14. UTILIZATION MANAGEMENT

A. Utilization Management Delegation and Monitoring

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. IEHP is responsible for the development, implementation, and distribution of standards for Utilization Management (UM) processes and activities to contracted entities delegated to perform UM activities.

1. IEHP and its Delegates are responsible for meeting IEHP UM standards.

2. IEHP and its Delegates are responsible for implementing a process to track open and unused referrals as stipulated in their contract.

B. IEHP is responsible for maintaining a monitoring system for UM Program oversight.

C. IEHP, through its delegation process, is responsible for performing an evaluation of UM Program objectives and progress on an annual basis with modifications, as directed by the Delegation Oversight Committee and IEHP Governing Board.

D. IEHP delegates all or partial UM activities to contracted entities that meet IEHP UM standards with the exception of referrals for foster children in the Open Access program, vision services, and referrals for behavioral health.

E. IEHP and its Delegates must have a UM Plan, UM Policies and Procedures, and perform UM activities in a manner that meets IEHP, Department of Health Care Services (DHCS), Department of Managed Health Care (DMHC), and Centers for Medicare and Medicaid (CMS) standards.

F. IEHP and its Delegates’ Practitioners, and employees/staff who make utilization-related decisions are responsible for identifying barriers to care, instances of under/over utilization of services, and assisting with appropriate use of services.

G. Members are not discriminated against in the delivery of health care services consistent with the benefits covered in their policy based on race, ethnicity, national origin, religion, sex, age, mental or physical disability or medical condition, sexual orientation, medical history, claims history, evidence of insurability (including conditions arising out of acts of domestic violence), disability, genetic information, or source payment.

H. IEHP and its Delegates must have a Second Opinion process in place for Members requesting second opinions and a tracking mechanism for these requests.

I. Provider or Member appeals of UM decisions are handled through the IEHP Provider or Member and grievance and appeal process. Please refer to Section 16, “Grievance and Appeal Resolution System” for more information on Provider and Member grievances.

J. IEHP’s UM staff and physicians are available to respond to Provider inquiries regarding
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authorization requests, status and clinical decisions and processes, Monday through Friday, from the hours 8:00 AM to 5:00 PM.

PURPOSE:

A. To ensure that IEHP and all contracted delegates perform utilization management activities that meet IEHP, Department of Health Care Services (DHCS), Department of Managed Health Care (DMHC), and Centers for Medicare and Medicaid (CMS) standards.

DEFINITION:

A. Delegate – For the purpose of this policy, this is defined as a medical group, IPA, or any contracted organization delegated to provide utilization management (UM) services.

B. Emergency Medical Condition - a medical condition which is manifested by acute symptoms of sufficient severity (including severe pain) such that a prudent layperson who possess an average knowledge of health and medicine, could reasonably expect the absence of immediate medical attention to result in:

1. Placing the health of the individual (or in the case of a pregnant woman, the health of the woman or her unborn child) in serious jeopardy;
2. Serious impairment to bodily function; or
3. Serious dysfunction of any bodily organ or part.

PROCEDURES:

A. UM Standards: IEHP is responsible for defining overall standards for UM activities performed by Delegates. These standards represent the minimum performance level acceptable to IEHP.

B. Criteria: Entities delegated to perform UM must use nationally recognized clinical criteria and/or IEHP UM Subcommittee-Approved Authorization Guidelines, when making decisions related to medical care. Criteria sets approved by IEHP include: CMS Local Coverage Determination and National Coverage Determination, Milliman Care Guidelines, InterQual, Apollo Managed Care Guidelines/Medical Review Criteria, and IEHP UM Subcommittee Approved Authorization Guidelines.

1. Development: Criteria or guidelines that are developed by IEHP and used to determine whether to authorize, modify, or deny health care services are developed with involvement from actively practicing health care Practitioners. The criteria or guidelines must be consistent with sound clinical principles and processes and must be evaluated, and updated if necessary, at least annually.

2. Application: Criteria must be applied in a consistent and appropriate manner based on available medical information and the needs of individual Members. IEHP and its
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Delegates must ensure consistent application of UM Criteria by following this specific order as IEHP or Delegate is licensed to use:

a. Benefits/guidelines for the Member’s line of business (IEHP Member Handbook (EOC)); then

b. CMS guidelines in this order:
   1) Local Coverage Determination;
   2) National Coverage Determination;
   3) Medicare Benefit Policy Manual (100-02); then

c. Evidence-based criteria that were approved by the IEHP Subcommittee for use such as Milliman Care Guidelines, InterQual Guidelines, Apollo Managed Care Guidelines/Medical Review Criteria; then

d. IEHP UM Subcommittee-Approved Authorization Guidelines.

When applying criteria, individual factors such as, age, co-morbidities, complications, progress of treatment, psychosocial situation, and home environment, when applicable are taken into consideration. Additionally, criteria applied takes into consideration the issues of whether services are available within the service area, benefit coverage, and other factors that may impact the ability to implement an individual Member’s care plan. The organization also considers characteristics of the local delivery system available for specific patients, such as:

1) Availability of skilled nursing facilities, subacute care facilities or home care in the organization’s service area to support the patient after hospital discharge;

2) Coverage of benefits for skilled nursing facilities, subacute care facilities or home care, Community Bases Adult Services (CBAS), In-Home Supportive Services (IHSS), Managed Long-Term Services and Support (MLTSS), Multipurpose Senior Services Program (MSSP), or Behavioral Health; and

3) Local in network hospitals’ ability to provide all recommended services within the estimated length of stay.

3. Criteria are presented to the UM Subcommittee for adoption and implementation, after approval by UM Subcommittee it is sent to QM Committee for final approval.

4. Annual Review and Adoption of Criteria: Members of the UM Subcommittee and Practitioners in the appropriate specialty, review clinical criteria annually and update as necessary. New criteria that become available prior to the annual evaluation are reviewed by IEHP’s Chief Medical Officer (CMO) and the Medical Directors and are presented to the IEHP UM Subcommittee for discussion, research, and refinement. Once IEHP’s UM Subcommittee has approved the criteria and updates, the information is disseminated to Providers via letter, website, or email.
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5. **Process for Obtaining Criteria:** The clinical guidelines or criteria used for determining health care services specific to the procedure or condition must be disclosed to network Practitioners, Members, Members representative or the public, upon request.

IEHP or Delegate may distribute the guidelines and any revision through the following methods:

a. In writing by mail, fax, or e-mail; or

b. On its website, if it notifies Practitioners that information is available online.

Member letters must state the address, toll free phone number, and/or TTY/TDD number for obtaining the utilization criteria or benefits provision used in the decision. The following notice must accompany every disclosure of information: “The materials provided to you are guidelines used by the plan to authorize, modify, or deny care for persons with similar illness or conditions. Specific care and treatment may vary depending on individual need and the benefits covered under your health plan”. A log must be maintained of all requests for criteria (See Attachment, “Request for UM Criteria Log” in Section 14). UM staff must be available during normal business hours, Monday through Friday, 8:00 AM to 5:00 PM to answer any UM issues.

6. **Annual Assessment of Consistency of UM Decisions (Inter-rater Reliability):** IEHP and its Delegates are responsible for evaluating, at least annually, the consistency with which all appropriate Practitioners included in utilization review apply appropriate criteria for decision-making. The sample assessed must be statistically valid, or IEHP or Delegate may use one of the following three (3) auditing methods:

a. Five percent (5%) or fifty (50) of its UM determination files, whichever is less;

b. NCQA 8/30 methodology; or

c. Ten (10) hypothetical cases.

7. **Behavioral Health Triage and Referral:** The IEHP Behavioral Health Program is responsible for ensuring triage and referral decisions are made according to protocols that define the level of urgency and appropriate setting of care. Triage and referral protocols utilized must be based on sound clinical evidence and currently accepted practices for behavioral health care service delivery. Please refer to Policy 12D1, “Behavioral Health Services,” for more information.

a. The protocols address the urgency of the Member’s clinical circumstances and define the appropriate care settings and treatment resources that are to be used for behavioral health and substance abuse cases.

b. Triage and referral staff members must utilize protocols and guidelines that are up-to-date and the staff must be provided appropriate education and training regarding their use.

c. Protocols used by staff are reviewed and/or revised annually.
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IEHP DualChoice Members shall access behavioral health services through IEHP’s network of Behavioral Health Providers. Members under the care of a county mental health Provider may continue to receive services through the county. Members can receive services in either county regardless of their county of residence. PCPs or IPAs will refer Members for behavioral health services to the IEHP Behavioral Health Department for triage and referral to an IEHP Behavioral Health Provider by using the “PCP Referral to Behavioral Health Specialist” web form available at www.iehp.org. Urgent or Emergent behavioral health referrals must be “warm transferred” to the IEHP Behavioral Health unit by calling (909) 890-2362.

C. Delegate UM Structure:

1. IEHP and Delegated entities must have the following UM structure and processes in place:
   a. UM Program Description, policies, procedures, and UM activities that meet IEHP and CMS standards. These policies and procedures must ensure that decisions based on the medical necessity of proposed health care services are consistent with sound clinical principles and processes. These policies and procedures must address the Delegate’s responsibility for continuity and coordination of care for Members with medical and/or behavioral health needs. The UM Program must be evaluated, and updated if necessary, at least annually.
   b. IEHP and its Delegates are required to have a procedure in place that will allow Enrollees to initiate requests for provision of services.
   c. Authorization processes for specialty referral, specified diagnostic or therapeutic services, home health, elective surgeries, etc.;
   d. Coordination of care and discharge planning with IEHP UM for inpatient Members as applicable;
   e. Management of out-of-network emergency for Members;
   f. Availability of UM staff, at least eight (8) hours a day during normal business days, to respond to Providers and Practitioners regarding UM issues; and
   g. Process to track open and unused referrals.

2. **IEHP/Delegate UM Medical Director** - There must be a designated physician who holds an unrestricted license in the state of California, responsible for reviewing and monitoring the UM process, including at a minimum, the following activities:
   a. Final decision making on referrals denied or modified for medical necessity;
   b. Requests for out-of-network services must be reviewed based on medical necessity.
   c. Review of modified or denied referrals to assure consistent process and decision making;
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d. Review of internal physician-specific UM data to assess potential over and underutilization of services;

e. Sign-off on all internal policies and procedures related to UM; and

f. Chairing the UM Committee or designating a Chair.

3. IEHP/Delegate UM Committee - Committee membership must include a minimum of three (3) practicing physicians from IEHP or Delegate, representing the appropriate specialties pertinent to IEHP Membership including Obstetrics and Gynecology (OB/GYN), Pediatrics, Family Practice and other specialists, as needed. The UM Committee must meet at least quarterly and perform at a minimum the following activities:

a. Concurrent review of complex referrals requiring multiple physician input;

b. Retrospective review of approved and denied referrals to assess consistency of processes and decisions;

c. Review of physician-specific UM data to assess potential under and over utilization; and

d. Review of appeals or grievances related to UM decisions, as needed, with referral to QM or Peer Review Committee as appropriate.

4. IEHP/Delegate UM Program Description must include:

a. Mission statement, goals, and objectives;

b. Designated standards used for determination of medical necessity that meet IEHP requirements;

c. Authorization process, in detail, including staffing and Compliance mandated turnaround timeframes;

d. Evidence of full range of UM activities;

e. UM Committee meeting frequency;

f. UM Committee chairperson and membership including a rotation policy;

g. Documentation of ability to collect and report all required UM data;

h. Delineation of timeframes for approval or denial of referrals that meet IEHP and regulatory standards;

i. Denial process that includes letters to Members and Practitioners;

j. Procedures for informing Practitioners of referral process; and

k. Dissemination of summary UM data to Practitioners.

5. Network Practitioner Responsibilities: Network Practitioners are required to follow established UM procedures for authorization that include:
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   a. Providing sufficient information for decision-making; and
   b. Following IEHP or Delegate’s directions for initiating the UM process.

D. Use of Appropriate Professionals for UM Decisions: To ensure that first-line UM decisions are made by individuals who have the knowledge and skills to evaluate working diagnoses and proposed treatment plans, IEHP has adopted standards for personnel making review decisions and reviewing denials. The following types of personnel can perform the functions listed:

   1. For medical decisions:
      a. UM Technicians/Coordinators – eligibility determination, editing of referral form for completeness, interface with Practitioner office to obtain any needed non-medical information and approval of authorizations as determined appropriate (auto authorizations). Delegates should be able to provide a list of all services approvable by the UM Technician/Coordinator.
      b. RN/LVN – initial review of medical information, initial determination of benefit coverage, obtaining additional medical information, as needed, from the Practitioner’s office, approval of criteria-based referrals.
      c. A physician must supervise review processes and decisions.
      d. A designated California licensed physician (with an unrestricted license) must review all the denials for medical necessity and obtain additional medical information from treating physician, as needed within the required timeframes. A designated Board-Certified physician in the appropriate specialty must be consulted to review all applicable denied referrals and approve complex referrals, as needed.
      e. Compensation arrangements for individuals who provide utilization review services must not contain incentives, direct or indirect, to make inappropriate review decisions. If incentives are used, IEHP or Delegate must demonstrate that there is a mechanism in place to ensure that all decisions are based on sound clinical judgment.
      f. IEHP and its Delegates that utilize referral decision-making and hospital length of stay information for economic profiling must provide documentation to their PCPs and IEHP, if requested.

   2. Use of Board-Certified Physicians for UM Decisions: IEHP and its Delegates use designated physicians with current unrestricted license for UM decisions. When a case review falls outside the clinical scope of the reviewer, or when medical decision criteria do not sufficiently address the case under review, a Board-Certified physician in the appropriate specialty must be consulted.
      a. IEHP and its Delegates are required to have a written policy and procedure in place that addresses the process for the use of Board-certified Specialists for UM decisions.
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b. IEHP and its Delegates are required to either maintain lists of Specialists to be utilized for UM decisions, or consult with an organization contracted to perform such review. The interaction can be completed by a telephone call to a network specialist, a written request for review, or use of a contracted vendor that provides Board Specialist review.

c. The primary physician reviewer determines the type of specialty required for consultation.

d. IEHP maintains a contract with one (1) or more external review companies, for specialty consultation.

E. Authorization, Inpatient Review, and Notification Standards: There must be written policies and procedures regarding the process to review, approve, modify or deny prospective, concurrent, or retrospective requests by Providers or Practitioners concerning the provision of health care services for Members. These policies and procedures must be available to the public upon request. See Policy 11B, “Exception Requests for Formulary and Non-Formulary Drug,” for further details regarding pharmaceutical pre-authorization guidelines.

1. Communication Services: IEHP and its Delegates must provide access to staff for Members and Practitioners seeking information about the UM Process and the authorization of care. This includes the following:

   a. IEHP and Delegate UM staff are available at least eight (8) hours a day during normal business hours for inbound collect or toll-free calls regarding UM issues;

   b. Outbound communication from staff regarding inquiries about UM during normal business hours;

   c. Staff identify themselves by name, title, and organization when initiating or returning calls regarding UM issues;

   d. Staff can receive inbound communication regarding UM issues after normal business hours;

   e. Staff are accessible to callers who have questions about the UM process; and

   f. IEHP and its Delegates are responsible for assuring TDD/TTY services for the deaf, hard-of-hearing, or speech impaired, and language assistance are available to all IEHP Members. IEHP will audit to assure that all policies and procedures state that IEHP and its Delegates have these services in place.

2. Authorization and Notification for Referrals or Services: Authorization and notification of decision for proposed services, referrals, or hospitalizations at the Practitioner level involves utilizing information such as medical records, test reports,
specialist consults, and verbal communication with the requesting Practitioner in the review determination. Part of this review process is to determine if the service requested is available in network, and to ensure coordination of medically necessary care from the non-network specialist. If the service is not available in network, arrangements are made for the Member to obtain the service from an out-of-network Provider for this episode of care. Prior authorization for all outpatient services and elective admissions should take place at an IEHP network facility.

