| Audit Review Period:        |   |   |  |  |
|-----------------------------|---|---|--|--|
|                             | •   |   |  |  |
| Issue(s) of non-compliance: | compliance: Auditors: Issue Select All that Apply |   |  |  |
|                             | ,   | Oral and/or written service delivery request denial rationale   |  |  |
|                             |   | Oral and/or written service delivery request denial appeal notification   |  |  |
|                             |   | Service delivery request review by IDT members  |  |  |
|                             | ·   |   |  |  |
| Scope:                      |   | vice delivery request denial notification did not include the specific reasons for the denial in understandable language:<br>quest <u>denials</u> during the audit review period. Please include denied service delivery requests only. |  |  |
|                             | Oral and/or written ser                           | vice delivery request denial notification did not include appeal information:   |  |  |
|                             | All service delivery req                          | uest <u>denials</u> during the audit review period. Please include denied service delivery requests only.   |  |  |
|                             | The service delivery req                          | uest was not reviewed by the complete IDT:  |  |  |
|                             | All service delivery req                          | uests processed during the audit review period.   |  |  |
|                             |   |   |  |  |
| Instructions:               | General:  |   |  |  |
|                             | The review timeframe                              | is the audit review period. Errors noted prior to the audit review period should not be included.   |  |  |
|                             | After completing the In                           | mpact Analysis, if any changes need to be made to the Root Cause Analysis, please update the changes in the RCA tab.  |  |  |
|                             | Oral and/or written ser                           | vice delivery request denial notification did not include the specific reasons for the denial in understandable language:   |  |  |
|                             | Review each service de                            | elivery request denial to determine if oral and written notification of the denial included the specific reason for the denial in understandable language and s in the participant impact tab.  |  |  |
|                             | Oral and/or written ser                           | vice delivery request denial notification did not include appeal information:   |  |  |
|                             | Review each service de tab.                       | elivery request denial to determine if oral and written notification of the denial included appeal rights and respond to the questions in the participant impact  |  |  |
|                             | · ·   | uest was not reviewed by the complete IDT:  |  |  |
|                             | Review each service do impact tab.                | elivery request documentation to determine if all 11 IDT members were involved in the review of the request and respond to the questions in the participant   |  |  |
|                             | -   |   |  |  |
| Impact Analysis Due Date:   |   |   |  |  |

| Date Identified       | Brief Description Of Issue        | Condition Language                |
|-----------------------|-----------------------------------|-----------------------------------|
| (MM/DD/YY)            | (Completed By The CMS Audit Lead) | (Completed By The CMS Audit Lead) |
| (Completed By The CMS |                                   |                                   |
| Audit Lead)           |                                   |                                   |
|                       |                                   |                                   |
|                       |                                   |                                   |
|                       |                                   |                                   |
|                       |                                   |                                   |
|                       |                                   |                                   |

| Detailed Description of the Issue                       | Root Cause Analysis for the Issue | Methodology - Describe the process that  | # of Individuals | Action Taken to Resolve System/ |
|---|-----------------------------------|--|------------------|---------------------------------|
|   | (Explain why it happened)         | was undertaken to determine the # of     | Impacted         | Operational Issues              |
| (Explain what happened)                                 |                                   | individuals (e.g. participants) impacted |                  |                                 |
| (Remaining fields to be Completed by PACE Organization) |                                   |  |                  |                                 |
|   |                                   |  |                  |                                 |
|   |                                   |  |                  |                                 |
|   |                                   |  |                  |                                 |
|   |                                   |  |                  |                                 |
|   |                                   |  |                  |                                 |

| Date System/ Operational Remediation | Date System/ Operational Remediation | Actions Taken to Resolve Negatively Impacted Individuals | Date Individual Outreach and Remediation | Date Individual Outreach and |
|--------------------------------------|--------------------------------------|--|--|------------------------------|
| Initiated                            | Completed (MM/DD/YY)                 | Including Outreach Description and Status                | Initiated                                | Remediation Completed        |
| (MM/DD/YY)                           |                                      |  | (MM/DD/YY)                               | (MM/DD/YY)                   |
|                                      |                                      |  |  |                              |
|                                      |                                      |  |  |                              |
|                                      |                                      |  |  |                              |
|                                      |                                      |  |  |                              |
|                                      |                                      |  |  |                              |
|                                      |                                      |  |  |                              |

