the largest number of providers added to their networks. This chart represents the combined results of individual MCOs, thus providers may be duplicated amongst MCOs.







### Conclusion

There were 7,943 CMHRS providers in network during State Fiscal Years June 30, 2019 and June 30, 2020 with the six Managed Care Organizations. Of these, 627 providers, or 8%, were terminated during the aforementioned State Fiscal Years. Reporting discrepancies were corrected for the purposes of this report and communicated to the MCOs for education purposes and to ensure more comparable data for future reports.

The combined results of individual MCOs is broken down by locality for the period under review is as follows. Note that providers that were added during this time are considered “in network”:

- *Tidewater had 1,605 CMHRS providers in network during the period, of which 121, or 8%, were terminated. The net result is 1,484 CMHRS providers in network as of June 30, 2020.*
- *Central had 2,541 CMHRS providers in network during the period, of which 247, or 10%, were terminated. The net result is 2,294 CMHRS providers in network as of June 30, 2020.*
- *Northern/Winchester had 1,319 CMHRS providers in network during the period, of which 146, or 11%, were terminated. The net result is 1,173 CMHRS providers in network as of June 30, 2020.*
- *Western/Charlottesville had 980 CMHRS providers in network during the period, of which 38, or 4%, were terminated. The net result is 942 CMHRS providers in network as of June 30, 2020.*
- *Roanoke/Alleghany had 927 CMHRS providers in network during the period, of which 36, or 4%, were terminated. The net result is 891 CMHRS providers in network as of June 30, 2020.*
- *Southwest had 571 CMHRS providers in network during the period, of which 39, or 7%, were terminated. The net result is 532 CMHRS providers in network as of June 30, 2020.*

This is broken down by MCO for the period under review as follows:

- *Aetna Better Health of Virginia had 785 CMHRS providers in network during the period, of which 79, or 10%, were terminated. The net result is 706 CMHRS providers in network as of June 30, 2020. There were 15,142 members utilizing CMHRS and enrolled in Aetna Better Health of Virginia. The providers terminated served 636 members.*
- *Anthem Healthkeepers Inc. had 764 CMHRS providers in network during the period, of which 77, or 10%, were terminated. The net result is 687 CMHRS providers in network as of June 30, 2020. There were 27,433 members utilizing CMHRS and enrolled in Anthem Healthkeepers Inc. The providers terminated served 1,308 members.*



- *Magellan Complete Care had 1,776 CMHRS providers in network during the period, of which 288, or 16%, were terminated. The net result is 1,488 CMHRS providers in network as of June 30, 2020. There were 10,339 members utilizing CMHRS and enrolled in Magellan Complete Care. The providers terminated served 425 members.*
- *Optima Health Plan had 3,417 CMHRS providers in network during the period, of which 3, or less than 1%, were terminated. The net result is 3,414 CMHRS providers in network as of June 30, 2020. There were 23,608 members utilizing CMHRS and enrolled in Optima Health Plan. The providers terminated served 17 members.*
- *UnitedHealthcare of the Mid-Atlantic had 651 CMHRS providers in network during the period, of which 102, or 16%, were terminated. The net result is 549 CMHRS providers in network as of June 30, 2020. There were 10,279 members utilizing CMHRS and enrolled in UnitedHealthcare of the Mid-Atlantic. The providers terminated served 1,437 members.*
- *Virginia Premier Health Plan, Inc. had 550 CMHRS providers in network during the period, of which 78, or 14%, were terminated. The net result is 472 CMHRS providers in network as of June 30, 2020. There were 27,272 members utilizing CMHRS and enrolled in Virginia Premier Health Plan, Inc. The providers terminated served 5,323 members.*



# Methodology

Myers and Stauffer met with DMAS to discuss the project scope and objectives. The methodology and approach were developed and approved.

## Reconciliation of Submitted Reporting

We developed a reporting template with instructions for the MCOs use in preparing the required annual reporting which were approved by DMAS. The reporting template is a single excel workbook which includes the following tabs:

- *Instructions*
- *Reporting Summary, which includes summary level reporting as outlined by HB1800 Item 313.E.9*
- *Provider data, which is intended to assist in supporting the summary information included on the reporting summary tab*

The reporting template was distributed to the MCOs on July 1, 2021 and Myers and Stauffer requested the information be returned by July 30, 2021. The MCOs returned the completed templates and we performed a review and reconciliation to ensure completeness prior to test work. The review and reconciliation uncovered a number of issues with the provider data tab not reconciling to the reporting summary tab and the majority of MCOs were asked to resubmit one or two times.