When an outpatient/inpatient service requested appears to be unavailable within the IEHP network and IEHP is responsible for paying for the facility charges, the Delegate must review the request to determine if the request meets criteria. Once the Delegate determines that criteria is met, the clinical information must be sent to IEHP to make the final decision. If IEHP determines the requested service cannot be provided within the network, IEHP will initiate the Letter of Agreement (LOA) process. It is therefore critical that the Delegate fax the referral with all supporting documentation as soon as possible to (909) 890-5751 to prevent a possible delay of care. If the request can be handled within the network or does not meet the criteria, the Delegate can modify or deny as appropriate.

a. Prior Authorization of Non-Urgent Pre-Service and Concurrent Organization Determinations:

1) The prior authorization process is initiated when the Member, Member’s representative, or the Member’s physician requests a referral or authorization for a procedure or service with the exception of emergent services.

2) The timeframes for completion and adjudication of the referral are as follows:
   - Practitioners have two (2) working days from the determination that a referral is necessary to submit the referral and all supporting documentation. Practitioners must sign and date the referral and provide a direct phone number and fax number to the referring physician for any questions or communication regarding the referral.
   - The decision to approve, modify, or deny, must be made according to industry standards. For more information, please see Policy 14E, "Pre-Service Referral Authorization Process". For Members with Dual coverage, the primary insurance will determine the decision timeframe. (See Attachment, “Utilization Management Timeliness Standards – IEHP DualChoice” in Section 14).

Delegate will identify upon intake any prior authorization request in which the Health Plan is responsible for making a determination (including requests for behavioral health, optometry and general anesthesia for routine dental requests) and will ensure this request is forwarded to the health plan within twenty-four (24) hours of receipt by faxing the request to (909) 890-5751.
The timeframe begins from receipt of the request. If information necessary to make a determination is not available with the referral, the requesting Practitioner must be contacted preferably by telephone for the additional clinical information. The request for additional information must be annotated and must include the date of the request.

- All referrals should be processed as expeditiously as the Member’s health condition dictates, based on the reviewer’s clinical judgment.
- Members and Practitioners must be initially notified within fourteen (14) calendar days of receipt of request electronically or telephonically. Telephonic communications of decisions must be documented including date, time, name of contact person, and initials of person making the call, with each attempt.

b. Prior Authorization for Expedited Initial Organization Determinations (EIOD) and Urgent Concurrent:

1) Urgent/EIOD or concurrent pre-service decisions are required if:

   - Delay could seriously jeopardize the life or health of the Member or the Member’s ability to regain maximum function, based on a prudent layperson’s judgment; or
   - In the opinion of a Practitioner with knowledge of the Member’s medical condition, would subject the Member to severe pain that cannot be adequately managed without the requested care or treatment.
   - The following requests should be classified as concurrent: Continued Home Health, Physical Therapy (PT), Speech Therapy (ST), Occupational Therapy (OT) and Durable Medical Equipment (DME) when the original preservice authorization has not expired.

2) Prior authorization is not required for services necessary to treat and stabilize an emergency medical condition. Please see Policy 14D, "Emergency Services," for more information.

3) The Member, Member designee or the Practitioner on behalf of the Member may initiate an EIOD.

4) Practitioners must submit urgent referrals the same day of the determination that the referral is necessary. Decisions to approve, modify, or deny regarding prior authorization must be made according to industry standards (See Attachment, “UM Timeliness Standards – IEHP DualChoice” in Section 14).

5) The timeframe begins from the time and date the request is received. If information reasonably necessary to make a determination is not available with the referral, the requesting Practitioner should be contacted for the additional clinical information preferably by telephone at least two (2) times and if no documentation received a final call to the Provider from a Medical Director is
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required. The request for additional information must be annotated and must include the date of the request.

6) Members and Practitioners must be initially notified within seventy-two (72) hours after receipt of request. Telephonic communications of decisions must be documented including date, time, name of contact person, and initials of person making the call, with each attempt.

7) Both the Member and Practitioner must be notified of all decisions in writing, within seventy-two (72) hours from receipt of the request. If the Member receives oral notification within seventy-two (72) hours of the receipt of the request, written or electronic notification must be given no later than three (3) calendar days after the initial oral notification.

8) The Delegate must notify both the Practitioner and Member utilizing the IEHP approved “Integrated Denial Notice” template with all denials that instructs a Member or Member representative on the appeal/grievance process. These IEHP-approved notification templates are available online at: https://ww3.iehp.org/en/providers/forms/um-forms/mmp/.

c. Post-Service Organization Determinations (Retrospective Review):

1) Services rendered without prior authorization require retrospective review for medical necessity and/or benefit coverage. This can include out-of-area admissions and/or services or treatments rendered by a contracted or non-contracted Practitioner/Provider without prior authorization.

2) Relevant clinical information must be obtained and reviewed for medical necessity based on approved clinical criteria. If medical necessity is not met, denial determinations must be made by the IEHP or Delegate Medical Director.

3) Retrospective review decisions and written notification to the Member and Practitioners must be made within thirty (30) days from receipt of the request.

4) Members do not need written notification of the decision in the following situations:
   - Retrospective review is only to determine payment level; or
   - The Member is not at financial risk.
   [For example, a retrospective billing adjustment of an Emergency Department visit does not require Member notification because the services have already been rendered, the Member is not financially impacted by the decision (being dual eligible), and payment must be made for the medical screening exam (MSE)]

d. Experimental and Investigational Determinations:

1) The determination for all experimental and investigational services is the responsibility of IEHP. The Delegate must send to IEHP all authorization
requests for experimental/investigational services as soon as possible after receipt. This must be sent by facsimile to IEHP, attention Medical Director at fax number (909) 890-5751, using the Health Plan Referral Form for Out-of-Network and Special Services (See Attachment, “Health Plan Referral Form for Out-of-Network and Special Services” in Section 14). The request must include all supporting clinical information including diagnosis (ICD codes) and procedure (CPT) codes. IEHP is responsible for decision-making and notifying the Provider, Member and Delegate of the determination, per standard timeframes for level of urgency.

e. **Denial Notices:** Medical necessity denials, in whole or in part, of a requested health care service must be reviewed and approved by the IEHP or Delegate UM Medical Director, physician designee, or UM Committee. Members must receive an approved Integrated Denial Notice (IDN) letter for any requested referral that is denied or partially approved (modified) with instructions on the appeal and grievance process. IEHP or Delegate is responsible for notifying Members of the reason for denial and citing the criteria or benefit coverage information used to render the decision. Any denial notices regarding experimental and investigational therapy are the responsibility of IEHP, as stated above.

f. **Denial letters must include the following** (IEHP approved notification templates are available online at: https://ww3.iehp.org/en/providers/forms/um-forms/mmp/):

1) Required CMS denial language (utilizing only approved CMS denial letter templates);

2) Be typed in 12-point font and written in a manner, format, and language that can be easily understood;

3) Be made available in English & Spanish (IEHP Threshold Languages), upon request;

4) Include information about how to request translation services and alternative formats. Alternative formats shall include materials which can be understood by persons with limited English proficiency and;

5) Any written communication to a physician or other health care Provider of a denial, delay, or modification of a request, include the name and telephone number of the health care professional responsible;

6) Sixth (6th) grade level language appropriate for the Member population describing the reason for the denial;

   - Medical necessity denials must cite the criteria used and the reason why the clinical information did not meet criteria;
   - The beginning sentence of every denial reason should be “Based on your IEHP DualChoice CalMediConnect Plan benefit or IEHP DualChoice Plan
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benefit” as applicable depending on the Member’s line of business on the date of the decision; and

• Non-covered benefit denials must cite the specific provision in the Evidence of Coverage (EOC) that excludes that coverage or the IEHP Member Handbook, CMS guideline or State/Federal regulations; and Information on how the Member and Practitioner can obtain the utilization criteria or benefits provision used in the decision.

6) Information for the Member regarding alternative treatment and direction for follow-up care; and

7) Information on how to file an oral or written expedited grievance, file a standard or fast appeal, or file an immediate review or appeal as applicable.

The Delegate must have in place Quality Assurance (QA) procedures that monitor the items listed above. IEHP will monitor on a monthly basis through the Monthly Service Authorization Requests, Appeals and Grievances (SARAG) Standard Organization Determination (SOD) Universe and SARAG Expedited Organization Determination (EOD) Universe report. (See Attachment, “SARAG Universe SOD and EOD Claims Data Dictionaries” in Section 21). The QA process will check for deficiencies in the medical rationale for the denial, the clarity of the language and the inclusion of correct information in the letter.

g. The written communication to a Practitioner of a denial based on medical necessity must include the name and telephone number of the UM Medical Director or physician designee responsible for the denial. This communication must offer the requesting Practitioner the opportunity to discuss any issues or concerns regarding the decision within seventy-two (72) hours of the initial notification of the denial or modification. This written notification of denial or modifications must include language informing the Practitioner of their right to appeal the decision to the Delegate’s Medical Director, IEHP Chief Medical Officer, or IEHP Medical Director.

1) If the Practitioner chooses to appeal the denial or partial approval (modification) to the Delegate and the Delegate upholds the original decision, the written communication must inform the Practitioner of their right to submit a formal appeal to the IEHP Grievance and Appeals Department.

2) If the Delegate upholds the denial or partial approval (modification) of an urgent referral, the Delegate must send all information to IEHP’s Medical Director for review, no later than one (1) business day following the decision to uphold the denial or partial approval (modification).

h. On a monthly basis, for monitoring purposes, as outlined in Policy 14I, “Utilization Management Reporting Requirements,” the Delegate must send IEHP all documentation for each denial including the following:

1) Denial log;
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2) Letters and attachments;
3) Clinical documentation;
4) Referral;
5) Outreach/call logs, if any
6) Supporting evidence of the following:
   • Received Date;
   • Decision Date;
   • RN/LVN or Physician Reviewer note from medical management system; and
   • Proof of date/time letter was mailed to the Member.
7) Criteria used for the determination; and
8) Initial notification including opportunity to discuss.

i. IEHP and its Delegates shall retain information on decisions, i.e., authorizations, denials, appeals, grievances, or modifications for a minimum period of ten (10) years.

j. For Delegates responsible for Medicare benefit only:
   1) If a service request is covered by both Medicare and Medi-Cal, and does not meet Medicare criteria, but does meet Medi-Cal criteria, no denial letter is issued prior to forwarding to Health Plan (refer to Procedure E.2.a).
   2) If a service request is not a covered benefit under Medicare, but is a covered benefit under Medi-Cal, no Medicare denial letter is needed prior to forwarding to Health Plan (refer to Procedure E.2.a).

k. Exceptions: Prior authorization is not required for the following services:
   1) Family Planning;
   2) Abortion Services;
   3) Sexually transmitted infection (STI) treatment;
   4) Sensitive and Confidential Services;
   5) HIV testing and counseling at the Local Health Department;
   6) Immunizations at the Local Health Department;
   7) Routine OB/GYN services, including prenatal care by Family Care Practitioner (credentialed for obstetrics) within the IEHP network;
   8) Out of area renal dialysis
   9) Urgent Care
   10) Preventative services; and
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11) Other services as specified by CMS

3. **Emergency Services:** Prior authorization is not required for the medical services necessary to treat and stabilize a life-threatening emergency. Please see the Definitions section for the plan’s definition of an “emergency medical condition.”

For further details see Policy 14D, “Emergency Services.” All emergency care costs are covered.

4. **Standing Referrals:** IEHP and its Delegates are required to have procedures by which a PCP may request a standing referral to a specialist for a Member who requires continuing specialty care over a prolonged period of time or an extended referral to a specialist for a Member who has a life threatening, degenerative, or disabling condition that requires coordination of care by a specialist. IEHP and its Delegates must have a system in place to track open, unused; and standing referrals/Members and must authorize care for a three to six (3-6) month period. For more information, please see Policy 14B.1, "Review Procedures - Primary Care Physician (PCP) Referrals”.

5. **Behavioral Health:** Behavioral Health benefits for IEHP DualChoice Members are obtained through the IEHP Behavioral Health Program.

6. **Vision Services:** Vision is not a Medicare benefit unless specifically for covered lenses post cataract surgery. IEHP DualChoice Members may have additional limited benefits through Medi-Cal.

7. **Pharmacy Services:** Please refer to the Division of Financial Responsibility (DOFR) in your contract regarding pharmacy services.

8. **Supplemental Benefits:** Supplemental benefits may vary and are the responsibility of the Health Plan. Please refer to IEHP’s website for a list of current benefits.

F. **IEHP and Delegate UM Requirements** – The following requirements for UM processes must be met:

1. **Services Requiring Prior Authorization:** IEHP and its Delegates must maintain a list of services that require prior authorization or a list of services that do not require prior authorization.

2. **Medical Necessity Determination:** Medical necessity determinations for a specific requested service is as follows:
   a. Utilize a definition for medical necessity which includes all health care services necessary for the diagnosis and/or treatment of a medical condition causing significant pain, negative impact on the health status of the Member, potential disability or is potentially life threatening;

   b. If information reasonably necessary to make a determination is not available with the referral, the requesting Practitioner should be contacted for the additional clinical information by telephone at least two (2) times and with a third attempt being made by a Medical Director;
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A. Utilization Management Delegation and Monitoring

c. Employ IEHP approved UM standards including Milliman Care Guidelines, InterQual, IEHP UM Subcommittee Approved Authorized Guidelines, and Apollo Managed Care Guidelines/Medical Review Criteria;

d. Consider all factors related to the Member including barriers to care related to access or compliance, impact of a denial on short and long term medical status of the Member and alternatives available to the Member if denied; and

e. Obtain input from specialists in the health care services requested either through a UM Committee member, telephonically, or with an outside consultant.

3. Denials because the requested service or procedure is not a covered benefit: The IEHP Provider Manual and other supporting regulations must be utilized to determine if a requested service or procedure is a covered benefit. Denial letters must cite the specific non-covered benefit.

4. Denial due to lack of documentation: IEHP and its Delegates must include in the denial letter to the Member and Provider the specific clinical criteria necessary to meet the requirements (e.g. diagnosis, labs, premiums, treatments, etc.).

5. Referral Requests: The PCP provides general medical care for Members. Referral to specialists, or authorization for procedures, services, or hospital admissions, should be initiated by PCPs through the Member’s delegated IPA. Specialists caring for Members can request referrals directly from the delegate IPA.

G. Documentation of Medical Information and Review Decisions: IEHP and its Delegates must base review decisions on documented evidence of medical necessity provided by the attending physician. Regardless of criteria, the Member’s condition must always be considered in the review decision.

1. Physician Documentation: Attending physicians must maintain adequate medical record information to assist the decision-making process. The PCP or Specialist must document the medical necessity for requested services, procedures, or referrals and submit all supporting documentation with the request.

2. Reviewer Documentation: IEHP and Delegate reviewers must abstract and maintain review process information in written format for monitoring purposes. Documentation must be legible, logical, and follow a case from beginning to end. Rationale for approval, modification or denial must be a documented part of the review process. Decisions must be based on clinical information and sound medical judgment with consideration of local standards of care.

3. Documentation: IEHP and its Delegates must have procedures in place to log requests by date and receipt of information so that timeframes and compliance with those timeframes can be tracked. IEHP and Delegate documentation of authorizations or referrals must include, at a minimum: Member name and identifiers, description of service or referral required, medical necessity to justify service or referral, place for service to be performed or name of referred physician, and proposed date of service.
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A. Utilization Management Delegation and Monitoring

IEHP and Delegate documentation must also include a written assessment of medical necessity, appropriateness of level of care, and decision. Any denial of a proposed service or referral must be signed by IEHP or Delegate UM Committee, Medical Director, or physician designee. Written notifications to a Practitioner of a denial must include the name and telephone number of the UM Medical Director or physician designee responsible for the denial.

