

Symphony Provider Directory Roles & Responsibilities

Guide to Medicare Advantage (MA) compliance & how the Symphony Provider Directory will support

The Symphony Provider Directory will make it easier for Medicare Advantage Organizations (MAOs) to achieve compliance with MA and other regulatory requirements through a single, cloud-based portal. Symphony includes functionality that supports many of MA rules and requirements. MAOs remain responsible for achieving full MA compliance.

The Centers for Medicare and Medicaid (CMS) is responsible for ensuring MAOs are compliant with all federal statutes related to provider directories and monitoring MAO directories to ensure they “contain all the information and follow all instructions within the CMS model provider directory.”

Scope (Symphony, Plans, Providers)

✓ Yes

✓ Partially

— No

STATUTE & REGULATION	Function of Symphony	ROLES & RESPONSIBILITIES		
		SYMPHONY	PLAN	PROVIDER
<p>42 CFR § 422.111 (b)(3); CMS Manual System Pub. 100-16 Medicare Managed Care 110.2.1 Ensure that MAO’s online provider directories include information about the number, mix, and distribution of all network providers. Each plan may have separate directories for each geographic area they serve, however all directories together must cover the entire service area.</p>	✓	Support provider information including provider types (e.g. primary care, specialty care), locations and distribution of providers based on CMS specifications	Extract data from Symphony to populate provider directory for MA enrollees at the time of enrollment	Use Symphony to submit all required provider & facility information
<p>42 CFR § 422.111(e) Provide written notification of termination of contracted provider to all current enrollees at least 30 days before termination effective date</p>	✓	Remain plans’ responsibility. Symphony supports functionality to remove contracted provider from MAO plan upon confirmation of contract termination.	Responsible for terminating provider contracts and updating Symphony accordingly	N/A
<p>42 CFR § 422.111(f)(5)(vi) MAOs must disclose the types of providers that participate in the plan’s network and the extent to which an enrollee may select among those providers.</p>	✓	Symphony will support functionality to verify, validate and update the types of providers that participate in the plan’s network	Extract relevant data from Symphony to populate online provider directory, including the types of providers to enrollees	Use Symphony to submit all required provider & facility information
<p>42 CFR § 422.111(f)(10) MAOs must disclose the names, addresses, and phone number of contracted providers from whom the enrollee may obtain in-network coverage in other parts of the service area.</p>	✓	Symphony will support functionality to verify, validate and update in-network provider names, addresses and phone numbers	Extract relevant data from Symphony to populate online provider directory, including in-network provider names, addresses and phone numbers	Use Symphony to submit all required provider & facility information
<p>42 CFR § 422.111(h)(2)(ii) MAOs must have an internet web site that provides information (names, addresses, phone numbers, and specialty) on the network of contracted providers.</p>	✓	Remain plans’ responsibility. Symphony supports functionality to provide information to MAOs to update their internet websites.	Extract the required data from Symphony to populate online directories	Extract the required data from Symphony to populate online directories

Scope (Symphony, Plans, Providers)