Several adjustments to reporting were made at this stage to agree the reporting summary to the supporting provider data.

- *Minor adjustments were needed to match the provider data reporting to the reporting summary for Aetna Better Health of Virginia, Anthem Healthkeepers Inc., Magellan Complete Care, and Virginia Premier Health Plan, Inc.*
- *Aetna Better Health of Virginia mis-matched the reporting in all columns for the Tidewater and Central localities in error. An adjustment was made to report correct information for these localities.*
- *Optima Health Plan duplicated providers by counting providers serving multiple localities by counting the provider in each locality served, thus overstating the number of providers in network and added for each SFY. Adjustments were made to remove duplicated providers.*

## Data-driven Testing: Completeness of Providers

Encounter data was obtained from DMAS to include service codes specific to CMHRS and dates of service from January 1, 2018 through June 30, 2020. The servicing National Provider Identifier (NPI) within the encounter data for each MCO was compared to the billing, servicing, and rendering NPIs



within the provider data reported by the MCOs. Any providers found within the encounter data that were missing from the submitted provider data were sent to the MCOs for explanation.

Discrepancies were found to be caused by:

- *Out of network providers included in the encounter data requiring no adjustments.*
- *Aetna Better Health of Virginia excluded certain CMHRS service codes from their submitted provider data. They supplied provider data for the excluded service codes for inclusion in the reporting summary.*
- *Magellan Complete Care pulled providers using internal sub designations rather than service codes defined as CMHRS within the provider manual and managed care technical manual. They supplied provider data for the additional providers identified utilizing service codes.*
- *Optima Health Plan erroneously excluded 51 CMHRS providers from their submitted provider data due to various reasons including provider statuses of “In Progress” versus “Approved”. They subsequently supplied provider data for the excluded service codes for inclusion in the reporting summary.*

### Data-driven Testing: Accuracy of Localities

The MCOs were asked to assign a primary locality served by each provider on the provider data tab. Locality codes used are defined in the MCO contract and are consistent with Virginia Federal Information Processing Standards (FIPS) codes. Each locality code has an associated major locality. For example locality 810, Virginia Beach, is associated with the major locality of Tidewater. The rendering provider zip code included within the submitted provider data was used to confirm the major locality reported by the MCO.

Discrepancies were found to be caused by:

- *Some MCOs reported out of state providers. All out of state providers were within border states and the major locality was reasonable given the location of the provider. No adjustments were made for out of state providers.*
- *Many MCOs reported numerous locality codes associated with each provider. If the MCO was unable to identify which locality is primarily used to group the providers into major localities, the first code listed was used. For Anthem Healthkeepers Inc. and Optima Health Plan, the rendering provider zip code provided a different major locality for a material number of providers. Adjustments were made to group these providers into major localities using the rendering provider zip code.*



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### Data-driven Testing: Members Served by Terminated Providers

The MCOs were asked to provide a count of Virginia Medicaid members served for each terminated provider. The rendering NPI per the provider data reported by the MCO was utilized to count unique Medicaid member IDs within the encounter data for that NPI. A six month look-back period was used for the purposes of this comparison. For example, if a provider was terminated on August 1, 2018, members with dates of service from February 1, 2018 through August 1, 2018 were counted.

Minor discrepancies were accepted as reasonable. After confirming the logic utilized by the MCO in counting members served at the time of termination, we determined the logic utilized by the MCOs resulted in consistent reporting.

Discrepancies were found to be caused by:

- *Anthem Healthkeepers Inc. and Virginia Premier Health Plan, Inc. had a small number of terminated providers with material differences in members served at the time of termination per the CMHRS encounter data provided by the Department and Virginia Premier’s reporting. Member counts were adjusted to the correct information.*

### Sampling

A sample of 30 providers (15 active and 15 terminated) from each MCO report was selected for additional testing. Active providers were selected randomly as the MCOs did not include a count of members served for active providers. For each terminated sample set, we selected 5 samples representing the largest number of Medicaid members served at the time of termination and the remaining 10 were selected randomly. For active and terminated providers sampled, we ensured they provided CMHRS through comparison to the encounter data and review of provider specialty and taxonomy codes. We did not confirm whether the termination was with or without cause as the MCOs did not report any with cause provider terminations.

There were no findings resulting from sampling.



