



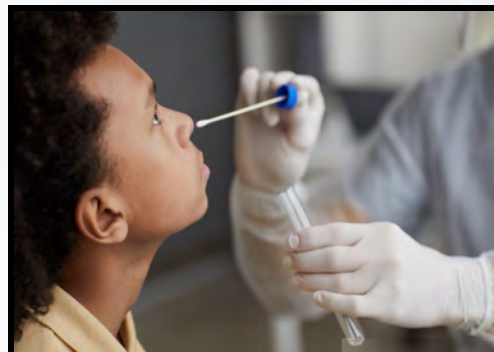
## **COVID-19 Oversight**

### **4C Digital Health**

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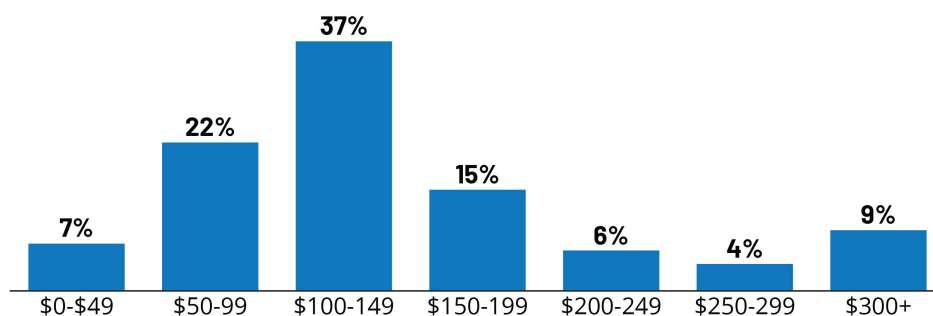
**Covid-19 Oversight:** As a result of disruptive impacts of Covid-19 on America's health system, 4C has developed a suite of targeted analytics to identify potential isolated and systematic errors in reimbursement. While the vast majority of 4C's oversight encompasses both Covid and non-Covid claims, the following is a sampling of reviews pertaining exclusively to the pandemic.

- Covid-19 Payment Integrity Review
  - Unbundling Testing
  - Excessive Units
  - Incorrect Code Combinations
  - Invalid DRG Add-On Payment
- Covid-19 Telehealth Review
  - Excessive Telemedicine Payments
  - Unbundling Telehealth Payments
    - Ineligible Physician/QHP Telemedicine
    - Ineligible Non-Physician Telemedicine
    - Ineligible Virtual Check-In
    - Excessive Online Digital Evaluation & Management
    - Incorrect Code Combinations



### Large Hospitals' Listed Prices for COVID-19 Tests Vary Widely

Distribution of Posted Prices for COVID-19 Diagnostic Tests



Source: KFF (Kaiser Family Foundation)

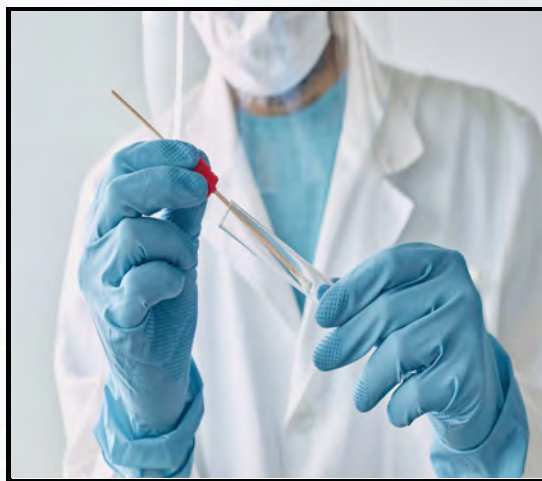


**Data Integrity:** To properly execute 4C's proprietary Covid-19 review and related suite of analytics, a robust data integrity review is performed to assess the quality of available information. This analysis entails both quantitative and qualitative evaluation of the data. These reviews range from evaluating if all fields are present and populated to a quality check of the received values in context. For example, the following list is a small sampling of the logic employed to identify if received data is potentially problematic:

- Missing key data elements (e.g., patient name or service date)
- Inappropriately mapped / populated fields (e.g., DRG populating as discharge date)
- Internally inconsistent data (e.g., claim total paid amount differs from aggregate of line amounts)
- Duplicative data entries (e.g., file repeatedly reflects the same episode of care)
- Data omissions (e.g., ensuring appropriate time and period is accounted for)
- Claim differentiation and versioning (i.e., ability to track changes to a claim over time)

Any identified concerns are raised and remedied through collaboration with appropriate parties to ensure high quality results. Ensuring comprehensive high-quality data is especially critical in the context of a pandemic when evaluating complex and interrelated episodes of care and comorbidities. Client benefits in now having a clean and complete data set for use as they deem acceptable.

**Claim Payment Accuracy:** 4C's Payment Validation coupled with Usage and Trend Analysis span a broad range of oversight. Payment Validation reviews include industry standard compliance in areas such as NCCI edits, coding practices (e.g., modifier usage, bundled codes), and duplicate payments among other areas of review. Payment Validation applies equally to Covid-19 and non-Covid claims as they pertain to industry norms and expectations. Usage and Trend Analyses are slightly different in that they identify actionable outliers isolated within communicated spend pertaining to excessive units, payment, and charges. Outlier trends are particularly germane in the context of a pandemic where utilization patterns are irregular.



**Payment Responsibility & Plan Payment Reconciliation:** Payment Responsibility and Plan Payment Reconciliation reviews ensure the appropriate parties pay for services rendered. This includes reviews of Eligibility, Workers Compensation, Subrogation, and the reconciliation of billings to data / benefit received. These reviews apply equally to Covid-19 and non-Covid members, however, are essential to ensuring the equitable distribution of cost in the system.

**Time Frame:** 4C will perform the Services on up to 6-years of claims data, engaging in both a retrospective and prospective view. This will allow for a thorough review of claims and operational oversight prior to and during the Covid-19 pandemic and beyond.

**Note:**

Our edits are constantly keeping up with Federal rules and regulations involving COVID testing and treatment policies. We ensure we are in sync with the latest Covid mandates and strategies.

