



**Administration**

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**REQUEST FOR PROPOSAL (“RFP”) FOR CODING AND BILLING COMPLIANCE AUDITING SERVICES  
FOR PENOBSCOT COMMUNITY HEALTH CENTER, INC.**

I. Invitation and General Information

Penobscot Community Health Center, Inc. (“PCHC”) requests proposals from entities who are in the business of offering coding and billing auditing services to health care entities (“Bidder”) as further described in this RFP. PCHC is a nonprofit, Section 501(c)(3) tax-exempt corporation with its administrative offices located in Bangor, Maine (“PCHC”). PCHC operates a Federally Qualified Health Center (“FQHC”) with multiple sites located in Penobscot, Somerset, and Waldo Counties, Maine. PCHC receives reimbursement for health care services from Medicare, MaineCare, and commercial payors, and also receives state and federal grants, including grants from the U.S. Department of Health and Human Services, Health Resources & Services Administration (“HRSA”), and from the Maine Department of Health and Human Services.

All information provided by PCHC in connection with this RFP, including the fact that PCHC has issued this RFP, is considered confidential and proprietary information and may not be disclosed to anyone outside of your entity without PCHC’s prior written approval. All proposals and other documentation any entity submits in response to this RFP will become PCHC’s property, will not be returned, and must be clearly marked as confidential if your entity considers any material or information contained in its proposal or other documentation confidential.

Only Bidders with experience in conducting coding and billing compliance audits for FQHCs may respond to this RFP. Bidders with an established Maine presence are strongly preferred. Proposals will be accepted until **5:00 PM EST, July 31, 2020**. It is the responsibility of each Bidder to make sure that its proposal is timely and properly delivered. Proposals may be sent via U.S. Mail and/or electronically to:

Ragner E. Jaeger, Esq.  
Compliance Officer & Associate General Counsel  
PCHC  
103 Maine Ave.  
Bangor, ME 04401  
207-992-9200  
[ragner.jaeger@pchc.com](mailto:ragner.jaeger@pchc.com)

Any proposal received after 5:00 PM on July 31, 2020, may be reviewed in PCHC’s sole discretion. Questions or comments regarding this RFP period must be submitted to Mr. Jaeger on or before July 31, 2020.

PCHC is not obligated to accept any proposal or to negotiate with any Bidder. Following selection of the preferred proposal, PCHC will negotiate with the successful Bidder as to a satisfactory contract or other agreement with respect to the services covered by the proposal. In the event PCHC is unable to negotiate a satisfactory contract with the successful bidder, PCHC reserves the right to enter into contract negotiations with another bidder in PCHC’s sole discretion. The

selection process is not final until a satisfactory contract has been executed. Their selection of the successful Bidder is not subject to appeal.

This RFP is not in any way to be construed as an agreement, obligation or other contract between PCHC and any person or entity submitting a proposal. All costs directly or indirectly related to responding to this RFP will be borne by the person and/or entity.

**RFP Timeline**

<b>Activity</b>	<b>Date</b>
RFP Distribution	June 8, 2020
RFP Responses Due	July 31, 2020
Proposal Review	August 3 - 7, 2020
Finalists Notified	By August 10, 2020
Interviews with Finalists	August 17 – August 28, 2020
Selection of Broker and Notification	By September 4, 2020

II. Organizational Information

PCHC is the largest and most comprehensive of the 19 FQHC organizations in Maine and the 2nd largest of the 100 in New England, with a \$70 million budget and approximately 800 employees, including approximately 150 providers: physicians, nurse practitioners, physicians’ assistants, registered nurses, pharmacists, LCSWs, LCPCs, psychiatrists, dentists, chiropractors, and physical therapists, among others. PCHC has approximately 65,000 patients with roughly 350,000 visits annually. 70% of PCHC’s patient population are lower income persons and seniors.