4. **Affirmative Statement Regarding Incentives:** UM decisions for Members must be based only on appropriateness of care and existence of coverage. IEHP and its Delegate do not provide compensation for Practitioners or other individuals conducting utilization review for issuing denials of coverage or service. IEHP and its Delegates ensure that contracts with physicians do not encourage or contain financial incentives for denial of coverage or service that result in underutilization. The Affirmative Statement about incentives is distributed annually to all Practitioners, Providers, employees and Members.

5. **Prohibition of Penalties for Requesting or Authorizing Appropriate Medical Care:** Physicians cannot be penalized in any manner for requesting or authorizing appropriate medical care.

6. **Inpatient Stay:**
   a. Determine medical necessity.
   b. Determine appropriate level of care.
   c. Coordinate with hospital Case Manager discharge plan.

7. **Discharge Planning:** The UM process must include the following activities related to discharge planning:
   a. Determining level of care (SNF, office visit, home health, home without services);
   b. Arranging necessary follow-up care (home health, follow-up PCP or specialty visits, etc); and
   c. Facilitating transfer of the discharge summary and/or medical records, as necessary, to the PCP office.

8. **Out-of-Network Management:** IEHP and its Delegates must assist with the transfer of Members, as medically appropriate, back into the IEHP network.

9. **Review of UM Data:** IEHP and its Delegates must collect, report, and analyze UM data related to Members for potential over or under utilization.
   a. UM data includes, at a minimum, the following:
      1) Enrollment;
      2) Re-admits within thirty (30) days of discharge;
      3) Total number of prior authorization requests;
A. Utilization Management Delegation and Monitoring

4) Total number of denials;
5) Denial percentage; and
6) Emergency encounters.

b. Presentation of above data in summary form to IEHP or Delegate’s UM Committee for review and analysis at least quarterly upon receipt of necessary information;
c. Presentation of selected data from above to PCPs, specialists, and/or Hospitals as a group, e.g., Joint Operations Meetings (JOMs), or individually, as appropriate; and
d. Evidence of review of data above by the Delegate’s UM Committee for trends by physicians for both over-utilization and under-utilization.

H. Appeals and Grievance Non-Urgent Process: IEHP maintains a formal Appeals and Grievance Resolution System to ensure a timely and responsive process for addressing and resolving all Member appeals and grievances. IEHP acknowledges and resolves UM related appeals and grievances in accordance with state and federal regulatory guidelines. The Member may file an appeal or grievance by phone, by mail, fax, website, or in person. IEHP resolves Member appeals and grievances within industry standard time frames. Please refer to Section 16 of this manual, “Grievance Resolution System”.

I. Second Opinions: Members, PCPs and specialists have the right to request a second opinion regarding proposed medical or surgical treatments from any participating Practitioner within their IPA’s network. Second opinions are authorized and arranged through the authorization system. In cases in which the Member faces imminent and serious threat to his/her health, including but not limited to the potential loss of life, limb, or other major bodily function, or lack of timeliness that would be detrimental to the Member’s ability to regain maximum function, decisions and notification of decisions to Member and Practitioner are completed in a timely fashion not to exceed seventy-two (72) hours after receipt of request. If the referral for a second opinion is approved, arrangements must be made for the Member to see a physician in the appropriate specialty. If the referral is denied, written notification must be sent to the Member including rationale for the denial. Members disagreeing with a denial of a second opinion may register an appeal through IEHP’s appeal and grievance process. Refer to Policy 14C, “Second Opinions” for more information.

J. New Technology: At least annually, the IEHP UM Subcommittee is responsible for reviewing new medical technologies and new applications of existing technologies for potential addition as a medical benefit for Members. The IEHP Chief Medical Officer or Medical Director will identify and research new technology and new applications of existing technologies, including medical procedures, treatment, and devices. Research and investigation includes review of scientific information, such as ECRI’s Health Technology Information Services, and review of regulatory body publications from such agencies. Information is then presented to the UM Subcommittee regarding the technology/product, its scope and limitations. The UM Subcommittee obtains an opinion from an appropriate specialist physician whenever necessary to assist in the decision regarding coverage of a
new technology as a covered benefit for Members. Once approved by the UM Subcommittee, the IEHP Chief Medical Officer/IEHP Medical Director presents the new benefit/service, including scope and limitations, to the IEHP QM Committee for approval.

K. **Satisfaction with the UM Process:** At least annually, IEHP performs Member and Physician Satisfaction Surveys as a method for determining barriers to care and/or satisfaction with IEHP processes including UM.

L. **Delegated UM Responsibilities:** IEHP delegates all aspects of UM activities related to medical services for assigned Members to Delegates. All medical services are arranged for or provided by professional personnel and at physical facilities according to professionally recognized standards of medical practice and healthcare management. Delegate medical services must be rendered by qualified medical Practitioners, unhindered by fiscal and administrative management. All contracted Delegates must further agree to provide or arrange for referrals to specialists and facilities as are necessary, appropriate, and in accordance with generally accepted managed care industry standards of medical practice, in compliance with the standards developed by IEHP and NCQA.

M. **Non-Delegate UM Responsibilities:** IEHP retains responsibility for select UM activities for non-covered benefits, authorizations for vision services, pharmacy services and behavioral health authorizations. authorization medical management system is maintained by IEHP to accommodate authorizations by IEHP for services that are not covered under the Medicare contract but are authorized by the IEHP Chief Medical Officer or Medical Director. Examples include special lenses, abortions under special circumstances, or special referrals/treatment out-of-network.

N. **Monitoring Activities and Oversight of Delegate:** IEHP monitors and oversees delegated UM activities performed by the Delegates. The following oversight activities are performed to ensure compliance with IEHP UM and regulatory standards:

1. **Delegate and Hospital Contracts** – The IEHP Agreements contain language that designates compliance requirements for participation in an ongoing utilization management program to promote efficient use of resources.

2. **Analysis of Provider Data Reports** – Through its delegation oversight process, IEHP reviews health plan and delegate reports and utilization data including denial and approval universes and letters, Readmissions, annual & semi-annual work plan. Provider reports and utilization data is subsequently reviewed by the Delegation Oversight Committee (DOC).

3. **Review of SARAG Approval and Denial Universe Pre-Service Reports and Letters** – All Delegates are required to submit monthly Service Authorization Requests, Appeals and Grievances (SARAG) Standard Organization Determination (SOD) Universe and SARAG Expedited Organization Determination (EOD) Universe report to IEHP listing the approved and denied referrals, clinical information, and denials and modifications of referrals from the previous month. Thirty (30) Denial files including partial approvals (modifications) from the previous month are randomly selected from
the monthly denial log. On a monthly basis, ten (10) Approval files are randomly selected from the monthly SARAG report. Delegates are required to submit copies of all denial letters sent to Members and Practitioners. If the Practitioner appeals a denial to the Delegate, and the Delegate upholds the decision, the notification letter sent to the Practitioner, regarding the upheld decision, must be submitted to IEHP with the monthly submission of denials. All denials are reviewed for appropriateness by the IPA Audit Nurse and Delegation Oversight Manager.

4. **Focused Referral and Denial Audits** – IEHP performs focused audits of the referral and denial process for Delegates. Please refer to policy 14H, “Referral and Denial Audits.” Audits examine source data at the Delegate to determine referral process timelines and appropriateness of denials and the denial process, including denial letters.

5. **Member or Practitioner Grievance Review** – IEHP performs review, tracking, and trending of Member or Practitioner grievances and appeals related to UM. IEHP reviews individual grievances and recommended resolutions for policies, procedures, actions, or behaviors that could potentially negatively impact Member health care.

6. **Delegation Oversight Audits (DOA)** – IEHP performs monthly monitoring and auditing and the annual onsite Medical Management audits of all Delegates to review UM process, policies and procedures that includes approved referral audit and non-emergent file review.

7. **Joint Operations Meetings (JOMs)** – JOMs are intended to provide a forum to discuss issues and ideas concerning care for Members. JOMs are held with Hospitals and Delegates to address specific Provider Services, UM, QM, CM, grievance, study results, or any other pertinent quality issues. These meetings are designed to address issues from an operational level.

O. **Confidentiality**: IEHP recognizes that Members’ confidentiality and privacy are protected. It is the policy of IEHP and Delegates to protect the privacy of individual Member health information by permitting UM staff to obtain only the minimum amount of Protected Health Information (PHI) necessary to complete the healthcare function of activity for Member treatment, payment or UM operations.

P. **Enforcement/Compliance**: IEHP monitors and oversees delegated UM activities performed by Delegates. Enforcing compliance with IEHP standards is a critical component of monitoring and oversight of IEHP Providers, particularly related to delegated activities.
14. UTILIZATION MANAGEMENT

A. Utilization Management Delegation and Monitoring

REFERENCE:

A. Coordinated Care Initiative (CCI) Three-Way Contract, Section 2.11, eff January 1, 2018.
14. UTILIZATION MANAGEMENT

B. Review Procedures
   1. Primary Care Physician (PCP) Referrals

**APPLIES TO:**

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

**POLICY:**

A. IEHP delegates the responsibility for providing general medical care for Members to Primary Care Physicians (PCPs).
B. PCPs are responsible for requesting specialty care, diagnostic tests, and other medically necessary services through their Delegated entity’s referral process.
C. Delegates are responsible for the processing, tracking, and reporting of referrals as specified by IEHP.

**DEFINITION:**

A. Delegate – For the purpose of this policy, this is defined as a medical group, IPA, or any contracted organization delegated to provide utilization management (UM) services.

**PROCEDURES:**

A. Referrals to Specialists, second opinions, elective hospital admissions, or any services which require prior authorization are initiated by PCPs or Specialists through IEHP or their Delegate for delegated services. Prior authorization for proposed services, referrals, or hospitalizations involve the following:
   1. Verification of Member eligibility by the delegated entity;
   2. Written documentation by the PCP or Specialist of medical necessity for a service, procedure, or referral;
   3. Verification by the delegated entity that the place of service, referred to Practitioner, or Specialist is within the IEHP network; and
   4. Assessment of medical necessity and appropriateness of level of care with determination of approval or denial for the proposed service or referral.

B. PCPs must maintain a Referral Tracking Log for all referrals submitted to IEHP or their Delegate for approval in accordance with Policy 14B1a, “Review Procedures – Primary Care Physician (PCP) Referral - PCP Referral Tracking Log.” The prior authorization/referral process must meet all standards, including timeliness, as delineated in Policy 14A, “Utilization Management Delegation and Monitoring.” The Referral Tracking Log is reviewed and monitored during Facility Site Review, Medical Record
B. Review Procedures

1. Primary Care Physician (PCP) Referrals

Review Survey and Interim Audits, or as required in accordance with Policy 7A, “PCP and IPA Medical Record Requirements”.

C. For expedited referrals, Member should receive notice of decision within seventy-two (72) hours of receipt of request. For routine referrals, Member should receive notice of decision within fourteen (14) calendar days.

D. The PCP informs Members that if the referral is denied or modified, they can file an appeal or grievance with IEHP. A written notice of denial must be provided through the Delegate that includes the appeal and grievance process.

E. Referrals to specialists or out-of-network practitioners require documentation of medical necessity, rationale for the requested referral, and prior authorization from IEHP or the delegate. Once the prior authorization has been obtained, the PCP must continue to monitor the Member’s progress to ensure appropriate intervention and assess the anticipated return of the Member to the IEHP network.

F. Members requiring special tests/procedures or referral to a Specialist may have to obtain prior authorization through IEHP or the delegate.

1. Each Specialist provides written documentation of findings and care provided or recommended to the PCP within two (2) weeks of the Member encounter.

2. The PCP evaluates the reports information, initials and dates the report once reviewed, and formulates a follow-up care plan for the Member. This follow-up plan must be documented in the Member’s medical record.

3. The presence of specialist reports on the PCP’s medical records is assessed during periodic chart audits by IEHP.

G. Denial logs and letters for in-network and out-of-network denials and modifications must be maintained by the delegate. Denial logs and letters must be sent to IEHP on a monthly basis for monitoring purposes. Information on the denial logs must include at a minimum: Member name, IEHP number, requesting physician name, date of referral or request, the specifics of referral or request, diagnosis, decision by delegate [approval, denial, or partial approval (modification) specifics], alternatives offered and date of decision. Please see Policy 14I, “Utilization Management Reporting Requirements” for more information.

H. IEHP reserves the right to perform site audits or to verify accuracy of information on referral logs by examining source information.

I. Please refer to Policies 12D1, “Behavioral Health - Behavioral Health Services” and 12D2, “Behavioral Health - Alcohol and Drug Treatment Services” for more information on the referral process for behavioral health services.
14. UTILIZATION MANAGEMENT

B. Review Procedures
   1. Primary Care Physician (PCP) Referrals
14. UTILIZATION REVIEW

B. Review Procedures
   1. Primary Care Physician (PCP) Referrals
      a. Referral Tracking Log

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. All Primary Care Physicians (PCPs) are required to maintain a system for tracking all referrals submitted to IEHP.

PROCEDURES:

A. All PCPs must maintain a referral log that contains all of the information noted below:
   1. IPA authorization/tracking number;
   2. Member name;
   3. Member IEHP ID number;
   4. Member date of birth;
   5. Acuity of referral (Expedited, Concurrent Expedited, Standard, or Retrospective);
   6. Reason for referral or diagnosis;
   7. Service/Activity requested;
   8. Date referral returned;
   9. Requesting Provider;
   10. Requested Provider;
   11. Requesting Provider specialty; and
   12. Referral decision.

B. PCPs may either use the IEHP Referral Tracking Log (See Attachment, “Referral Tracking Log” in Section 14) or another system that contains all of the above-required information.

C. PCPs must utilize the referral log to coordinate care for the Member, to obtain assistance from IEHP if specialty appointments are delayed, or consultation notes are not received.

D. Referral logs, or equivalent system, must be available at all times at the PCP site.

E. Copies of referrals and any received consultation and/or service reports must be filed timely in the Member’s medical record.
14. UTILIZATION REVIEW

B. Review Procedures
   1. Primary Care Physician (PCP) Referrals
      a. Referral Tracking Log
14. UTILIZATION MANAGEMENT

B. Review Procedures

2. Standing Referral/Extended Access to Specialty Care

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. IEHP and its Delegates are required to establish and implement procedures for Primary Care Physicians (PCPs) to request a standing referral to a specialist for a Member who, as a component of ongoing ambulatory care, requires continuing specialty care over a prolonged period of time, or extended access to a specialist for a Member who has a life threatening, degenerative, or disabling condition that requires coordination of care by a specialist.

B. Members with a life-threatening, degenerative or disabling condition or disease must receive a referral to a specialist or specialty care center that has expertise in treating the condition or disease for the purpose of having the specialist or specialty care center coordinate the Member’s care.

C. Practitioners that are Board-Certified in appropriate specialties, e.g., Infectious Disease, are able to treat conditions or diseases that involve a complicated treatment regimen that requires ongoing monitoring. Board certification is verified during the Provider credentialing process. Members may obtain a list of Practitioners who have demonstrated expertise in treating a condition or disease involving a complicated treatment regimen that requires ongoing monitoring by contacting IEHP at (877) 273-4347 or for TTY (800) 718-4347.

D. PCPs are responsible for coordinating the care of the Member in consultation with the specialist, Delegated entity and the Member.