# MCO Results

This section of the report provides findings specific to each MCO. The members served by terminated providers specific to each MCO are reported below. Overall, the MCOs terminated 627 providers serving 9,146 members. Statewide there were 5,258 CMHRS providers at June 30, 2020 and 105,149 members enrolled in an MCO and utilizing CMHRS during the reporting period.

## Aetna Better Health of Virginia

There were 15,142 unique Medicaid members enrolled in Aetna Better Health of Virginia (Aetna) and utilizing CMHRS during the reporting period.

### As Submitted Reporting Summary

2018 to 2019 data		Without Cause Provider Terminations SFY 6/30/2019 *			
Locality	# of Providers in Network as of 7/1/2018	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2019	# of Providers in Network as of 6/30/2019
Tidewater	193	2 (1.0%)	2	98	289
Central	90	2 (2.2%)	2	32	120
Northern/Winchester	55	0 (0%)	0	23	78
Western/Charlottesville	58	0 (0%)	0	18	76
Roanoke/Alleghany	40	0 (0%)	0	12	52
Southwest	29	0 (0%)	0	3	32
<b>Totals</b>	<b>465</b>	<b>4 (0.9%)</b>	<b>4</b>	<b>186</b>	<b>647</b>



2019 to 2020 data		Without Cause Provider Terminations SFY 6/30/2020 *			
Locality	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2020	# of Providers in Network as of 6/30/2020
Tidewater	289	39 (13.5%)	386	33	283
Central	120	12 (10.0%)	69	33	141
Northern/Winchester	78	5 (6.4%)	29	39	112
Western/Charlottesville	76	2 (2.6%)	2	9	83
Roanoke/Alleghany	52	0 (0%)	0	10	62
Southwest	32	1 (3.1%)	0	4	35
<b>Totals</b>	<b>647</b>	<b>59 (9.1%)</b>	<b>486</b>	<b>128</b>	<b>716</b>

\* No With Cause provider terminations were reported by the MCO

### Reconciliation of Submitted Reporting

- Aetna mis-matched the reporting in all columns for the Tidewater and Central localities in error. An adjustment was made to report correct information for these localities.
- Minor adjustments were needed to match the provider data reporting to the reporting summary. This resulted in eight providers removed from the number of providers in network as of 7/1/2018, three providers removed from the number of providers added during State Fiscal Year (SFY) 6/30/2019, two members added to the number of members served at the time of termination for without cause provider terminations during SFY 6/30/2020, and two providers removed from the number of providers added during SFY 6/30/2020.

### Data-driven Testing: Completeness of Providers

- There were 103 providers found within the CMHRS encounter data provided by the Department that were not included within Aetna’s reporting. Many of these were identified by Aetna as out-of-network providers, however 19 were in-network. Aetna provided the information to include these providers within reporting. This resulted in 17 providers added to the number of providers in network as of 7/1/2018, 4 providers serving 2 members added to the number of without cause provider terminations during SFY 6/30/2019, 2 providers added to the number of providers added during State Fiscal Year (SFY) 6/30/2019, and 12 providers serving 53 members added to the number of without cause provider terminations during SFY 6/30/2020.

### Data-driven Testing: Accuracy of Localities

- No issues were identified within Aetna’s reporting as a result of this testing.



Data-driven Testing: Members Served by Terminated Providers

There were five terminated providers with material differences in members served at the time of termination per the CMHRS encounter data provided by the Department and Aetna’s reporting. Aetna was not able to determine the cause of the difference for three terminated providers and for the remaining two terminated providers identified the difference was due to an internal reporting error. This resulted in 46 members added to the number of members served at the time of termination for without cause provider terminations during SFY 6/30/2019 and 43 members added to the number of members served at the time of termination for without cause provider terminations during SFY 6/30/2020.

Sampling

There were no findings resulting from sampling.

Adjusted Reporting Summary

Adjusted 2018 to 2019 data	Without Cause Provider Terminations SFY 6/30/2019 *				
	# of Providers in Network as of 7/1/2018	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination		
Tidewater	92	3 (3.3%)	46	32	121
Central	190	4 (2.1%)	6	98	284
Northern/Winchester	57	1 (1.8%)	0	23	79
Western/Charlottesville	58	0 (0%)	0	18	76
Roanoke/Alleghany	41	0 (0%)	0	11	52
Southwest	36	0 (0%)	0	3	39
<b>Totals</b>	<b>474</b>	<b>8 (1.7%)</b>	<b>52</b>	<b>185</b>	<b>651</b>