PCHC approaches the delivery of medical care through the medical home model, coordinating individual patient care throughout the entire medical team and enhancing the patient-provider relationship to improve health outcomes. PCHC has been providing this type of care since 1997. PCHC providers focus on individual patient needs, proactively treating chronic illnesses and influencing healthier behaviors for better health management. As a Medical Home, PCHC continuously strives for clinical excellence by:

- Putting each patient and their health care at the center.
- Providing 24/7 access to health care services through extended hours, walk-in appointments, PCHC eHealth, and after-hours on call providers.
- Using health information technologies, such as electronic medical and dental records.
- Organization-wide quality measurement and improvement efforts.

- Care management for at-risk patients.
- Health coaches for patients with chronic conditions.



PCHC has been nationally recognized by the National Council for Quality Assurance (NCQA) and the Maine Patient-Centered Medical Home Pilot for its excellence in patient services, use of best practices, and integration of health information technologies.

Please see attached for PCHC's organizational structure.

### III. Scope of Services

PCHC seeks proposals from entities that are in the business of conducting coding and billing compliance audit services, including both comprehensive and targeted audits, as follows:

- Advise on best practices with respect to prospective and retrospective coding and billing compliance audits.
- Conduct comprehensive coding audits of identified samples at an identified interval.
- Determine the accuracy and integrity of coding in accordance with ICD-10-CM/PCS Official Guidelines for Coding & Reporting, CPT Guidelines, AHA Coding Clinic, CPT Assistant, Centers for Medicare and Medicaid rules and regulations, as well as FQHC specific coding and abstracting guidelines.
- Determine that all pertinent diagnoses and procedures have been appropriately captured by the provider for medical necessity and coding compliance purposes.
- Identify documentation issues that could impact revenue, coding compliance, and/or quality reporting data.
- Evaluate accuracy on a coder specific basis and identify any areas for educational improvement.
- Identify provider documentation improvement opportunities on a provider specific basis and identify any areas for educational improvement.
- Provide targeted and general education to providers via WebEx or in person to review findings and/or provide education related to the audit findings.
- Provide FQHC leadership with routine and timely updates on any changes to applicable laws and regulations relating to coding and billing, ICD-10-CM/PCS Official Guidelines for Coding & Reporting, CPT Guidelines, AHA Coding Clinic, CPT Assistant, Centers for Medicare and Medicaid rules and regulations, as well as FQHC specific coding and abstracting guidelines prior to the effective date of changes.

#### IV. Proposal Instructions

All proposals shall be submitted in the format as specified below. Lengthy narrative is discouraged. All written presentations should be brief, concise, and not include extraneous or unnecessary promotional material. The proposal should be in a pdf format (zipped if necessary) not exceeding 50 pages in length.

1. Experience. Please summarize relevant coding and billing compliance audit experience, including experience with FQHCs specifically.
2. Qualifications. Please summarize the qualifications of each individual who will be involved in providing the services to PCHC, including professional and educational background, relevant experience, memberships in relevant professional associations, position in the organization, presentations and publications, and any other qualifications that may be helpful in evaluating the individual's ability to meet PCHC's needs.
3. Fee Arrangement. Please describe the bidder's proposed fee arrangement for providing the services. If the proposed fee arrangement is based on hourly billing, please include the hourly billing rates of each individual involved, and the time increments upon which services will be billed. Please describe the bidder's policies and practices with respect to any charges for expenses. Additionally, PCHC welcomes proposals for alternative fee arrangements, such as a fixed fee for defined services. If the bidder wishes to propose a particular form of engagement letter, fee agreement, or other contract for services, please include it with the proposal.
4. Access. Please describe the bidder's expectations as to availability of and access to PCHC's records, technology, systems, and facilities. Additionally, please describe the bidder's likely time frame for responding to communications from PCHC and any other service level expectations the bidder will maintain.
5. Compliance. Because fees for services to PCHC may be funded in part by resources allocated by the federal government, each bidder must certify its ability and willingness to comply with applicable federal requirements, including but not limited to equal employment opportunity requirements.
6. Contact Information. Each bid must identify the individual who will serve as the bidder's contact person for purposes of this RFP, and provide that individual's contact information, including mailing address, telephone number and email address.
7. Limitations. Please describe generally any potential limitations on the bidder's ability to provide all needed coding and billing compliance audit services to PCHC. (If the limitation relates to a potential conflict of interest, the proposal need not disclose the specific clients or matters giving rise to the potential conflict if that information would otherwise be confidential.)
8. Schedule. Please describe the bidder's anticipated schedule or cycle for performing comprehensive coding and billing compliance audits, including delivery of audit reports, and any assumptions related to the anticipated schedule.
9. References. Provide five client references, at least two of which are FQHCs, for whom your firm has performed work similar to that requested in this RFP. For each client, provide:

- Client name and address.
- The telephone number and email address for a client contact person.
- A description of the scope of the project performed for the client/nature of the client representation.
- The duration of the client relationship PCHC will contact references only if the bidder is invited to an in-person meeting with PCHC to discuss the RFP.

10. Additional Information. Please supply answers to the following questions:

- If your firm is the successful applicant, how will you consistently ensure PCHC is satisfied with the partnership?
- Please provide information relating to programs and initiatives the Bidder is currently administering to facilitating hiring and retaining individuals of color, women, individuals with disabilities and veterans. Please include information regarding the efficacy of those programs and initiatives, including how many individuals of color, women, individuals with disabilities and veterans are partners and/or equity partners.
- How the Bidder trains and mentors its employee?
- Describe the levels of coverage for commercial insurance and any professional liability insurance the Bidder carries.
- Identify any adverse determinations, findings and/or judgments against the Bidder with respect to actions, proceedings, claims, or complaints of any kind under any local, state, or federal laws or regulations within the past 5 years.
- Identify any data security breaches that have happened to the Bidder within the past 5 years.
- Describe measures that the Bidder undertakes to protect client information against cyber security risk.

IV. Evaluation and Selection

Bidders shall be evaluated on metrics including but not limited to the following measures:

<b>Selection Domain</b>	<b>To earn full points in each domain, the applicant must demonstrate:</b>	<b>Points</b>
<b>Capability</b>	Proven record of success in delivering services in the content areas described in section III (Scope of Services).	<b>30</b>
<b>Provider Educational Programs and Materials</b>	Copies of training materials that illustrate effective and accurate information.	<b>30</b>
<b>Cost/Value</b>	Fee arrangements, including flat fees, blended rates, etc.	<b>20</b>
<b>Diversity and Inclusion</b>	The strength and efficacy of the firm's diversity and inclusion initiatives.	<b>20</b>

Based on a review and scoring of the written response as described above, PCHC will identify those Bidders who will be asked to participate in an interview. The presentation shall:

- Confirm proposal representations;
- Supplement information obtained through the proposal process;
- Give PCHC the opportunity to meet the individuals who would be assigned to the account.

Each Bidder selected for interview will be evaluated with consideration given to how they best meet the needs of PCHC and on the strength of capabilities described in all written proposals and oral presentations. The Bidder that best matches PCHC's objectives will be selected. PCHC reserves the sole right to reject any or all proposals, to waive any irregularities or informalities in the proposals received and to change the evaluation process described herein if circumstances dictate this or it is otherwise in the best interest of PCHC to do so.

The committee evaluating RFP's shall consist of the following individuals, but may be modified at PCHC's sole discretion:

Chair: Ragner E. Jaeger, Esq., Compliance Officer & Associate General Counsel  
 Members: Megan Sanders, Esq., Chief Legal Officer & Chief Human Resources Officer  
 Franco Colella, Revenue Cycle Director  
 Michelle Rollins, Revenue Cycle Manager  
 Janka Adams, Revenue Cycle Manager  
 Katherine Thomas, Privacy & Risk Officer  
 Lisa Dyer, Specialty Coding Auditor  
 Danielle M. Desjardins, Coding Specialist  
 Christine Finn-McLaughlin, Chief Financial Officer