DEFINITION:

A. Delegate – For the purpose of this policy, this is defined as a medical group, IPA or any contracted organization delegated to provide Utilization Management (UM) services.

PROCEDURES:

A. IEHP and its Delegates must develop and implement a procedure for standing referrals or extended access to a specialist at the Member or PCP request. The PCP and/or Member determines, in consultation with the Specialist and the Medical Director or designee, if a Member needs continuing care from a specialist.
B. After consultation with the specialist as needed and the Medical Director, the PCP must submit his/her request for a standing specialty referral or extended access to IEHP or Delegate in writing, using the designated form (See Attachment, “Standing Referral/Extended Access to Specialty Care” in Section 14). Appropriate medical records must be attached to the request.

C. Standing referrals are processed according to turnaround timeframes as outlined in Policy 14A, “Utilization Management Delegation and Monitoring”.

D. If IEHP or the Delegate determines that the standing referral should be limited in terms of number of visits or timeframe, IEHP or the Delegate, in consultation with the PCP and specialist, must develop a treatment plan specifying the limits. The treatment plan must be approved by IEHP.

E. Standing referrals or extended access to specialty care approved without limitations do not require a treatment plan.

F. Potential conditions necessitating a standing referral and/or treatment plan include but are not limited to the following:

1. Significant cardiovascular disease;
2. Asthma requiring specialty management;
3. Diabetes requiring Endocrinologist management;
4. Chronic obstructive pulmonary disease;
5. Chronic wound care;
6. Rehab for major trauma;
7. Neurological conditions such as multiple sclerosis and uncontrollable seizures among others; and
8. Gastrointestinal (GI) conditions such as severe peptic ulcer and chronic pancreatitis among others.

G. Potential conditions necessitating extended access to a specialist or specialty care center and/or treatment plan include but are not limited to the following:

1. Hepatitis C;
2. Lupus;
3. HIV;
4. AIDS;
5. Cancer;
6. Potential transplant candidates;
14. UTILIZATION MANAGEMENT

B. Review Procedures
   2. Standing Referral/Extended Access to Specialty Care

    7. Severe and progressive neurological conditions;
    8. Renal failure; and
    9. Cystic fibrosis.

H. When authorizing a standing referral to a specialist for the purpose of the diagnosis or treatment of a condition requiring care by a physician with a specialized knowledge of HIV medicine the Member must be referred to an HIV/AIDS Specialist.

I. Any medical condition requiring frequent or repeat visits to a specialist should be considered by the PCP for submission of a standing referral or extended access to a specialty care referral.

   1. Upon Member request for a standing referral, the PCP shall make a determination within three (3) business days regarding submission of a standing referral to IEHP or the Delegate. This determination should be made after consulting with the Member’s specialist.

   2. Once a decision is made that a standing referral is needed, the PCP must submit a request for standing specialty referral to IEHP or Delegate within four (4) business days, using the designated form (See Attachment, “Standing Referral/Extended Access to Specialty Care” in Section 14). Appropriate medical records must be attached to the request. A determination will be rendered by IEHP or Delegate Medical Director (or designee) after referral and medical documentation is received.

J. All denials of standing specialty referral requests or extended access to specialty care must be forwarded to IEHP within three (3) business days of the denial. Delegates must also inform the PCP, specialist, and Member of the denial in writing according to prescribed formats for denials. Please refer to Policy 14A, “Utilization Management Delegation and Monitoring”.

K. Delegates can require specialists to provide to the PCP and the delegate written reports of care provided under a standing referral.

Out of Network

A. Members can be referred to out-of-network practitioners when appropriate specialty care is not available within the network.

B. All services for out-of-network providers must be coordinated adequately and timely.

C. IEHP and its Delegates must coordinate payment with out-of-network providers and ensure that cost to the Member is not greater than it would be if the services were furnished within the network.
14. UTILIZATION MANAGEMENT

B. Review Procedures
   2. Standing Referral/Extended Access to Specialty Care
14. UTILIZATION MANAGEMENT

C. Second Opinions

APPLIES TO:
A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:
A. Primary Care Physicians (PCPs), Specialists, and Members (if the Provider refuses) or their representative, have the right to request a second opinion from their delegated entity regarding proposed medical or surgical treatments from an appropriately qualified participating healthcare professional acting within their scope of practice who possesses a clinical background, including training and expertise, related to the particular illness, disease, condition, or conditions associated with the request for a second opinion.
B. Second opinions are authorized and arranged through the Member’s assigned Delegate.
C. The mandated timeframes for decisions of a request for a second opinion and subsequent notification to the Member and Practitioner are available in the Member’s Evidence of Coverage (EOC) and are available to the public, upon request.

DEFINITION:
A. Delegate – For the purpose of this policy, this is defined as a medical group, IPA, or any contracted organization delegated to provide Utilization Management (UM) services.

PROCEDURES:
A. The Member’s request for a second opinion is processed through IEHP or their assigned Delegate’s prior authorization system. Members should request a second opinion through their PCP or Specialist. If the PCP or Specialist refuses to submit a request for a second opinion, the Member can submit a grievance or a request for assistance through IEHP Member Services at (877) 273-4347. IEHP’s Member Services staff directs the Member to an IEHP Care Manager. The Care Manager assists the Member in contacting his/her IPA to request a second opinion.
B. The PCP or Specialist submits the request for a second opinion to the Member’s assigned Delegate including documentation regarding the Member’s condition and proposed treatment.
C. If the referral for a second opinion is approved, IEHP or the Delegate makes arrangements for the Member to see a physician in the appropriate specialty. Agreements with any network or out-of-network practitioner for second opinions must include the requirement that the consultation report for the second opinion be submitted within three (3) working days of the visit to the Practitioner.
D. If the referral is denied or modified, the Delegate provides written notification to the
C. Second Opinions

Member, including the rationale for the denial or modification, alternative care recommendations, and information on how to appeal this decision. Request may be denied if the Member insists on an out-of-network practitioner when there is an appropriately qualified Practitioner in-network.

E. If there isn’t a physician within the IEHP network that meets the qualifications for a second opinion, IEHP or its Delegate must authorize a second opinion by a qualified physician outside IEHP’s network and ensure that cost to the Member is not greater than it would be if the services were furnished within the network.

F. IEHP and its Delegates must provide and coordinate any out-of-network services adequately and timely.

G. Members disagreeing with their assigned Delegate’s denial of a second opinion may appeal through the IEHP Grievance process. Refer to Section 16, “Grievance and Appeal Resolution System” for more information.

H. In cases where the Member faces an imminent and serious threat to his or her health, including, but not limited to, the potential loss of life, limb or other major bodily function, or lack of timeliness that would be detrimental to the Member’s ability to regain maximum function, decisions and notification of decisions to Practitioners are completed in a timely fashion not to exceed seventy-two (72) hours after receipt of request, whenever possible.

I. In situations where the Member believes that the need for a second opinion is urgent, they can request facilitation by IEHP by contacting IEHP Member Services. IEHP reviews such requests, and if determined to be urgent, facilitates the process by working directly with the PCP and the Delegate. If the request is determined by IEHP to be not urgent, the Member is referred back to his/her PCP and assigned Delegate to continue the process.

J. The Delegate must utilize a Second Opinion Tracking Log (See Attachment, “Second Opinion Tracking Log” in Section 14) to track the status of second opinion requests and to ensure that the second opinion Provider submits the consultation report within three (3) working days of the visit. The Log must include all authorized, partially approved (modified), and denied second opinions and must be submitted on a monthly basis through IEHP’s Secure File Transfer Protocol (SFTP) server, by the 15th of the following month.

K. Reasons for providing or authorizing a second opinion include, but are not limited to, the following:

1. The Member questions the reasonableness or necessity of recommended surgical procedures;

2. The Member questions a diagnosis or plan of care for a condition that threatens loss of life, loss of limb, loss of bodily function, or substantial impairment including but not limited to a serious chronic condition;
14. UTILIZATION MANAGEMENT

C. Second Opinions

3. Clinical indications are not clear or are complex and confusing, a diagnosis is questionable due to conflicting test results, or the treating PCP/Specialist is unable to diagnose the condition and the Member requests an additional diagnostic opinion;

4. The treatment plan in progress is not improving the medical condition of the Member within an appropriate time period given the diagnosis and plan of care, and the Member requests a second opinion regarding the diagnosis or continuance of the treatment; and

5. The Member has attempted to follow the plan of care or consulted with the initial physician concerning serious concerns about the diagnosis or plan of care.

L. If the Member is requesting a second opinion about care from his or her PCP, the second opinion must be provided by an appropriately qualified physician of the Member’s choice within IEHP’s or the Delegate’s network.

M. If the Member is requesting a second opinion about care from a Specialist, the second opinion must be provided by any physician with the same or equivalent specialty of within the Member’s network. If not authorized, additional medical opinions obtained from a physician not within IEHP or the assigned Delegate’s network is the responsibility of the Member.

N. IEHP or the Delegate is responsible for submitting a copy of all authorizations, modifications, and denials of second opinions to the PCP.

O. The notification to the Practitioner that is performing the second opinion must include the timeframe for completion of the consultation and requirements for submission of the consultation report.

P. The second opinion Practitioner is responsible for submitting consultation reports to the Member, requesting Practitioner and PCP within three (3) working days of the visit. If the second opinion is deemed urgent, the submission of the consultation report must be within twenty-four (24) hours of the visit.

Q. Behavioral Health (BH) Providers who complete a second opinion evaluation or consultation must submit the “BH Initial Evaluation Coordination of Care Report” to the IEHP BH Department through the secure Provider portal within three (3) working days (See Attachment, “BH Initial Evaluation Coordination of Care Report” in Section 12). BH Providers can receive training on how to use the secure IEHP Provider portal or how to complete the Provider web forms by calling the IEHP Provider Relations Team at (909) 890-2054 or emailing providerservices@iehp.org.

R. The PCP is responsible for documenting second opinions and monitoring receipt of consultation reports on the PCP Referral Tracking Log (See Attachment, “Referral Tracking Log” in Section 14).

S. Mandated timeframes for decision including approval, denial or modification of a non-
urgent, urgent or concurrent request for a second opinion and subsequent notification to the Member and Practitioner must follow the timeframes outlined in Policy 14A, “Utilization Management Delegation and Monitoring”.

T. If the referral is denied or modified, the Delegate provides written notification to the Member including the rationale for the denial or modification, alternative care recommendations, and information on how to appeal this decision. The Member, Member’s Representative, or Practitioner appealing on behalf of the Member, disagreeing with a denial of a second opinion, may appeal through the IEHP Grievance process.

U. IEHP’s Medical Director or physician designee or the Delegate’s Medical Director or physician designee may request a second opinion at any time it is felt to be necessary to support a proposed method of treatment or to provide recommendations for an alternative method of treatment.

REFERENCE:

A. Coordinated Care Initiative (CCI) Three-Way Contract, Section 2.11.6, eff. January 1, 2018.
14. UTILIZATION MANAGEMENT

D. Emergency Services

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare –Medicaid Plan) Members.

POLICY:

A. Providers must render services to Members who present themselves to an Emergency Department (ED) for treatment of an emergent or urgent condition. Per federal law, at a minimum, services must include a Medical Screening Exam (MSE).

B. Delegates are responsible for payment of professional services rendered to Members at the ED per their contract with IEHP and this policy. Delegates with a full risk contract are responsible for the facility component. For all other Delegates, IEHP is responsible for the facility and technical services rendered to Members in the ED.

C. Per regulatory requirements, IEHP uses the following definitions of an emergency medical and psychiatric condition:

1. Emergency medical condition means a medical condition which is manifested by acute symptoms of sufficient severity (including severe pain) such that a prudent layperson who possesses an average knowledge of health and medicine could reasonably expect the absence of immediate medical attention to result in:
   a. Placing the health of the individual (or in the case of a pregnant woman, the health of the woman or her unborn child) in serious jeopardy;
   b. Serious impairment to bodily function; or
   c. Serious dysfunction of any bodily organ or part.

2. Emergency psychiatric condition means a behavioral health crisis which is manifested by acute psychiatric symptoms such that a prudent layperson who possesses an average knowledge of behavioral health could reasonably expect the absence of immediate intervention to result in:
   a. Placing an individual at risk for injuring themselves (Danger to Self);
   b. Placing an individual at risk for injuring others (Danger to Others); or
   c. Serious impairment in an individual’s ability to care for themselves or others (Gravely Disabled).

D. Medical and Behavioral Health Providers must have internal policies and procedures that delineate what steps are to be taken in the event a Member presents to their office with a medical or psychiatric emergency requiring immediate intervention. These steps should include when office staff or Practitioners should call 911. Providers need to ensure all office staff and Practitioners are trained on how to handle these types of emergencies.
14. UTILIZATION MANAGEMENT

D. Emergency Services

E. If it is determined that the Member’s condition was not emergent, IEHP or Delegate is responsible for the MSE, at a minimum based on individual contracts. The Member is not financially responsible and must not be billed for any difference between the amount billed by the Hospital and amount paid.

F. Emergency services can be subject to retrospective review. IEHP may retrospectively review claims and adjust payment if services provided were beyond the scope of the authorization and were not medically necessary. A retrospective billing adjustment of an Emergency Department visit does not require Member notification because the Member is not financially impacted by the decision and payment must be made for the MSE.

1. Hospitals can forward to the Delegate any facility costs associated with a visit to an ED that was authorized by a Delegate or Primary Care Physician (PCP) and judged non-emergent after medical review by a hospital staff physician.

2. If the Delegate’s medical review of the claim determines that the authorized visit was for a Member with a non-emergency medical condition, then the Delegate is financially responsible for the facility and technical components of the visit.

3. Where conflict regarding payment decisions cannot be resolved between the Hospital and Delegate, claims can be submitted to IEHP for final adjudication.

G. Delegates are encouraged to develop contractual arrangements with EDs and Physician Groups.

H. IEHP provides non-contracted facilities in the state of California with specific contact information needed to obtain timely authorization of post-stabilization care for Members.

I. Delegates shall make every effort to respond to requests for necessary post-stabilization medical care within thirty (30) minutes of receipt. In the event that the Delegate does not respond within this timeframe, the services are considered approved.

DEFINITION:

A. Delegate - For the purpose of this policy, this is defined as a medical group, IPA, or any contracted organization delegated to provide utilization management (UM) services.

PROCEDURES:

A. Prior authorization is not required for the MSE (or COBRA exam) performed at an ED, to the extent necessary to determine the presence or absence of an emergency medical condition, or for services necessary to treat and stabilize an emergency medical condition.

B. IEHP or Delegate’s payment for associated services must be based on the Member’s presentation and the complexity of the medical decision-making, as outlined in the American Medical Association (AMA) CPT Guide under ‘Emergency Department Services’.
14. UTILIZATION MANAGEMENT

D. Emergency Services

REFERENCE:

A. California Health & Safety Code §§ 1386(b)(17) and 1262.8(j).
14. UTILIZATION MANAGEMENT

E. Pre-Service Referral Authorization Process

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. Primary Care Physicians (PCPs) are responsible for providing general medical care for Members and requesting specialty care, diagnostic tests, and other medically necessary services either through the Delegate’s or IEHP’s referral authorization process.

B. The PCP must review any referral from an affiliated mid-level Practitioner, i.e. Nurse Practitioner (NP) or Physician Assistant (PA), prior to the submission of the referral. If there are questions about the need for treatment or referral, the PCP must see the Member.

C. IEHP and its Delegates must have a process in place to allow a Specialist to directly request authorization from IEHP or the Delegate for additional specialty consultation, diagnostic, or therapeutic services.

D. IEHP and its Delegates must have a process in place when decisions to deny or modify (authorize an amount, duration, or scope that is less than requested) are made by a qualified health care professional with appropriate clinical expertise in the condition and disease.