| General Information: This information is to be completed for all Impact Analyses |                       |                |                    |  |                        |                              |
|--|-----------------------|----------------|--------------------|--|------------------------|------------------------------|
| Participant First Name   | Participant Last Name | Participant ID | Date of Enrollment | Date of Disenrollment                          | Service/Item Requested | Date Request Received by IDT |
|  |                       |                | MM/DD/YYYY         | MM/DD/YYYY                                     |                        | MM/DD/YYYY                   |
|  |                       |                |                    | Enter NA if the participant is still enrolled. |                        |                              |
|  |                       |                |                    |  |                        |                              |
|  |                       |                |                    |  |                        |                              |

| This information is to be completed if the Impact Analysis is being requested for: Oral and/or written service delivery request denial rationale |  |  |   |  |  |
|--|--|--|---|--|--|
| Is there documentation or evidence that the participant  | Did documentation of the oral notification include the | Is there documentation or evidence that the  | Did documentation of the written notification include   |  |  |
| received oral notification of the denial?  | specific reason for the denial in a clear and          | participant received written notification of | the specific reason for the denial in a clear and       |  |  |
|  | understandable manner?                                 | the denial?                                  | understandable manner?                                  |  |  |
| (Yes/No)   |  |  |   |  |  |
|  | (Yes/No)   | (Yes/No)                                     | (Yes/No)  |  |  |
| If the auditor did not select Oral and/or written service  |  |  |   |  |  |
| delivery request denial rationale on the instructions tab the PO   | If the participant did not receive oral notification   |  | If the participant did not receive written notification |  |  |
| may enter NA in fields H-K.  | please respond - NA                                    |  | please respond - NA                                     |  |  |
|  |  |  |   |  |  |
|  |  |  |   |  |  |
|  |  |  |   |  |  |

| This information is to be completed if the Imp | pact Analysis is being requested for: Oral and/or writt | en service delivery request denial appeal notif | ication  |
|--|---|---|--|
| Is there documentation or evidence that the    | Did documentation of the oral notification include      | Is there documentation or evidence that the     | Did documentation of the written notification        |
| participant received oral notification of the  | the participant's right to appeal the denial?           | participant received written notification of    | include the participant's right to appeal the denial |
| denial?  |   | the denial?                                     | and information describing both the standard and     |
|  | (Yes/No)  |   | expedited appeals processes?                         |
| (Yes/No)                                       |   | (Yes/No)  |  |
|  | If the participant did not receive oral notification    |   | (Yes/No)   |
| If the auditor did not select Oral and/or      | please respond - NA                                     |   |  |
| written service delivery request denial        |   |   | If the participant did not receive written           |
| appeal notification on the instructions tab    |   |   | notification please respond - NA                     |
| the PO may enter NA in fields L-O.             |   |   |  |
|  |   |   |  |

| This information is to be completed if the Impact Analysis is being requested for: Service delivery request review by IDT members  |  |   |  |   |  |
|--|--|---|--|---|--|
|  |  |   |  |   |  |
| is there documentation that, at some point during the processing of the service delivery request, the request was reviewed by all  | Which IDT members were NOT involved in       | Was the service delivery request approved | For approvals, did the participant receive   | If the participant received the item/service, | What documentation or evidence is there to   |
| 11 disciplines of the IDT?   | the review of the service delivery request?  | or denied?                                | the service/item?                            | what was the date received?                   | show the participant received the item or    |
|  |  |   |  |   | service?                                     |
| (Yes/No)   | Enter NA if the service delivery request was |   | (Yes/No)                                     | MM/DD/YYYY                                    |  |
|  | reviewed by all 11 IDT disciplines.          |   |  |   | Enter NA is the service delivery request was |
| In order to answer Yes, the organization must have documentation or evidence that all 11 disciplines reviewed the request          |  |   | Enter NA is the service delivery request was | Enter NA is the service delivery request was  | denied.                                      |
| between the request being made (participant indicating a need) and the decision being rendered (approving or denying the           |  |   | denied.                                      | denied.                                       |  |
| request).  |  |   |  |   |  |
|  |  |   |  |   |  |
| If the auditor did not select Service delivery request review by IDT members on the instructions tab the PO may enter NA in fields |  |   |  |   |  |
| P-U.   |  |   |  |   |  |

| General Information: This information is to be completed for all Impact Analyses  |
|---|
| Optional: Please note, you do not have to complete this column.   |
| If there are any mitigating factors that you would like CMS to consider related to a<br>specific service delivery request, please enter the information in this column. |
|   |