✓ Yes

✓ Partially

— No

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<p>CMS Manual System Pub. 100-16 Medicare Managed Care 110.2.2 <i>MAOs are expected to update directory information any time they become aware of changes. All updates to the online provider directories are expected to be completed within 30 days of receiving information. Updates to hardcopy provider directories must be completed within 30 days</i></p>	✓	Support notifications to providers/plans to validate information, facilitate updates; document validation steps and timing	Update online directory within 30 days when informed of a change via Symphony notifications; update hardcopy provider directories within 30 days when informed of a change	Use Symphony to inform contracted plans of any changes
<p>CMS Manual System Pub. 100-16 Medicare Managed Care 110.2.2 <i>MAOs should contact their network/contracted providers on a quarterly basis to update the following information in provider directories:</i> <i>i. ability to accept new patients;</i> <i>ii. street address;</i> <i>iii. phone number; and,</i> <i>iv. any other changes that affect availability to patients.</i></p>	✓	Enable quarterly provider notifications to validate and process updates; generate files to aid updates. Symphony will flag providers that are non-responsive, where necessary, including <i>electronically and via phone.</i>	Extract data from Symphony to update online provider directories quarterly	N/A
<p>CMS Manual System Pub. 100-16 Medicare Managed Care 110.2.2 <i>All providers listed in hard copy or online directories must have current contracts to participate in the MA plan network.</i></p>	✓	Provider contracting remain plans' responsibility. Symphony will support validation of contract status with each MAO and document providers' contract status and expiration date	Responsible for ensuring providers in directories have current contract to participate in MA plan network.	N/A
<p>CMS Manual System Pub. 100-16 Medicare Managed Care 110.2.3 <i>MAOs must make the provider directory available to all enrollees at the time of enrollment, and at least annually thereafter by September 30.</i></p>	✓	Remain plans' responsibility. Symphony supports functionality to provide information to MAOs to update their directories and make them available to enrollees.	Use Symphony to update their online provider directories to all enrollees at the time of enrollment, and at least annually thereafter by September 30	N/A
<p>CMS Manual System Pub. 100-16 Medicare Managed Care 110.2.3 <i>MAOs must send all enrollees either the provider directory in hard copy, or a distinct and separate notice (in hard copy) describing where enrollees can find the provider directories online and how enrollees can request a hard copy.</i></p>	✓	Remain plans' responsibility. Symphony supports functionality to provide information to MAOs to update their directories and make them available to enrollees.	Responsible for providing enrollees with printed directory, or separate notice where enrollees can find online directories, and how they can request a hard copy	N/A
<p>CMS Manual System Pub. 100-16 Medicare Managed Care 110.2.4 <i>MAOs must post a provider directory for all products offered by service areas or by general geographic area.</i></p>	✓	Remain plans' responsibility. Symphony supports functionality to provide information to MAOs to update their directories and make them available to enrollees.	Extract the required data from Symphony to populate online directories for all products offered by service areas or by general geographic area	N/A

Questions? Visit www.symphony.iha.org to sign up for updates or contact to symphonyinfo@iha.org to request more information.

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		SYMPHONY	PLAN	PROVIDER
<p>CMS Manual System Pub. 100-16 Medicare Managed Care 110.2.4 <i>The online provider directory must include a searchable provider directory that represents the complete network for the MAO.</i></p>	✓	Remain plans' responsibility. Symphony supports functionality to provide information to MAOs to update their directories and make them available to enrollees.	Extract the required data from Symphony to populate online directories; ensure information is searchable and represents its complete network	N/A
<p>CMS Manual System Pub. 100-16 Medicare Managed Care 110.2.4 <i>The online provider directory must include individual provider directories by plan product and/or service area.</i></p>	✓	Remain plans' responsibility. Symphony supports functionality to provide information to MAOs to update their directories and make them available to enrollees.	Extract data from Symphony to update online provider directories quarterly; ensure data includes individual provider directories by product and/or service area	N/A
<p>CMS Letter (Apr 4, 2016) <i>CMS encourages the inclusion of the elements listed below in provider directory requirements:</i></p> <ul style="list-style-type: none"> • Machine readable content • Provider medical group • Provider institutional affiliation • Non-English languages spoken by provider • Provider website address • Accessibility for people with physical disabilities 	✓	Symphony will capture listed data elements and support functionality to validate and document updates to provider information. Symphony will ensure all content is machine readable.	Extract the required data from Symphony to populate online directories	N/A
<p>CMS Letter (Apr 4, 2016) <i>The MA program is taking steps to harmonize the requirements across multiple CMS programs. CMS will continue to review and consider additional data elements in the future.</i></p>	✓	Symphony specification will continue to monitor and updates its functionality to comply with MA requirements.	Extract data from Symphony to populate provider directory	N/A

Note: The California Provider Directory Utility (PDU) is now the Symphony Provider Directory (January 2019)

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