E. IEHP and its Delegates should evaluate PCP and Specialist referral patterns for over and underutilization.

DEFINITION:

A. Delegate – For the purpose of this policy, this is defined as a medical group, IPA, or any contracted organization delegated to provide utilization management (UM) services.

PROCEDURES:

A. The Nurse Practitioner or the Physician Assistant can sign and date the referral form, but must document on the form the name of the PCP or Specialist.

B. Referral forms from the PCP or Specialist must include the following information:

1. Designation of the referral request as either routine or expedited to define the priority of the response. Referrals that are not prioritized are handled as “routine.” Referrals that are designated as expedited must include the supporting documentation regarding the reason the standard timeframe for issuing a determination could seriously jeopardize the life or health of the Member or the Member’s ability to regain maximum function;
14. UTILIZATION MANAGEMENT

E. Pre-Service Referral Authorization Process

2. The diagnosis (ICD codes) and procedure (CPT) codes;
3. Pertinent clinical information supporting the request; and
4. Signature of referring physician and date. This may consist of handwritten signature, handwritten initials, unique electronic identifier, or electronic signatures that must be able to demonstrate appropriate controls to ensure that only the individual indicated may enter a signature.

C. Upon receipt of the referral, IEHP and its Delegates are responsible for verification of Member eligibility and plan benefits.

D. IEHP and its Delegates must have a process that facilitates the Member’s access to needed specialty care by prior authorizing at a minimum a consult and follow up visit (a total of two (2) visits) for medically necessary specialty care (See Attachment, “Specialty Office Service Auth Sets Grid” in Section 14).

E. Prior authorization for medically necessary procedures or other services that can be performed in the office, beyond the initial consultation and follow up visit, should be authorized as a set or unit. For example, when approving an ENT consultation for hearing loss, an audiogram should be approved (See Attachment, “Specialty Office Service Auth Sets Grid” in Section 14).

1. Exceptions - Prior Authorization is not required and Member may self-refer for the following services. All other services require prior authorization:
   a. Family Planning;
   b. Abortion Services;
   c. Sexually transmitted infection (STI) treatment;
   d. Sensitive and Confidential Services;
   e. HIV Testing and counseling at the Local Health Department;
   f. Immunizations at the Local Health Department;
   g. Routine OB/GYN Services, (including prenatal care by Family Care Practitioner (credentialed for obstetrics) within IEHP network;
   h. Out of area renal dialysis;
   i. Urgent Care;
   j. Preventative services;
   k. Urgent support for home and community service-based recipients; and
   l. Other services as specified by the Centers for Medicare and Medicaid Services (CMS).

F. Referrals to out-of-network practitioners require documentation of medical necessity,
14. UTILIZATION MANAGEMENT

E. Pre-Service Referral Authorization Process

rationale for the requested out-of-network referral, and prior authorization from the Delegate. Once the prior authorization has been obtained, the PCP’s office should assist the Member with making the appointment, continue to monitor the Member’s progress to ensure appropriate intervention, and assess the anticipated return of the Member into the network.

G. Decisions for referrals must be made in a timely fashion – not to exceed regulatory turnaround timeframes for determination and notification of Members and Practitioners (See Attachment, “UM Timeliness Standards – IEHP DualChoice” in Section 14). All timeframes must meet regulatory requirements as outlined in Title 42 of the Code of Federal Regulations Sections 438.210, 422.568, 422.570, and 422.572.

H. IEHP and its Delegates should monitor the PCP’s rates of referrals to Specialists to:
   1. Monitor for potential over or under utilization of Specialists; and
   2. Identify referral requests that are within the scope of practice of the PCP.

I. When IEHP or the Delegate identifies a potential problem with the PCP’s referrals to specialists, interventions need to be implemented that address the specific circumstances that were identified during the monitoring process. Interventions, such as written correspondence to the PCP that addresses the identified concern with supporting policy or contract attached, or the Medical Director contacting the PCP to discuss the concern, should be attempted to help educate the PCP.

J. There must be documented evidence of the corrective action taken by IEHP or the Delegate, including the PCP’s response to the intervention. The PCP’s referral pattern must be re-evaluated after a sufficient amount of time (at least sixty (60) days) has elapsed to monitor effectiveness.

K. Specialists are required to forward consultation notes to the PCP within two (2) weeks of the visit.

L. For IEHP DualChoice Members that have their Medi-Cal with IEHP, all request for services covered under the Medi-Cal benefit should be faxed to IEHP immediately upon receipt to (909) 890-5751.

M. In the event a Specialist or sole proprietor is terminated, IEHP or Delegate coordinates the redirection of assigned Members as needed.

REFERENCES:


B. Coordinated Care Initiative (CCI) Three-Way Contract, Section 2.11, eff January 1, 2018.
14. UTILIZATION MANAGEMENT

   E. Pre-Service Referral Authorization Process

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14. UTILIZATION MANAGEMENT

F. Wheelchair Purchase Referral Procedure

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. Delegates with a Global or Shared Risk are responsible for authorizing custom wheelchair purchases on their own behalf.

B. IEHP and its Delegates are responsible for authorizing non-custom wheelchair purchases and wheelchair rentals according to their individual contracts.

C. Medical necessity evaluations are required for custom wheelchair/power wheelchair purchase requests that are processed through IEHP or the Delegate. These evaluations must be performed by a physiatrist, orthopedist, neurologist or rheumatologist.

D. IEHP or Delegate should coordinate a seating evaluation, either facility-based or in-home, for Members who need custom wheelchairs, power wheelchairs, non-routine wheelchair therapeutic seat cushions, and/or wheelchair positioning systems.

E. IEHP or Delegate is responsible for repairs and maintenance of custom wheelchairs for qualified individuals as per Delegate’s contract.

DEFINITION:

A. Delegate – For the purpose of this policy, this is defined as a medical group, IPA or any contracted organization delegated to provide Utilization Management (UM) services.

PROCEDURES:

A. Prior to the submission of a request to IEHP for the purchase of a custom wheelchair/power wheelchair, the Member must have a thorough functional/safety evaluation performed by an independent third party such as a physiatrist, orthopedist, neurologist, or rheumatologist through the Delegate.

B. Custom wheelchair/power wheelchair purchase requests that meet Medicare criteria that are processed through a Delegate shall follow the Delegate's prior authorization procedures.

C. Custom wheelchair/power wheelchair requests that do not meet Medicare criteria are to be forwarded to IEHP via fax to 909-890-5751 as expeditiously as possible for IEHP to review and make a final determination.

1. IEHP will issue the denial letter if the request doesn’t meet Medicare or Medi-Cal criteria. If the request meets Medi-Cal criteria, IEHP will authorize the request under the Medi-Cal line of business.
F. Wheelchair Purchase Referral Procedure

D. IEHP or Delegate’s UM department will review the referral and the supporting documentation to make a determination within the timeframes outlined in the UM Timeliness Standards from the receipt of the referral from the Delegate (See Attachment, “UM Timeliness Standards – IEHP DualChoice” in Section 14).

E. IEHP will issue denial letters for services denied by IEHP, and the Delegate will issue denials for the services denied by them.

F. IEHP or Delegate’s UM Department will send notification to the requesting Provider, PCP, and seating clinic regarding the determination.

G. If approved, IEHP or Delegate will arrange for the Member to be assessed for a seating evaluation, either facility-based or in-home, to determine equipment needs.

H. Unless otherwise informed, the equipment will be delivered to the Member’s home.

I. The Seating Evaluator will contact the Member and schedule a post delivery assessment that will include the DME vendor, as needed.
14. UTILIZATION MANAGEMENT

G. Expedited Initial Organization Determinations

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. IEHP and its Delegates perform Expedited Initial Organization Determinations (EIOD) for service authorization requests where the Provider indicates or IEHP or the Delegate determines that following the standard timeframe for issuing a determination could seriously jeopardize the life or health of the Member or the Member’s ability to regain maximum function.

B. The Member, applicable representative, or treating Practitioner may submit an oral or written request for an EIOD if:

1. The Member or Practitioner believes that waiting for a decision under the standard timeframe could place the Member’s life, health, or ability to regain maximum function in serious jeopardy; and

2. The Member believes the Health Plan should furnish directly or arrange for services to be provided (when the Member has not already received the services outside of the Health Plan).

DEFINITION:

A. Delegate – For the purpose of this policy, this is defined as a medical group, IPA, or any contracted organization delegated to provide Utilization Management (UM) services.

PROCEDURES:

A. EIODs may not be requested for cases in which the only issue involves claims payment for services the Member has already received.

B. IEHP and its Delegate must render a decision as expeditiously as the Member’s health condition requires, but no later than seventy-two (72) hours after IEHP or the Delegate receives the request for an EIOD.

C. An EIOD is automatically provided when the request is made or supported by a Practitioner. The Practitioner must indicate, either orally, or in writing, that applying the standard timeframe for making a determination could seriously jeopardize the life or health of the Member or the Member’s ability to regain maximum function.

D. If clinical information is needed from a non-contracted practitioner, IEHP or the Delegate will request this information within twenty-four (24) hours of the initial request for an EIOD. Non-contracted practitioners must make reasonable and diligent efforts to
14. UTILIZATION MANAGEMENT

G. Expedited Initial Organization Determinations

expeditiously gather and forward all necessary information to assist in meeting the required time frame. Regardless of whether or not IEHP or the Delegate must request clinical information from non-contracted practitioners, IEHP and Delegates are still responsible for meeting the same timeframe and notification requirements for EIODs.

E. If it is determined that the Member’s condition does not warrant an expedited determination, the Member will be verbally notified within seventy-two (72) hours of receipt of the request (includes weekends and holidays) followed by written notification within three (3) calendar days of the verbal notification. The request will automatically be processed for a determination within the standard timeframe of fourteen (14) calendar days from the day the request was received for an EIOD. The Expedited Criteria Not Met notice must:

1. Explain that the request will be processed using the fourteen (14) calendar day timeframe for standard determinations;

2. Inform the Member of the right to file an expedited grievance if he or she disagrees with the decision to not expedite the determination, give instructions for filing an expedited grievance; give the expedited grievance process timeframe, and an explanation of the criteria for expedited reviews;

3. Inform the Member of the right to resubmit a request for an EIOD if the Member gets any Practitioner’s support indicating that applying the standard timeframe for making determinations could seriously jeopardize the life or health of the Member or the Member’s ability to regain maximum function. The request will be expedited automatically; and

4. Provide instructions about the expedited grievance process and its timeframes.

F. If the request is approved for an EIOD, the determination must be made in accordance with the following requirements:

1. Whether the decision is to approve, modify, or deny, the Member and Practitioner must be notified of the decision within seventy-two (72) hours of receipt of the request;

2. If the initial verbal notification to the Member of the expedited determination was successful, then written notification to the Member must occur within three (3) calendar days of the verbal notification. All attempts of verbal communication with Members must be documented with the time, date, and initials of IEHP or Delegate's staff making the call; and

3. If verbal notification is unsuccessful, written notification is given for a modification or denial determination, the Member and Practitioner must receive the notification within seventy-two (72) hours of receipt of the EIOD request.

G. Written communication regarding a modification or denial must be written in a manner that is understandable and sufficient in detail so that the Member and Practitioner can
14. UTILIZATION MANAGEMENT

G. Expedited Initial Organization Determinations

1. Understand the rationale for the decision. The Integrated Denial Notice (IDN), also known as Notice of Denial of Medical Coverage, letter must include:
   1. The specific reason for the denial that takes into account the Member’s presenting medical condition, disabilities, and special language requirements, if any;
   2. The determination is based upon Medicare Coverage Guidelines;
   3. Information regarding the Member’s right to a standard or expedited reconsideration and the right to appoint a representative to file an appeal on the Member’s behalf;
   4. A description of both the standard and expedited reconsideration processes that include conditions for obtaining an expedited reconsideration, and the other elements of the appeals process; and
   5. The Member’s right to submit additional evidence in writing or in person.

H. An extension of no more than fourteen (14) calendar days may be allowed to perform the review under the following circumstances:
   1. There is justification for additional information (e.g., allowing for additional diagnostic procedures or specialty consultations) and there is documentation on how this delay is in the interest of the Member.
   2. The Member or Practitioner requests an extension of time to provide IEHP with additional information.
   3. The practitioner requesting the EIOD is not contracted and the clinical information necessary to make the determination is not submitted within seventy-two (72) hours. An attempt to contact the non-contracted provider will be made within twenty-four (24) hours of receipt.

I. Extensions must not be used to pend organization determinations while waiting for medical records from contracted Providers.

J. The Member will be notified in writing of the reason for the delay, utilizing the Extension Needed for Additional Information – Expedited and Standard Initial Determination letter, and informed of the right to file an expedited grievance (oral or written) if he or she disagrees with the decision for an extension. The written notification for the extension will include the clinical information needed or the test or examination required.

K. Timeframe and notification requirements for all EIOD requests will be identified and reviewed on the Denial and Approval universe submitted by IPAs on a monthly basis (See Attachments, “IEHP Universe Standard Auth MSSAR Template” in Section 21).
14. UTILIZATION MANAGEMENT

G. Expedited Initial Organization Determinations

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14. UTILIZATION MANAGEMENT

H. Referral and Denial Audits

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. Per IEHP Policy 14A, “Utilization Management Delegation and Monitoring,” Utilization Management (UM) activities are delegated to contracted entities that meet IEHP UM standards.
B. IEHP performs a monthly retrospective audit of denied and partially approved (modified) referrals submitted monthly by the Delegate.
C. IEHP performs a monthly retrospective audit of approved referrals submitted monthly by the Delegate.
D. IEHP performs a Delegation Oversight Audit (DOA) of all Delegates to review the UM process for approving, denying or partially approving (modifying) referrals as outlined under Policy 14A, “Utilization Management Delegation and Monitoring”. Focused approved referral and denial audits are also performed when issues are identified.

DEFINITION:

A. Delegate - For the purpose of this policy, this is defined as a medical group, IPA, or any contracted organization delegated to provide utilization management (UM) services.

PROCEDURES:

Monthly Retrospective Denial Audit

A. IEHP performs a monthly retrospective audit of denied and modified referrals submitted monthly by the Delegate.
B. IEHP uses the IPA Denial Log Review Tool for the monthly retrospective denial audits to evaluate referral timeliness and document the examined referral results.
C. In order to pass the monthly audit, the Delegates must achieve a:
   1. Score of 90% or greater on:
      a. Overall Denial Review;
      b. Critical Element #1: Member Notification;
      c. Critical Element #2: Member Language;
      d. Critical Element #3: Appropriate use of Criteria; and
14. UTILIZATION MANAGEMENT

H. Referral and Denial Audits

e. Critical Element #4: Correct Template.

2. Score of 5% or lesser on:
   a. Denial Rate
      1) Appropriateness and Volume of Denials would be taken into consideration.

D. If the Delegate fails to achieve a Substantial Compliance score of 90% or greater for two (2) consecutive months on any of the above audit areas, a Corrective Action Plan (CAP) will be issued. At its discretion, IEHP may also enforce one (1) or more of the following:

   1. Concurrent denial review for a percentage of total denials may be initiated at which time the Delegate may receive a score of zero (0) for each month the concurrent review is conducted. IEHP will determine the percentage required for concurrent review;

   2. The Delegate may be frozen to new Member enrollment until the Delegate passes the monthly audit for two (2) consecutive months;

   3. A focused meeting with the Delegate’s Administration and IEHP’s Chief Network Officer, and/or Medical Director;

   4. Sanctions may be enforced as outlined in the Delegate’s contract with IEHP under Retrospective Denial Audits; and/or

   5. Other actions as recommended by the Delegation Oversight Committee.

E. Persistent non-compliance may result in the termination of the Delegate’s contract.

Monthly Retrospective Approval Audit

A. IEHP performs a monthly retrospective audit of ten (10) approved referral files randomly selected from the submitted monthly Organization Determinations, Appeals and Grievances (ODAG) universes in that month by the Delegate.