Adjusted 2019 to 2020 data	Without Cause Provider Terminations SFY 6/30/2020 *				
	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2020	
Locality					
Tidewater	121	13 (10.7%)	73	33	141
Central	284	39 (13.7%)	427	31	276
Northern/Winchester	79	5 (6.3%)	33	39	113
Western/Charlottesville	76	4 (5.3%)	50	9	81
Roanoke/Alleghany	52	2 (3.8%)	1	10	60
Southwest	39	8 (20.5%)	0	4	35
<b>Totals</b>	<b>651</b>	<b>71 (10.9%)</b>	<b>584</b>	<b>126</b>	<b>706</b>

\* No With Cause provider terminations were reported by the MCO



### Anthem Healthkeepers Inc.

There were 27,433 unique Medicaid members enrolled in Anthem Healthkeepers Inc. (Anthem) and utilizing CMHRS during the reporting period.

#### As Submitted Reporting Summary

2018 to 2019 data		Without Cause Provider Terminations SFY 6/30/2019 *			
Locality	# of Providers in Network as of 7/1/2018	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2019	# of Providers in Network as of 6/30/2019
Tidewater	110	0 (0%)	0	8	118
Central	244	0 (0%)	0	15	259
Northern/Winchester	157	0 (0%)	0	4	161
Western/Charlottesville	64	0 (0%)	0	5	69
Roanoke/Alleghany	78	0 (0%)	0	4	82
Southwest	48	0 (0%)	0	4	52
<b>Totals</b>	<b>701</b>	<b>0 (0%)</b>	<b>0</b>	<b>40</b>	<b>741</b>

2019 to 2020 data		Without Cause Provider Terminations SFY 6/30/2020 *			
Locality	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2020	# of Providers in Network as of 6/30/2020
Tidewater	118	14 (11.9%)	430	4	108
Central	259	33 (12.7%)	385	3	229
Northern/Winchester	161	18 (11.2%)	265	19	162
Western/Charlottesville	69	1 (1.4%)	1	1	69
Roanoke/Alleghany	82	5 (6.1%)	9	0	77
Southwest	52	7 (13.5%)	218	0	45
<b>Totals</b>	<b>741</b>	<b>78 (10.5%)</b>	<b>1,308</b>	<b>27</b>	<b>690</b>

\* No With Cause provider terminations were reported by the MCO

#### Reconciliation of Submitted Reporting

- Minor adjustments were needed to Anthem’s as-submitted reporting summary to match the provider data reporting to the reporting summary. This resulted in three providers removed from the number of providers in network as of 7/1/2018, one provider removed from the number of



without cause provider terminations during 6/30/2020, and one provider removed from the number of providers added during SFY 6/30/2020.

**Data-driven Testing: Completeness of Providers**

- No issues were identified within Anthem’s reporting as a result of this testing.

**Data-driven Testing: Accuracy of Localities**

- Anthem assigned localities using the county and city of each provider and mapping those to regions. The rendering provider zip code provided a different major locality for 63 providers in network as of 7/1/2018, 6 providers added during SFY 6/30/2019, and 1 provider serving 13 members terminated during 6/30/2020. These providers were reclassified to the correct locality using the rendering provider zip code.

**Data-driven Testing: Members Served by Terminated Providers**

- No issues were identified within Anthem’s reporting as a result of this testing.

**Sampling**

- There were no findings resulting from sampling.

**Adjusted Reporting Summary**

Adjusted 2018 to 2019 data	Without Cause Provider Terminations SFY 6/30/2019 *			# of Providers Added during SFY 6/30/2019	# of Providers in Network as of 6/30/2019
	# of Providers in Network as of 7/1/2018	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination		
Tidewater	110	0 (0%)	0	8	118
Central	228	0 (0%)	0	13	241
Northern/Winchester	180	0 (0%)	0	3	183
Western/Charlottesville	69	0 (0%)	0	9	78
Roanoke/Alleghany	69	0 (0%)	0	7	76
Southwest	42	0 (0%)	0	0	42
<b>Totals</b>	<b>698</b>	<b>0 (0%)</b>	<b>0</b>	<b>40</b>	<b>738</b>



Adjusted 2019 to 2020 data	Without Cause Provider Terminations SFY 6/30/2020 *				
	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2020	# of Providers in Network as of 6/30/2020
Tidewater	118	14 (11.9%)	430	3	107
Central	241	31 (12.9%)	372	2	212
Northern/Winchester	183	19 (10.4%)	278	19	183
Western/Charlottesville	78	1 (1.3%)	1	2	79
Roanoke/Alleghany	76	5 (6.6%)	9	0	71
Southwest	42	7 (16.7%)	218	0	35
<b>Totals</b>	<b>738</b>	<b>77 (10.4%)</b>	<b>1,308</b>	<b>26</b>	<b>687</b>

\* No With Cause provider terminations were reported by the MCO



### Magellan Complete Care

Magellan Complete Care (Magellan) was acquired by Molina Healthcare, Inc. effective December 31, 2020. There were 10,339 unique Medicaid members enrolled in Magellan and utilizing CMHRS during the reporting period.

