West Florida ACO, LLC, Generally Reported Complete and Accurate Data on Quality Measures Through the CMS Web Portal, but There Were a Few Reporting Deficiencies That Did Not Affect the Overall Quality Performance Score

What OIG Found
For 227 of the 240 sampled beneficiary-measures, West Florida complied with applicable Federal requirements by reporting complete and accurate data on quality measures through the CMS web portal. However, for the remaining 13 sampled beneficiary-measures, West Florida did not comply with requirements. Specifically, the medical records did not support that the beneficiaries (1) should have been either included in or removed from the measure population based on the exclusion criteria or (2) satisfied the conditions of the quality measures. Further, the medical records did not support the reported measurement values or the reported “Patient Reason” exception. Instead, the records supported (1) different measurement values that would have still satisfied the conditions of the quality measure or (2) a “Medical Reason” exception that would have still removed the beneficiary from the measure population.

These reporting deficiencies, which did not affect West Florida’s overall quality performance score, occurred because according to West Florida officials, the ACO participant staff (1) made clerical errors when entering the data and (2) presumed that the beneficiaries did not have an active diagnosis of depression and did not realize that the beneficiaries should have been removed for meeting the exclusion criteria for the depression screening measure. In addition, according to these officials, physicians find it difficult to distinguish between the two exception reasons and, based on a physician’s interpretation, either the “Patient Reason” exception or the “Medical Reason” exception may apply.

What OIG Recommends and West Florida Comments
We recommend that West Florida (1) ensure that it accurately reports all data on quality measures through the CMS web portal and (2) clarify with CMS its understanding of the exclusion criteria for a beneficiary to be removed from the measure population and the difference between the “Patient Reason” exception and the “Medical Reason” exception may apply.

West Florida concurred with our findings and described actions that it planned to take to address our recommendations.