B. IEHP uses the IPA Approval Review Tool for the monthly retrospective approval audits to evaluate referral timeliness and document the examined referral results.

C. In order to pass the quarterly audit, the Delegates must achieve a:

   1. Score of 90% or greater on the Overall Approval File Review.

D. If the Delegate fails to achieve a Substantial Compliance score of 90% for two (2) consecutive months, a Corrective Action Plan (CAP) will be issued. At its discretion, IEHP may also enforce one or more of the following:

   1. Concurrent approval review for a percentage of total approvals may be initiated at which time the Delegate may receive a score of zero (0) for each month the
14. UTILIZATION MANAGEMENT

H. Referral and Denial Audits

concurrent review is conducted. IEHP will determine the percentage required for concurrent review;

2. The Delegate may be frozen to new Member enrollment until the Delegate passes the monthly audit for two (2) consecutive months;

3. A focused meeting with the Delegate’s Administration and IEHP’s Chief Network Officer, and/or Medical Director; and/or

4. Other action as recommended by the Delegation Oversight Committee.

E. Persistent non-compliance may result in the termination of the Delegate’s contract.

Delegation Oversight Audit (DOA)

A. IEHP performs an onsite Delegation Oversight Audit (DOA) of all delegated entities to review the UM process. Please refer to Delegation Oversight Audit Preparation Instructions (See Attachment, “Delegation Oversight Audit Preparation Instructions – IEHP DualChoice” in Section 13).

B. IEHP staff notifies the Delegate in writing two (2) weeks in advance of the scheduled annual audit. IEHP reserves the right to give as little as twenty-four (24) hours verbal notice for focused audit that occur between DOAs.

C. Audit staff from IEHP includes, at a minimum, the Delegation Oversight Nurse. In addition, the IEHP Medical Director, Director of Quality Management, Delegation Oversight Manager, Quality Management Manager or other IEHP staff may participate.

D. UM Process Review Components:

1. Approved Referral File Review
   a. Approved pre-certification score will be an aggregate of the monthly retrospective file review scores for the period of July 1st of the previous calendar year thru June 30th of the current year.

2. Denial File Review
   a. Denial File Review score will be an aggregate of the monthly retrospective denial audit scores for the period of July 1st of the previous calendar year through June 30th of the current year.

E. As part of the audit, IEHP requests details of the process used by the Delegate to follow-up and assure that Members receive approved services.

F. IEHP audit staff conducts a verbal exit conference with Delegate staff at the end of an audit.

G. Within thirty (30) days of the audit, a final score and cover letter are sent to the Delegate.
14. UTILIZATION MANAGEMENT

H. Referral and Denial Audits

H. Delegates pass the UM Referral and Denial audit sections of the DOA if the following scores are achieved:

1. 90% on the monthly aggregated Denial and Partially Approved (modifications) file review score for the period of July 1st of the previous calendar year through June 30th of the current year; and

2. 90% on the quarterly aggregated Approval file review score for the period of July 1st of the previous calendar year through June 30th of the current year.

I. Delegates that score below 90% on the approved referral and/or denial and partial approval (modification) sections above are required to submit a CAP addressing all deficiencies noted at the audit within a specified timeframe. Delegates who disagree with the audit results can appeal through the IEHP Provider appeals process by submitting an appeal in writing to the IEHP Chief Medical Officer within sixty (60) calendar days after the release of the final audit results.

J. Delegates that score 90% and above may be required to submit a CAP to address any deficiencies.

K. Audit results are included in the overall annual assessment of Delegates.

Focused Audits

A. Focused audits are conducted under the following circumstances:

1. Follow-up audit for deficiencies noted on the Delegation Oversight Audit (DOA).

2. Review of approvals and denials demonstrate that decisions being made are inconsistent, do not appear to be medically appropriate, or are not based on professionally recognized standards of care.

3. Any other circumstance that in the judgment of the IEHP Chief Medical Officer requires a focused audit.

B. At the time of the focused audit, Delegates are instructed to produce thirty (30) approved and thirty (30) denied- including partially approved (modified)- referrals along with their letter or other documentation that was provided to the Member. If a Delegate has fewer than thirty (30) approved referrals and fewer than thirty (30) denied referrals- including partially approved (modified) referrals- all of those referrals must be produced.

C. IEHP selects twenty (20) of the thirty (30) approved referrals and twenty (20) of the thirty (30) denied including partially approved (modified) referrals for review. If fewer than twenty (20) referrals are available, all referrals are reviewed.

D. If, during the focused audit, any of the selected referrals are deemed invalid by the reviewer (e.g., missing information or type of referral), the Delegate must substitute an alternate referral acceptable to IEHP.
14. UTILIZATION MANAGEMENT

H. Referral and Denial Audits

E. IEHP uses the UM Approval Audit Tool for Focused Approved Referral Audits and the UM Denial Audit Tool for Focused Denied Referral Audits to document the examined referral results and evaluate referral timeliness.

F. If the Delegate fails to achieve a Substantial Compliance score of 90% for two (2) consecutive months of a Focused Audit, a CAP will be issued. At its discretion, IEHP may also enforce one (1) or more of the following:

1. Concurrent approval and denial review for a percentage of total approvals and denials may be initiated at which time the Delegate will receive a score of zero (0) for each month the concurrent review is conducted. IEHP will determine the percentage required for concurrent review;

2. The Delegate may be frozen to new Member enrollment until the Delegate passes the monthly Focused audit for two (2) consecutive months;

3. A focused meeting with the Delegate’s Administration and IEHP’s Chief Network Officer, and/or Medical Director; and/or

4. Sanctions may be enforced as outlined in the Delegate’s contract with IEHP under Retrospective Approval and Denial Audits.

G. Persistent non-compliance may result in the termination of the Delegate’s contract.

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14. UTILIZATION MANAGEMENT

I. Utilization Management Reporting Requirements

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. All Delegates must report Utilization Management (UM) information to IEHP as described below on a monthly, semi-annual and annual basis.

B. Delegate reports must be received by IEHP electronically using a Secure File Transfer Protocol (SFTP) server.

C. Reports are due on or before the due dates regardless if the due date is a weekend or a holiday.

DEFINITION:

A. Delegate – For the purpose of this policy, this is defined as a medical group, IPA, or any contracted organization delegated to provide utilization management (UM) services.

PROCEDURES:

A. Monthly Reporting Requirements:

1. Reporting requirements include a monthly and quarterly assessment of utilization data and denial activity. Monthly reports are due to IEHP by the 15th of the month following the month in which services were rendered approved or denied and include the following:

   a. Monthly Approval File Review – No later than the 15th day of the month following the reporting month, IEHP Delegation Oversight will request and review ten (10) Approval Files with the supporting documentation including Approval Letters used to make the decisions from the Organization Determinations Appeals and Grievance (ODAG) Approvals Universe Pre-Service for CMC. Delegate must submit all required documentation related to the file selections by the 15th day of the following month.

   b. Monthly Denials and Partial Approvals (Modifications) – Must be submitted in excel file format via the ODAG – Denial Universe – Payment and Pre-Services Template and include all referral and clinical information, and copies of all denial letters.

   c. EIOD Log – Data elements from this log will now be reported on the ODAG Universe Pre-Service report, no requirement for a separate report.
I. Utilization Management Reporting Requirements

d. **Second Opinion Tracking Log** – Include all authorizations, partial approvals (modifications), and denial information for second opinion requests. The Log must include the reason the second opinion was requested (See Attachment, “Second Opinion Tracking Log” in Section 14).

e. **Skilled Nursing Facility (SNF) Admissions** – All Delegates must notify IEHP of all SNF admissions from the previous month by the 15th of the current month and/or as soon as it is determined the Member will transition to custodial care.

1) **Long Term Care (LTC) Data Sheet** – Delegates must include all data listed on the “LTC Data Sheet” (See Attachment, “Long Term Care (LTC) Data Sheet” in Section 14). Submit LTC Data Sheet along with factsheet electronically using a IEHP SFTP server.

B. Semi-Annual Reporting Requirements:

1. UM Semi-Annual Reports must be submitted to IEHP by February 15th and August 15th. The reports should include, at a minimum, UM goals and activities, trending of utilization activities for under and over utilization, Member and Practitioner satisfaction activities, interrater reliability activities, and a narrative of barriers and improvement activities. The Semi-Annual report due in February must also include the:

   a. **UM Program Annual Evaluation/ICE Report** that is the IPAs evaluation of the overall effectiveness of the UM Program, including whether or not goals were met, data, performance rates, barrier analysis, and improvement activities; and

   b. **UM Workplan Update** Submit an update of the Annual Workplan which includes planned activities for the year, timelines, responsible person(s) and committee(s). The Work Plan should include measurable goals, planned audits, follow-up activities and interventions related to identified problem areas.

C. Annual Reporting Requirements: The following reports must be submitted annually to IEHP by the last day of February of each calendar year:

1. **UM Program Description:** Reassessment of the UM Program Description must be completed annually by the UM Committee and/or Quality Management (QM) Committee and reported to IEHP including the following:

   a. Any changes made to the UM Program Description during the past year or intended changes identified during the annual evaluation; and

   b. UM Program Description Signature Page.

2. **UM Work Plan/Initial ICE Report:** Submit an outline of planned activities for the coming year, including timelines, responsible person(s) and committee(s). The
14. UTILIZATION MANAGEMENT

I. Utilization Management Reporting Requirements

   Work Plan should include measurable goals, planned audits, follow-up activities and interventions related to identified problem areas.

D. All reports identified on the Medicare Provider Reporting Requirements Schedule must be submitted to IEHP within the timeframes specified via IEHP’s SFTP server.

E. Persistent failure to submit required reports may result in action that includes, but is not limited to, request for Corrective Action Plan (CAP), and may lead to freezing of new Member enrollment, termination or non-renewal of the IEHP Agreement.

F. Any discrepancies in reported information are addressed with the IPA in accordance with monitoring activities outlined in Policy 14A, “Utilization Management Delegation and Monitoring”.

INLAND EMPIRE HEALTH PLAN

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<thead>
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<th>Original Effective Date:</th>
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14. UTILIZATION MANAGEMENT

J. Long Term Care (LTC) – Custodial Level

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. Long Term Care (LTC) facilities include skilled nursing, adult sub-acute, pediatric sub-acute, and other intermediate care units.

B. Members can be admitted to LTC facilities from acute inpatient settings, transition from skilled level, or as direct admits from the community.

C. IEHP or IPA is financially responsible for one hundred (100) skilled nursing days per benefit period for IEHP DualChoice Members. Please see Policy 14K, “Long Term Care (LTC) - Skilled Level” for more information.

D. IPAs are responsible for notifying IEHP of Members who require admission to LTC/custodial facilities as direct admits from the community and if the admission to LTC facility is after an acute hospital admission.

E. Delegates are responsible for coordinating with IEHP the provision of all necessary care coordination for Members in LTC facilities.

F. IEHP and IPAs are responsible for notifying Members and LTC/custodial facilities that IEHP DualChoice LTC benefits expire after one hundred (100) days of inpatient skilled nursing care per benefit period. Please see Policy 14K, “Long Term Care (LTC) - Skilled Level” for more information.

PURPOSE:

A. To promote the appropriate placement of Members into long term care when services cannot be provided in environments of lower levels of care or as an appropriate plan of transition from the hospital.

B. To ensure all nursing facilities and sub-acute facilities comply with all regulatory guidelines, including care coordination which will be facilitated by IEHP.

PROCEDURES:

A. IEHP will become financially responsible for facility fees once it has been determined that the Member requires a custodial level of care or when the allotted one hundred (100) skilled days have been exhausted. The IPA remains responsible for professional fees for the month of initial enrollment into the plan/IPA and admission to custodial care and month following.

B. Please refer to the Medi-Cal Provider Manual for information on custodial care under
14. UTILIZATION MANAGEMENT

J. Long Term Care (LTC) – Custodial Level

Medi-Cal.
14. UTILIZATION MANAGEMENT

K. Long Term Care - Skilled Level

APPLIES TO:

A. This policy applies for all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. This policy applies to IEHP and IPAs delegated to perform Utilization Management (UM) activities, except as otherwise noted.

B. IEHP is responsible for performing all aspects of non-delegated UM and Care Management (CM) related to Long Term Care (LTC) skilled level placement. IEHP will follow active Members while in the LTC facility.

C. IEHP DualChoice Members do not need a three (3) day acute hospital stay prior to admission to an LTC.

PURPOSE:

A. To promote the appropriate placement of Members into long term care when daily skilled nursing or rehabilitation services cannot be provided in environments of lower levels of care, or as an appropriate plan for discharge from the hospital.

B. To ensure all nursing facilities and subacute facilities comply with all regulatory guidelines, including care coordination which will be facilitated by IEHP.

PROCEDURES:

A. Appropriate LTC skilled level placement involves the following factors:

1. The Member requires skilled nursing services or skilled rehabilitation services on a daily basis.

2. Only contracted LTCs are utilized unless none are available, then a letter of agreement (LOA) is requested.

3. The Member’s eligibility and schedule of benefits are verified prior to authorizing appropriate services. Within the first five (5) days of each month, eligibility is re-evaluated for Members remaining in long term care from the prior month.

B. Primary Care Physicians (PCPs) must evaluate a Member’s need for LTC skilled level placement. A referral request must be submitted with sufficient medical information from the Member’s PCP for review and recommendation when transitioning from community or usual setting.

1. For non-delegated UM performed by IEHP, if the Member is in an acute facility, physician orders with treatment modalities may be documented in the medical record or appropriate forms and discussed with UM/CM staff in lieu of a referral being
C. IPAs are required to have a similar process for review and authorization of requests for LTC placement from home.

D. Prior to issuing verbal authorization for an admission, all the clinical reviews, the discharge date, and discharge needs must be received from the facility with the exception of when a tracking number may be necessary prior to the admission/transfer for services such as long term acute care (LTAC), or long term care.

E. Authorization details will be available for the facility to view on IEHP’s secure Provider portal once facility face sheet, admission orders, MC171 form, and if indicated, inter-facility transfer form have been received by IEHP.

F. Concurrent review is performed weekly, unless directed otherwise by the Long Term Care Review Nurse, until discharge. Concurrent review may be performed either through on-site chart review or telephonically.

G. Reviews should include physician communication and ongoing communication with other healthcare professionals involved in the Member’s care as necessary. Authorization decisions must be made within twenty-four (24) hours of receipt of request.

H. Adequate information must be available to determine the appropriate level of care including:

1. The Member’s level of function and independence prior to admission and currently;
2. Caregiver/family support;
3. Skilled care is required to achieve the Member’s optimal health status;
4. Around-the-clock care or observation is medically necessary;
5. The realistic potential and timeline for the Member to regain some functional independence;
6. Information obtained from Physical Therapy, Occupational Therapy, and Speech Therapy Departments, as necessary;
7. Expected outcome of the Member’s health status with skilled level placement is obtained through weekly reviews from the facility, unless directed otherwise by IEHP or IPA’s Case Management, for clinical updates, status of goals, and discharge planning (See Attachments, “Long Term Care (LTC) Initial Review Form” and “Long Term Care (LTC) Follow-up Review Form” in Section 14); and
8. Evaluation of alternative care to determine if the Member would be sufficient to achieve treatment goals, including:
   a. Home health care;
   b. Long term care (based upon the Member’s benefit; see Policy 14J, “Long
14. UTILIZATION MANAGEMENT

K. Long Term Care - Skilled Level

Term Care [LTC] – Custodial Level” in Section 14 for more information);
c. Intermediate care (based upon the Member’s benefit);
d. Adult day care (based upon the Member’s benefit; see Policy 12I, “Community Based Adult Services (CBAS)” – formerly known as Adult Day Health Care (ADHC)) or child day care;
e. Family education and training; and
f. Community networks and resources.