#### As Submitted Reporting Summary

2018 to 2019 data		Without Cause Provider Terminations SFY 6/30/2019 *			
Locality	# of Providers in Network as of 7/1/2018	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2019	# of Providers in Network as of 6/30/2019
Tidewater	219	21 (9.6%)	2	36	234
Central	396	24 (6.1%)	39	51	423
Northern/Winchester	197	43 (21.8%)	1	40	194
Western/Charlottesville	164	7 (4.3%)	0	21	178
Roanoke/Alleghany	225	24 (10.7%)	3	10	211
Southwest	160	19 (11.9%)	1	8	149
<b>Totals</b>	<b>1,361</b>	<b>138 (10.1%)</b>	<b>46</b>	<b>166</b>	<b>1,389</b>

2019 to 2020 data		Without Cause Provider Terminations SFY 6/30/2020 *			
Locality	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2020	# of Providers in Network as of 6/30/2020
Tidewater	234	23 (9.8%)	19	19	230
Central	423	51 (12.1%)	22	22	394
Northern/Winchester	194	20 (10.3%)	5	5	179
Western/Charlottesville	178	11 (6.2%)	2	2	169
Roanoke/Alleghany	211	6 (2.8%)	5	5	210
Southwest	149	3 (2.0%)	4	4	150
<b>Totals</b>	<b>1,389</b>	<b>114 (8.2%)</b>	<b>57</b>	<b>57</b>	<b>1,332</b>

\* No With Cause provider terminations were reported by the MCO

#### Reconciliation of Submitted Reporting

- Adjustments were needed to Magellan’s as-submitted reporting summary to match the provider data reporting to the reporting summary. This resulted in 82 providers removed from the number



of providers in network as of 7/1/2018, 20 providers removed from the number of without cause provider terminations during SFY 6/30/2019, 23 providers removed from the number of providers added during SFY 6/30/2019, 6 providers removed and 278 members added to without cause provider terminations during SFY 6/30/2020, and 6 providers removed from the number of providers added during SFY 6/30/2020.

**Data-driven Testing: Completeness of Providers**

- There were 96 providers found within the CMHRS encounter data provided by the Department that were not included within Magellan’s reporting. Magellan identified they pulled submitted providers using internal sub designations rather than service codes defined as CMHRS within the provider manual and managed care technical manual. They supplied provider data for the additional 303 providers identified utilizing service codes.

**Data-driven Testing: Accuracy of Localities**

- No issues were identified within Magellan’s reporting as a result of this testing.

**Data-driven Testing: Members Served by Terminated Providers**

- No issues were identified within Magellan’s reporting as a result of this testing.

**Sampling**

- There were no findings resulting from sampling.

**Adjusted Reporting Summary**

Adjusted 2018 to 2019 data	Without Cause Provider Terminations SFY 6/30/2019 *			# of Providers Added during SFY 6/30/2019	# of Providers in Network as of 6/30/2019
	# of Providers in Network as of 7/1/2018	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination		
Locality					
Tidewater	244	22 (9.0%)	2	46	268
Central	413	22 (5.3%)	39	49	440
Northern/Winchester	272	45 (16.5%)	21	63	290
Western/Charlottesville	183	7 (3.8%)	2	14	190
Roanoke/Alleghany	194	9 (4.6%)	3	11	196
Southwest	162	19 (11.7%)	1	11	154
<b>Totals</b>	<b>1,468</b>	<b>124 (8.4%)</b>	<b>68</b>	<b>194</b>	<b>1,538</b>



Adjusted 2019 to 2020 data	Without Cause Provider Terminations SFY 6/30/2020 *				
	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2020	# of Providers in Network as of 6/30/2020
Tidewater	268	23 (8.6%)	13	31	276
Central	440	52 (11.8%)	283	31	419
Northern/Winchester	290	64 (22.1%)	20	39	265
Western/Charlottesville	190	11 (5.8%)	14	3	182
Roanoke/Alleghany	196	10 (5.1%)	26	7	193
Southwest	154	4 (2.6%)	1	3	153
<b>Totals</b>	<b>1,538</b>	<b>164 (10.7%)</b>	<b>357</b>	<b>114</b>	<b>1,488</b>

\* No With Cause provider terminations were reported by the MCO



### Optima Health Plan

There were 23,608 unique Medicaid members enrolled in Optima Health Plan (Optima) and utilizing CMHRS during the reporting period.