I. Appropriately licensed staff must assist in the evaluation and placement of Members into LTC facilities including involvement in the development, management, and monitoring of Member treatment plans.

J. The treatment plan is implemented, evaluated, and revised by the team of Providers and staff including, but not limited to, UM and/or CM staff, physicians, long term care Providers and staff, and IEHP or the IPA, as appropriate. The Member and family also are involved in the treatment plan implementation process to the extent necessary.

K. The UM/CM staff, together with the interdisciplinary team of Providers and staff, guide the Member toward meeting the treatment plan goals that include transfer to a lower level of care when it is medically appropriate.

L. UM/CM staff assists in the discharge planning process and the transfer and follow-up of the Member to the next level of care.

M. Transfer to a board and care or home environment is initiated when it is determined that the Member is at a “custodial” level of care and can be safely managed at a lower level of care (based upon the Member’s benefit).

N. Authorization will be given for bed hold with a physician’s order only.
   1. The bed hold will be authorized for up to seven (7) days.
   2. A separate authorization will be issued for a seven (7) day bed hold.
   3. If the Member does not return to the LTC facility who requested the hold in seven (7) days, the bed hold will expire.
   4. The LTC facility must accept the Member back, if requested, in order to receive payment for the bed hold.

O. Financial responsibility for IEHP DualChoice Members continues for up to one hundred (100) days per benefit period. IEHP or IPA will ensure that the Member is admitted to a contracted facility, as applicable. IEHP or IPA is responsible for notifying the IEHP DualChoice Member, assigned PCP, and LTC facility that the benefits expire after one hundred (100) days of inpatient care per benefit period, and again prior to the Member exceeding the one hundred (100) days benefit limit.

P. The Medical Director or physician designee reviews all medical necessity denials. All
14. UTILIZATION MANAGEMENT

K. Long Term Care - Skilled Level

denial decisions are made in writing to the PCP, attending physician, facility, and Member. The initial notification is made to the Provider within twenty-four (24) hours via phone or fax.

Q. Practitioners and Members are given a written or electronic notification of the decision of non-coverage of further LTC skilled no later than two (2) calendar days prior to proposed termination of services.

1. The Notice of Medicare Non-Coverage (NOMNC) letter may be delivered earlier if the date that coverage will end is known.

2. If the expected length of stay or service is two (2) days or less, the NOMNC letter must be given on admission.

3. The NOMNC should not be used when it is determined that the Member’s services should end based on the exhaustion of benefits (such as the one hundred (100) day long term care limit per benefit period). If the Provider is unable to personally deliver the NOMNC to a person legally acting on behalf of a Member, then the Provider should telephone the representative to advise him or her of the following:
   a. The proposed termination of services; and
   b. The Member’s appeal rights must be explained and the name and telephone number of the Quality Improvement Organization (QIO) should be provided.
   c. The date of the conversation with the Member’s representative is the date of the receipt of the notice. Confirm the telephone contact by written notice mailed on that same date.
   d. When direct phone contact cannot be made, the notice is sent to the Member’s representative by certified mail, return receipt requested. The date that someone at the representative’s address signs (or refuses to sign) the receipt is the date of receipt for the NOMNC letter.
   e. The Delegate must issue the Detailed Explanation of Non-Coverage (DENC) to QIO no later than the date specified and the facility must issue a copy to the Member.

R. On the 15th of each month, IPAs must notify IEHP of Members who are receiving skilled care as of the previous month or are estimated to require long term care greater than the one hundred (100) day LTC skilled limit per benefit period by faxing the Long Term Care (LTC) Data Sheet along with the face sheet to (909) 912-1044 (See Attachment, “Long Term Care [LTC] Data Sheet” in Section 14). Please see Policy 14I, “Utilization Management Reporting Requirements” for more information.
14. UTILIZATION MANAGEMENT

K. Long Term Care - Skilled Level
14. UTILIZATION MANAGEMENT

L. Hospice Services

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. If a Member elects to receive the Medicare hospice benefit, the Enrollee may remain in IEHP DualChoice but will obtain the hospice service through their Medicare Fee-For-Service benefit.

B. IEHP DualChoice and Providers of hospice services would be required to coordinate these services with the rest of the Member’s care.

PROCEDURE:

A. Requests for initial hospice evaluation by a Medicare certified hospice Provider require prior authorization. Please refer to Policy 14E, “Pre-Service Referral Authorization Process” for more information.

REFERENCE:

14. UTILIZATION MANAGEMENT

M. Acute Admission and Concurrent Review

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:

A. Delegated entities are responsible to perform inpatient Utilization Management (UM) activities as outlined in their contract.

B. Prior to any termination or non-coverage of services, the Provider of the service must provide valid delivery of the written notification to the Member and/or the Member’s representative of the decision to terminate services.

C. Valid delivery means that the Member and/or Member’s representative must be able to understand the purpose and contents of the notice in order to sign for receipt of it.

D. If the Member is not able to comprehend the contents of the notice, the notice must be delivered to and signed by an authorized representative for the Member.

E. If the Member refuses to sign the notice, the notice is still valid as long as the Provider documents that the notice was given, but the Member refused to sign.

PURPOSE:

A. To ensure the appropriateness of inpatient admission, level of care, and length of stay (LOS) based upon medical necessity.

DEFINITION:

A. Delegate – For the purpose of this policy, this is defined as a medical group, IPA, or any contracted organization delegated to provide utilization management (UM) services.

PROCEDURES:

A. IEHP or Delegate is notified of all admissions by the hospital (Case Management or Admitting Department) including those planned and unplanned transitions. Admission review is performed within one (1) business day of knowledge of admission.

1. IEHP or Delegate’s Inpatient UM department maintains a daily census in their medical management system to identify Members that have transitioned from one setting to another setting.

B. No authorization number for an admission will be issued until all the clinical reviews, the discharge date, and discharge needs have been received from the facility. A tracking number may be necessary prior to the admission/transfer for services such as to long term
14. UTILIZATION MANAGEMENT

M. Acute Admission and Concurrent Review

acute care (LTAC), skilled nursing facility (SNF), or acute rehabilitation.

C. Concurrent review is performed until discharge. Concurrent review can be performed either on-site by chart review or telephonically; the frequency of which will be determined by IEHP or Delegate’s UM nurse for acute stays. Please refer to Policies 14J, “Long Term Care (LTC) – Custodial Level” and 14K, “Long Term Care (LTC) – Skilled Level” for review schedules specific to these levels of care.

D. Reviews should include physician communication and ongoing communication with other healthcare professionals involved in the Member’s care, as necessary. Authorization decisions must be made within twenty-four (24) business hours of receipt of request.

E. Approved guidelines and criteria are utilized for justifying medically necessary services at the appropriate level of care (e.g. acute, sub-acute, skilled nursing, and home/community) and length of stay must be applied and documented in a consistent manner. The application of criteria takes into consideration individual factors such as age, co-morbidities, complications, progress of treatment, psychosocial situation, and home environment. Additionally, application of criteria takes into consideration whether services are available within the service area, benefit coverage, and other factors that may impact the ability to implement an individual Member’s care plan.

F. Member eligibility and benefits are verified to ensure appropriate authorization and management of services.

G. Chronic, complex, high risk, high cost, re-admissions or catastrophic cases are referred for potential care management, transition of care (TOC) and/or disease management interventions. Cases are reviewed by the Medical Director or designee who may refer to the UM Subcommittee as deemed necessary.

H. (For non-global risk Delegates only) Delegates who have accountability for Inpatient Utilization Management must notify IEHP of Members with inpatient stay on day twenty (20) and weekly using the Acute Inpatient Data Sheet along with the face sheet. Information should be faxed to (909) 477-8553 (See Attachment, “Acute Inpatient Data Sheet” in Section 14). Subsequent reviews must be sent to IEHP weekly until the Member is discharged.

I. Board certified physicians from appropriate specialty areas assist with determinations of medical appropriateness, as needed.

J. Either UM or Care Management (CM) staff, as appropriate, is assigned to perform hospital concurrent review and must document findings in the medical management system.

K. Facilities, including acute, rehabilitation, long term acute care and psychiatric, must notify Members who are inpatient about their hospital discharge appeal rights. Facilities must issue the Important Message from Medicare (IM) within two (2) calendar days of admission, must obtain the signature of the beneficiary or his or her representative and
14. UTILIZATION MANAGEMENT

M. Acute Admission and Concurrent Review

provide a copy at that time to the Member/Member’s representative.

1. A follow up copy must be delivered no more than two (2) calendar days before
the planned date of discharge.

2. When discharge cannot be predicted in advance, the follow up copy may be
delivered as late as the day of discharge giving the beneficiary at least four (4)
hours to consider their right to request a Quality Improvement Organization
(QIO) review.

3. If delivery of the original IM is within two (2) calendar days of the date of
discharge, no follow up notice is required.

4. The Detailed Notice of Discharge must be completed with all necessary
information and delivered to the Member by the facility.

L. Attending physician – The physician responsible for the Member’s care while
hospitalized must perform the following functions:

1. Assess the Member’s medical status upon admission, determine level of care and
estimated length of stay, and document this information in the medical record;

2. Verify that appropriate medical criteria was utilized for inpatient admission;

3. Communicate the medical assessment to UM/CM staff either verbally or in
writing; and

4. Continue to document medical necessity in the medical record for the duration of
the Member’s hospital stay.

M. IEHP and Delegate’s UM/CM Staff are responsible for identifying and referring any
potential quality of care issue occurring in an inpatient or outpatient setting to IEHP’s
Quality Management (QM) Department. Indicators used for identification of potential
quality of care issues include the following:

1. Unexpected death (maternal/perioperative/neonatal);

2. Unplanned return to the operating room;

3. Anesthesia event (neurological impairment);

4. Extended length of stay due to iatrogenic complications;

5. Retained foreign object;

6. Decubitus development;

7. Nosocomial infection;

8. Readmissions within thirty (30) days of discharge (same diagnosis);

9. Serious Reportable Adverse Events (SRAEs), such as surgery on wrong patient,
surgery on wrong body part, etc.; and
14. UTILIZATION MANAGEMENT

M. Acute Admission and Concurrent Review

10. Provider Preventable Conditions (PPC) and/or Health Care-Acquired Conditions (HCAC).

N. Focused reviews are conducted for known problem diagnoses, procedures, or Practitioners requiring guidance in managing the utilization of services.

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INLAND EMPIRE HEALTH PLAN

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<td>Revision Date:</td>
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# 14. UTILIZATION MANAGEMENT

## Attachments

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<td>Approved Referral Audit Tool</td>
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<td>Health Plan Referral Form for Out-of-Network and Special Services</td>
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<td>IPA Denial Log Review Tool – IEHP DualChoice</td>
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Attachment 14 – Acute Inpatient Data Sheet

Acute Inpatient Data Sheet
(20 Day Stays and Greater)

IPA Name  
Submitted By  
Date Submitted  
Submitted By  
Contact Number  

Please fax reviews on day 20 and weekly thereafter to (909) 477-8553.

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<tr>
<th>Member Name</th>
<th>Member ID</th>
<th>Age / Gender</th>
<th>Facility Name</th>
<th>Admission / Enrollment Date</th>
<th>Attending Physician</th>
<th>Clinical Summary (e.g. Presenting DX, Co-morbid/complications resulting in extended stay)</th>
<th>Discharge Plan</th>
<th>If out-of-area/network, explain? *See Legend</th>
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*Legend:
CC = Care Coordination
COC = Continuity of Care
HLOC = Higher Level of Care
ED = Emergency Department Admit
NBAN = No Bed Available in Network
Instructions: IEHP randomly selects # Approvals from delegates monthly universe submission. Each file will be reviewed using the elements below and noted as follows: "1" yes the information is present, "0" the information is not present, and a grayed out cell if the information is not applicable. Each file has a maximum score of 8.

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<td>c Auto Authorization</td>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA, 14A.15</td>
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<td>f Decision Date</td>
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<td>g Written Physician Notification Date</td>
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This form is for services requiring health plan review

### 1. Referrals

<table>
<thead>
<tr>
<th>Date:</th>
<th>____________________________</th>
<th>(To be completed by IEHP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>❑ URGENT/EXPEDITED - Decision w/in 72 hours</td>
<td>Auth/Tracking Number: ____________________________</td>
<td></td>
</tr>
<tr>
<td>❑ ROUTINE</td>
<td>Auth/Expiration Date: ____________________________</td>
<td></td>
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<tr>
<td>❑ PATIENT REQUESTED</td>
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<tr>
<td>❑ RETRO</td>
<td>CPO Services</td>
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<tr>
<td>❑ CBAS</td>
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</tbody>
</table>

### 2. General Information

<table>
<thead>
<tr>
<th>Member Name (please print)</th>
<th>DOB</th>
<th>ID #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plan (select one)</td>
<td>Medi-Cal</td>
<td>Healthy Families</td>
</tr>
<tr>
<td>Address</td>
<td>City</td>
<td>Zip</td>
</tr>
<tr>
<td>Diagnosis (Required)</td>
<td>ICD-10 Code (REQUIRED)</td>
<td></td>
</tr>
</tbody>
</table>

Clinical justification for referral and description of procedure requested if any (required) (attach clinical information). When requesting services out-of-network, please provide documentation of failed attempts at in-network providers/facilities.

<table>
<thead>
<tr>
<th>Referred to (must refer to a specialist within network)</th>
<th>Specialty</th>
<th>NPI#:</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>City:</td>
<td>Zip</td>
<td>Fax</td>
</tr>
<tr>
<td>Referring Provider (please print)</td>
<td>Phone</td>
<td>Fax</td>
<td></td>
</tr>
<tr>
<td>Address</td>
<td>City:</td>
<td>Zip</td>
<td></td>
</tr>
<tr>
<td>Referring Provider Signature (REQUIRED)</td>
<td>NPI#:</td>
<td>Date</td>
<td></td>
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</tbody>
</table>

### 3. Service Requested

<table>
<thead>
<tr>
<th>Service Requested (check one)</th>
<th>Consult</th>
<th>Follow-up</th>
<th>DME</th>
<th>Home Health</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service Location/Facility:</td>
<td>Office</td>
<td>Outpatient</td>
<td>Inpatient</td>
<td></td>
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</tr>
<tr>
<td>Procedure Requested (Submit supportive documentation with the claim to justify the Evaluation and Management (E &amp; M) code if this service will occur the same day as the procedure.)</td>
<td>CPT Code (REQUIRED)</td>
<td></td>
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<tr>
<td>Facility Address</td>
<td>Phone</td>
<td>Fax</td>
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</tbody>
</table>

### 4. Completed by IEHP

<table>
<thead>
<tr>
<th>Date Additional Information Required:</th>
<th>Date Additional Information Received:</th>
<th>❑ Approved</th>
<th>❑ Modified</th>
<th>❑ Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assigned IPA:</td>
<td></td>
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</tbody>
</table>

Medical Reviewer Comments

Medical Reviewer Signature (Circle Title: MD, DO, RN, LVN, Coordinator) | Date | Criteria utilized in making this decision is available upon request by calling IEHP (866) 725-4347. 

UPON ACCEPTANCE OF REFERRAL AND TREATMENT OF THE MEMBER, THE PHYSICIAN/PROVIDER AGREES TO ACCEPT IEHP CONTRACTED RATES. This referral/authorization verifies medical necessity only. Payments for services are dependent upon the Member’s eligibility at the time services are rendered.