#### As Submitted Reporting Summary

2018 to 2019 data		Without Cause Provider Terminations SFY 6/30/2019 *			
Locality	# of Providers in Network as of 7/1/2018	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2019	# of Providers in Network as of 6/30/2019
Tidewater	1,369	0 (0%)	0	72	1,441
Central	1,987	2 (0.1%)	5	109	2,094
Northern/Winchester	887	0 (0%)	0	18	905
Western/Charlottesville	1,066	0 (0%)	0	35	1,101
Roanoke/Alleghany	1,158	0 (0%)	0	53	1,211
Southwest	620	0 (0%)	0	15	635
<b>Totals</b>	<b>7,087</b>	<b>2 (0.03%)</b>	<b>5</b>	<b>302</b>	<b>7,387</b>

2019 to 2020 data		Without Cause Provider Terminations SFY 6/30/2020 *			
Locality	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2020	# of Providers in Network as of 6/30/2020
Tidewater	1,441	0 (0%)	0	92	1,533
Central	2,094	1 (0.05%)	12	67	2,160
Northern/Winchester	905	0 (0%)	0	28	933
Western/Charlottesville	1,101	0 (0%)	0	182	1,283
Roanoke/Alleghany	1,211	0 (0%)	0	10	1,221
Southwest	635	0 (0%)	0	66	701
<b>Totals</b>	<b>7,387</b>	<b>1 (0.01%)</b>	<b>12</b>	<b>445</b>	<b>7,831</b>

\* No With Cause provider terminations were reported by the MCO

#### Reconciliation of Submitted Reporting

- Adjustments were needed to remove duplicated providers from Optima Health Plan's (Optima's) as-submitted reporting summary to match the provider data reporting to the reporting summary. Providers serving multiple localities were counted in each locality served, overstating





*the number of providers in network and added for each SFY. Duplicates were identified utilizing the rendering provider street address within the provider data reporting. This resulted in 4,054 providers removed from the number of providers in network as of 7/1/2018, 149 providers removed from the number of providers added during SFY 6/30/2019, and 265 providers removed from the number of providers added during SFY 6/30/2020.*

**Data-driven Testing: Completeness of Providers**

- *There were 91 providers found within the CMHRS encounter data provided by the Department that were not included within Optima's reporting. Many of these were either identified by Optima as out-of-network providers or an alternate NPI was identified by Optima. Optima identified that 51 of these providers were in-network and were erroneously excluded from their submitted reporting. Optima provided the information to include these providers within reporting. This resulted in 21 providers added to the number of providers added during SFY 6/30/2019 and 30 providers added to the number of providers added during SFY 6/30/2020.*

**Data-driven Testing: Accuracy of Localities**

- *Optima identified that the first locality presented should be used as the primary/major locality however this did not agree with the locality using the rendering provider zip code. The rendering provider zip code provided a different major locality for 76 providers in network as of 7/1/2018, 8 providers added during SFY 6/30/2019, and 14 providers added during SFY 6/30/2020. These providers were reclassified to the correct locality using the rendering provider zip code.*

**Data-driven Testing: Members Served by Terminated Providers**

- *No issues were identified within Optima's reporting as a result of this testing.*

**Sampling**

- *There were no findings resulting from sampling.*



Adjusted Reporting Summary

Adjusted 2018 to 2019 data		Without Cause Provider Terminations SFY 6/30/2019 *			
Locality	# of Providers in Network as of 7/1/2018	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2019	# of Providers in Network as of 6/30/2019
Tidewater	660	0 (0%)	0	47	707
Central	904	2 (0.2%)	5	55	957
Northern/Winchester	388	0 (0%)	0	12	400
Western/Charlottesville	409	0 (0%)	0	16	425
Roanoke/Alleghany	441	0 (0%)	0	33	474
Southwest	231	0 (0%)	0	11	242
<b>Totals</b>	<b>3,033</b>	<b>2 (0.1%)</b>	<b>5</b>	<b>174</b>	<b>3,205</b>
Adjusted 2019 to 2020 data		Without Cause Provider Terminations SFY 6/30/2020 *			
Locality	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2020	# of Providers in Network as of 6/30/2020
Tidewater	707	0 (0%)	0	40	747
Central	957	1 (0.1%)	12	57	1,013
Northern/Winchester	400	0 (0%)	0	12	412
Western/Charlottesville	425	0 (0%)	0	68	493
Roanoke/Alleghany	474	0 (0%)	0	8	482
Southwest	242	0 (0%)	0	25	267
<b>Totals</b>	<b>3,205</b>	<b>1 (0.03%)</b>	<b>12</b>	<b>210</b>	<b>3,414</b>

\* No With Cause provider terminations were reported by the MCO



### UnitedHealthcare of the Mid-Atlantic

There were 10,279 unique Medicaid members enrolled in UnitedHealthcare of the Mid-Atlantic (United) and utilizing CMHRS during the reporting period.

#### As Submitted Reporting Summary

2018 to 2019 data		Without Cause Provider Terminations SFY 6/30/2019 *			
Locality	# of Providers in Network as of 7/1/2018 **	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2019 **	# of Providers in Network as of 6/30/2019
Tidewater	52	1 (1.9%)	5	75	126
Central	65	1 (1.5%)	0	156	220
Northern/Winchester	47	1 (2.1%)	0	96	142
Western/Charlottesville	30	0 (0%)	0	23	53
Roanoke/Alleghany	14	0 (0%)	0	25	39
Southwest	11	0 (0%)	0	12	23
<b>Totals</b>	<b>219</b>	<b>3 (1.4%)</b>	<b>5</b>	<b>387</b>	<b>603</b>
2019 to 2020 data		Without Cause Provider Terminations SFY 6/30/2020 *			
Locality	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2020	# of Providers in Network as of 6/30/2020
Tidewater	126	25 (19.8%)	321	5	106
Central	220	55 (25.0%)	441	15	180
Northern/Winchester	142	8 (5.6%)	545	13	147
Western/Charlottesville	53	5 (9.4%)	56	2	50
Roanoke/Alleghany	39	6 (15.4%)	69	8	41
Southwest	23	0 (0%)	0	2	25
<b>Totals</b>	<b>603</b>	<b>99 (16.4%)</b>	<b>1,432</b>	<b>45</b>	<b>549</b>

\* No With Cause provider terminations were reported by the MCO

\*\* Effective October 31, 2017, UnitedHealthcare of the Mid-Atlantic purchased Inova Health Plan, LLC's Medicaid business.



**Reconciliation of Submitted Reporting**

■ No issues were identified within United’s reporting as a result of this testing.

**Data-driven Testing: Completeness of Providers**

■ No issues were identified within United’s reporting as a result of this testing.

**Data-driven Testing: Accuracy of Localities**

■ No issues were identified within United’s reporting as a result of this testing.

**Data-driven Testing: Members Served by Terminated Providers**

■ No issues were identified within United’s reporting as a result of this testing.

**Sampling**

■ There were no findings resulting from sampling.

**Adjusted Reporting Summary**

Adjusted 2018 to 2019 data	Without Cause Provider Terminations SFY 6/30/2019 *				# of Providers in Network as of 6/30/2019
	# of Providers in Network as of 7/1/2018 **	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2019 **	
Locality					
Tidewater	52	1 (1.9%)	5	75	126
Central	65	1 (1.5%)	0	156	220
Northern/Winchester	47	1 (2.1%)	0	96	142
Western/Charlottesville	30	0 (0%)	0	23	53
Roanoke/Alleghany	14	0 (0%)	0	25	39
Southwest	11	0 (0%)	0	12	23
<b>Totals</b>	<b>219</b>	<b>3 (1.4%)</b>	<b>5</b>	<b>387</b>	<b>603</b>



Adjusted 2019 to 2020 data	Without Cause Provider Terminations SFY 6/30/2020 *			# of Providers Added during SFY 6/30/2020	# of Providers in Network as of 6/30/2020
	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination		
Locality					
Tidewater	126	25 (19.8%)	321	5	106
Central	220	55 (25.0%)	441	15	180
Northern/Winchester	142	8 (5.6%)	545	13	147
Western/Charlottesville	53	5 (9.4%)	56	2	50
Roanoke/Alleghany	39	6 (15.4%)	69	8	41
Southwest	23	0 (0%)	0	2	25
<b>Totals</b>	<b>603</b>	<b>99 (16.4%)</b>	<b>1,432</b>	<b>45</b>	<b>549</b>

\* No With Cause provider terminations were reported by the MCO

\*\* Effective October 31, 2017, UnitedHealthcare of the Mid-Atlantic purchased Inova Health Plan, LLC's Medicaid business.



### Virginia Premier Health Plan, Inc.

There were 27,272 unique Medicaid members enrolled in Virginia Premier Health Plan, Inc. (Virginia Premier) and utilizing CMHRS during the reporting period.

#### As Submitted Reporting Summary

2018 to 2019 data		Without Cause Provider Terminations SFY 6/30/2019 *			
Locality	# of Providers in Network as of 7/1/2018	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2019	# of Providers in Network as of 6/30/2019
Tidewater	71	1 (1.4%)	1	32	102
Central	151	0 (0%)	0	61	212
Northern/Winchester	43	0 (0%)	0	10	53
Western/Charlottesville	48	1 (2.1%)	495	11	58
Roanoke/Alleghany	41	1 (2.4%)	2,842	5	45
Southwest	14	0 (0%)	0	2	16
<b>Totals</b>	<b>368</b>	<b>3 (0.8%)</b>	<b>3,338</b>	<b>121</b>	<b>486</b>

2019 to 2020 data		Without Cause Provider Terminations SFY 6/30/2020 *			
Locality	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2020	# of Providers in Network as of 6/30/2020
Tidewater	102	19 (18.6%)	2,761	24	107
Central	212	40 (18.9%)	4,307	22	194
Northern/Winchester	53	3 (5.7%)	43	3	53
Western/Charlottesville	58	9 (15.5%)	382	8	57
Roanoke/Alleghany	45	3 (6.7%)	175	3	45
Southwest	16	1 (6.3%)	8	2	17
<b>Totals</b>	<b>486</b>	<b>75 (15.4 %)</b>	<b>7,676</b>	<b>62</b>	<b>473</b>

\* No With Cause provider terminations were reported by the MCO

#### Reconciliation of Submitted Reporting

- A minor adjustment was needed to Virginia Premier’s as-submitted reporting summary to match the provider data reporting to the reporting summary. This resulted in one provider removed from the number of providers in network as of 7/1/2018.



**Data-driven Testing: Completeness of Providers**

■ No issues were identified within Virginia Premier’s reporting as a result of this testing.

**Data-driven Testing: Accuracy of Localities**

■ No issues were identified within Virginia Premier’s reporting as a result of this testing.

**Data-driven Testing: Members Served by Terminated Providers**

■ There were three terminated providers with material differences in members served at the time of termination per the CMHRS encounter data provided by the Department and Virginia Premier’s reporting. Virginia Premier identified the difference was due to reported member counts pulled using claims data including other than CMHRS claims. This resulted in 5,691 members removed from the number of members served at the time of termination for without cause provider terminations during SFY 6/30/2020.

**Sampling**

■ There were no findings resulting from sampling.

**Adjusted Reporting Summary**

Adjusted 2018 to 2019 data	Without Cause Provider Terminations SFY 6/30/2019 *				
	# of Providers in Network as of 7/1/2018	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination	# of Providers Added during SFY 6/30/2019	# of Providers in Network as of 6/30/2019
Tidewater	71	1 (1.4%)	1	32	102
Central	151	0 (0%)	0	61	212
Northern/Winchester	43	0 (0%)	0	10	53
Western/Charlottesville	48	1 (2.1%)	495	11	58
Roanoke/Alleghany	40	1 (2.5%)	2,842	5	44
Southwest	14	0 (0%)	0	2	16
<b>Totals</b>	<b>367</b>	<b>3 (0.8%)</b>	<b>3,338</b>	<b>121</b>	<b>485</b>



Adjusted 2019 to 2020 data	Without Cause Provider Terminations SFY 6/30/2020 *				
	# of Providers in Network as of 7/1/2019	# of Terminated Providers (Percent Terminated)	# of Members Served at time of Termination		
Locality					
Tidewater	102	19 (18.6%)	343	24	107
Central	212	40 (18.9%)	1,034	22	194
Northern/Winchester	53	3 (5.7%)	43	3	53
Western/Charlottesville	58	9 (15.5%)	382	8	57
Roanoke/Alleghany	44	3 (6.8%)	175	3	44
Southwest	16	1 (6.3%)	8	2	17
<b>Totals</b>	<b>485</b>	<b>75 (15.5%)</b>	<b>1,985</b>	<b>62</b>	<b>472</b>

\* No With Cause provider terminations were reported by the MCO