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### IPA Denial Log Review Tool

**Medicare**

#### Data Dictionary

<table>
<thead>
<tr>
<th>Policy and/or Regulation</th>
<th>Data Dictionary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provided from the Delegate file submission</td>
<td>a Denial Tracking Number: The number located on the referral form for tracking purposes.</td>
</tr>
<tr>
<td>CMS UM Timeliness, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.8 - 10</td>
<td>b File Type Requested: Pre-Service Routine, Pre-Service Expedited, Post Service Retrospective Review.</td>
</tr>
<tr>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.15</td>
<td>c Referral Request Date: Data the referral was sent to Delegate for review.</td>
</tr>
<tr>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.15</td>
<td>d Referral Received Date: Data the referral was received by the Delegate for a decision.</td>
</tr>
<tr>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.15</td>
<td>e Decision Date: Date the Delegate decision was made by the Delegate to Approve, Modify or Deny the case.</td>
</tr>
<tr>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.15</td>
<td>f Written Physician Notification Date: Date of the physician written notification.</td>
</tr>
<tr>
<td>CMS UM Timeliness, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.12</td>
<td>g Physician Availability to Discuss: Physician will be available to discuss determinations based on medical appropriateness.</td>
</tr>
<tr>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.10</td>
<td>h Decision Timeliness: Delegates decision to approve, modify, deny a referral request in a timely manner according to regulations.</td>
</tr>
<tr>
<td>CMS UM Timeliness, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.10</td>
<td>i Member Notification: Standard: Evidence the Member was contacted regarding their denial by day 12 of request (must be within the 14 calendar day timeframe). Expedited: Evidence the Member was contacted regarding their denial within 72 hours, if Member was contacted by phone, an additional 3 days may be added to the timeframe from the date of the call.</td>
</tr>
<tr>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.8 - 10</td>
<td>k Clinical Information: Clinical information supporting the request.</td>
</tr>
<tr>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.8 - 10</td>
<td>l Alternative Direction: The Member is given alternative direction for follow-up care.</td>
</tr>
<tr>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.8 - 10</td>
<td>m Written Notification: Written Notification to the physician of the requested referral decision by the Delegate.</td>
</tr>
<tr>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.11</td>
<td>n Member Language: The denial letter Reminder is clear &amp; concise.</td>
</tr>
</tbody>
</table>

#### Rich Text

Instructions: IEHP randomly selects 30 denials from delegates monthly universe submission. Each file will be reviewed using the elements below and noted as follows: "1" yes the information is present, "0" the information is not present, and a grayed out cell if the information is not applicable. Each file has a maximum score of 12.

### IPA Denial Log Review Tool

<table>
<thead>
<tr>
<th>(a) Denial Tracking Number</th>
<th>(b) File Type Requested</th>
<th>(c) Referral Request Date</th>
<th>(d) Referral Received Date</th>
<th>(e) Decision Date</th>
<th>(f) Written Physician Notification Date</th>
<th>(g) Physician Availability to Discuss</th>
<th>(h) Decision Timeliness</th>
<th>(i) Member Notification</th>
<th>(j) Physician Reviewed</th>
<th>(k) Clinical Information</th>
<th>(l) Alternative Direction</th>
<th>(m) Written Notification</th>
<th>(n) Member Language</th>
<th>Comments</th>
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#### Total Score

<table>
<thead>
<tr>
<th>(o) Points Possible</th>
<th>(p) Points Received</th>
<th>(q) Individual Score</th>
<th>(r) Total Score</th>
</tr>
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<tbody>
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</table>

#### Comments

- **Selected Individual Scores:**
  - 0
  - 12
  - 0
  - 0%
  - 0%
  - 0%
  - 0%
  - 0%
  - 0
  - 12
  - 0
  - 0
  - 0

- **Total Score:**
  - 0 12 0% X X X X

#### Reference

CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.11
CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.8 - 10
CMS UM Timeliness, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.11
CMS UM Timeliness, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.8 - 10
CMS UM Timeliness, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.9 - 11
CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.12
CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.15
CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.8 - 10
CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_14A.15
<table>
<thead>
<tr>
<th>Practitioner Language</th>
<th>The denial letter reason is clear &amp; concise.</th>
<th>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_16A.12</th>
</tr>
</thead>
<tbody>
<tr>
<td>Correct Template</td>
<td>Use of IEHP issued CMS Template</td>
<td>CMS, IEHP Provider Policy and Procedure Manual Medicare DualChoice 07/14 MA_16A.14 &amp; Policy 16</td>
</tr>
<tr>
<td>Points Received</td>
<td>Total points earned from letters (p)-(r) above.</td>
<td>N/A</td>
</tr>
<tr>
<td>Points Possible</td>
<td>Total points possible from letters (p)-(r) above, excluding non-applicable elements.</td>
<td>N/A</td>
</tr>
<tr>
<td>Individual Score</td>
<td>Total points earned from letters (p)-(r) above divided by total points possible from letters (p)-(r) above, excluding non-applicable elements for each file.</td>
<td>N/A</td>
</tr>
<tr>
<td>Decision Timeliness CAP</td>
<td>Files that earn a “0” score for Decision Timeliness will produce an “X” in this cell. An “X” in this cell will result in a CAP for Decision Timeliness.</td>
<td>N/A</td>
</tr>
<tr>
<td>Member Language CAP</td>
<td>Files that earn a “0” score for Member Language will produce an “X” in this cell. An “X” in this cell will result in a CAP for Member Language.</td>
<td>N/A</td>
</tr>
<tr>
<td>Appropriate use of Criteria CAP</td>
<td>Files that earn a “0” score for Appropriate use of Criteria will produce an “X” in this cell. An “X” in this cell will result in a CAP for Appropriate use of Criteria.</td>
<td>N/A</td>
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<tr>
<td>Correct Template CAP</td>
<td>Files that earn a “0” score for Correct Template will produce an “X” in this cell. An “X” in this cell will result in a CAP for Correct Template.</td>
<td>N/A</td>
</tr>
</tbody>
</table>
### INLAND EMPIRE HEALTH PLAN
**LONG TERM CARE (LTC) DATA SHEET**

<table>
<thead>
<tr>
<th>IPA Name:</th>
<th>Date Submitted:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Report for Month of:</td>
<td>Submitted by:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Member Name</th>
<th>Member ID</th>
<th>Facility Name</th>
<th>Attending Physician</th>
<th>Reason for Admit (deconditioning, IVABX, wd care, etc.)</th>
<th>Admission/Enrollment Date</th>
<th>Last Cover Date (LCD)</th>
<th>Total SNF Days (Include past &amp; present days)</th>
<th>Prior Residence <em>See Legend:</em></th>
<th>Is Member at risk for custodial care? Why?</th>
<th>Member Remains Skilled or Custodial</th>
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*Legend:
BC = Board & Care
GH = Group Home
LA = Live Alone
AL = Assisted Living
HL = Homeless
SNF = Skilled Nursing Facility
**LTC FOLLOW-UP REVIEW**

Please fax completed form to your facility’s assigned IEHP Nurse.

All questions contained in this questionnaire are strictly confidential and will become part of the Member’s medical record.

<table>
<thead>
<tr>
<th>Name (Last, First, M.I.):</th>
<th>DOB:</th>
<th>Reference #:</th>
<th>ID #:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Activity Level:</strong></td>
<td><strong>Height:</strong></td>
<td><strong>Weight:</strong></td>
<td></td>
</tr>
<tr>
<td>DCP: □ LTC □ B&amp;C □ Home □ Home with HH □ Home with CBAS □ Home with IHSS/hr/mo</td>
<td>#hrs/month:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Cognitive Status Alert/ Oriented: □ x1 □ x2 □ x3 □ x4 |
| Criteria Met for Continued Stay: □ Yes □ No |
| Behavioral Change: □ Yes □ No |
| Dietary Change: □ Yes □ No |
| Medical Change: □ Yes □ No |
| Medication Change: □ Yes □ No |
| Skin Condition Change: □ Yes □ No |
| Any Falls Since Last Review: □ Yes □ No |
| Does SNF Facility Provide Transportation?: □ Yes □ No |

**CONTINUED CARE NEEDS**

**Resident Care Needs** (Check all conditions that apply):

- □ Chemo □ Eloper/Wanderer □ Ileostomy □ O2 □ Trach □ Surgical □ Pressure
- □ Colostomy □ Foley Cath □ Isolation □ Smoker □ Other: __________ □ Arterial #: __________
- □ Coma □ G/J Tube □ NG Tube □ Radiation □ Suctioning/Frequency: □ Venous Stage(s): __________
- □ Dialysis □ HHN □ NPO □ TPN □ Foot Wounds

<table>
<thead>
<tr>
<th>Activity Level</th>
<th>Bed Mobility □ Max □ Mod □ Min □ Assist □ Independent</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Supine to Sit □ Max □ Mod □ Min □ Assist □ Independent</td>
</tr>
<tr>
<td></td>
<td>Sit to Supine □ Max □ Mod □ Min □ Assist □ Independent</td>
</tr>
</tbody>
</table>

**Indicate all appropriate assistive device(s) Member uses:**

- □ Wheelchair □ Cane □ Walker □ Other
- □ Gait Distance x ___ ft.
- □ Wheelchair Mobility x ___ ft. □ Min □ Mod □ Max Assist □ Independent
- □ Safety/Balance □ Good □ Fair □ Poor
- □ Endurance □ Good □ Fair □ Poor
- □ Dressing Upper Body □ Min □ Mod □ Max Assist □ Independent
- □ Dressing Lower Body □ Min □ Mod □ Max Assist □ Independent
- □ Toileting □ Min □ Mod □ Max Assist □ Independent
- □ Bathing □ Min □ Mod □ Max Assist □ Independent
- □ Personal Hygiene □ Min □ Mod □ Max Assist □ Independent

**Treatment Goals Set:**

**Treatment Goals Met:**

**Comments/ Other (e.g. Specialty Consultation):**

**Updates to Discharge Plan:**

---

**Date of Review** | **Nurse Reviewer Printed Name** | **Nurse Reviewer Signature** | **Contact Phone Number**
LTC INITIAL REVIEW

Please fax completed form to your facility’s assigned IEHP Nurse.
All questions contained in this questionnaire are strictly confidential and will become part of the Member’s medical record.

Name (Last, First, M.I.):  DOB:  Reference #:  ID #:
Facility:  Height:  Weight:
Admit Dx:  Attending:
Admit Level of Care: □ Sub acute  □ Level 4  □ Level 3  □ Level 2  □ Level 1  □ Custodial
Co-Morbidities:
Admit Level of Care: □ Sub acute  □ Level 4  □ Level 3  □ Level 2  □ Level 1  □ Custodial
Justification for Level:
DCP: □ LTC  □ B&C  □ Home  □ Home with HH  □ Home with CBAS  □ Home with IHSS/hr/mo
#hrs/month:
Current Barriers to DCP:
Treatment Goals:
Family Training Goals:

Does Member Have an Advance Directive or Living Will?  □ Yes  □ No  DPOA:  Phone Number:
Does SNF Facility Provide Transportation?  □ Yes  □ No  □ Other:
Indicate Transportation Needs: □ O2  □ Cane  □ Gurney  □ Wheelchair

PATIENT SUPPORT/CAREGIVER

Name (Last, First, M.I.):  Relationship:
Address:  Email:
Party to Sign Contract:
Home Number:  Cell Number:  Work Number:

PERSONAL SAFETY & ACTIVITY LEVEL

Resident Care Needs (Check all conditions that apply):
Dietary Requirements/Restrictions:
  □ Chemo  □ Eloper/Wanderer  □ Ileostomy  □ O2  □ Trach
  □ Colostomy  □ Foley Cath  □ Isolation  □ Smoker  □ Other: __________
  □ Coma  □ G/J Tube  □ NG Tube  □ Radiation  □ Suctioning/Frequency:
  □ Dialysis/Days  □ HHN  □ NPO  □ TPN
Wounds
  □ Surgical  □ Pressure
  □ Arterial #:
  □ Venous Stage(s):
  □ Foot Wounds

Personal Safety
Does Member have stairs at home?  □ Yes  □ No  How Many:
Does Member experience frequent falls?  □ Yes  □ No
Does Member have vision or hearing loss?  □ Yes  □ No  □ Glasses  □ Hearing Aids
Indicate all appropriate assistive device(s) Member uses: □ Wheelchair
  □ Cane  □ Walker  □ Other
• Ambulation  x  ft.  □ Independent  □ Max Assist  □ Mod  □ Min
  □ Safety/Balance □ Good  □ Fair  □ Poor

Prior Level of Functioning:
Current Level of Functioning:
Discharge Plan:

MEDICATIONS (EXCLUDING PRN) PLEASE I INCLUDE SEPARATE SHEET, IF NECESSARY.

Name the Drug(s):  Strength:  Frequency Taken:

Date of Review  Nurse Reviewer Printed Name  Nurse Reviewer Signature  Contact Phone Number
Inland Empire Health Plan  
Pre-Contractual Audit Tool 2014  
Audit Preparation Instructions  
Medicare

The following standard forms should be complete and available at the time of the audit and are included in this packet:

- Biographical Information  
- Sub-Contracted Service by Facility/Agency

Prepare for the audit by having the following information available:

- **All sections** of the DOA tool documented with **road mapping** instructions for each element  
- Organizational chart(s)  
- Current job descriptions as relevant to audit  
- Delegation agreements with any sub-delegated provider

The following is a list of items needed to prepare for the Offsite and Onsite audit.

### Quality Management

- Program, Plan and Description *(Desk Review)*
- Committee meeting minutes from last 12 months to include agenda, sign-in sheet (attendance) and signed confidentiality statement: *(Desk Review or On-site Review)*:
  - Quality Improvement Committee, and
  - Subcommittee
- Annual Work Plan *(Desk Review)*
- Annual QM Program Evaluation *(Desk Review)*
- Semi-Annual Reports for Health Plan *(Desk Review)*
- Standards of Medical Care Access Policy and Procedure *(Desk Review)*

### Utilization Management

- Program, Plan and Description *(Desk Review)*
- Policies and procedures *(Desk Review)*
- Committee minutes from last 12 months: *(On-site Review)*
  - Board of Directors
  - Utilization Management Committee, and
  - Subcommittee meeting minutes
- Annual Inter-Rater Reliability Audit *(On-site Review)*
- Two examples that demonstrate the use of Board Certified consultants to assist with determinations *(On-site Review)*
- Annual UM Program Evaluation *(Desk Review)*
Inland Empire Health Plan
Pre-Contractual Audit Tool 2014
Audit Preparation Instructions

Medicare

- Criteria for Length of Stay and Medical Necessity used during the past 2 years (On-site Review)
- 20 approved pre-certification requests with all required attachments (On-site Review)
- 20 denied requests with all required attachments (On-site Review)
- Evidence that the Affirmative Statement has been distributed to providers and employees who make UM decisions (On-site Review)
- Evidence, other than via a denial letter, that the providers have been notified that they may contact a physician reviewer to discuss denial decisions (Desk or On-site Review)*
- Provider communications from last 12 months (On-site Review)
- Semi-Annual Reports for last 12 months (Desk Review)*
- Evidence of current license for Providers and Employees (RN, LVN) who make UM Decisions (On-site Review)

Care Management

- Applicable policies and procedures (Desk Review)*
- Complex Case Management Policy and Procedure (Desk Review)*
- CM and CCS logs that reflect evidence that the Member has received care management services (On-site Review)
- 5 randomly pulled CM files with care plans (On-site Review)
- 5 randomly pulled CCM files with care plans (On-site Review)
- 5 randomly pulled CCS files (On-site Review)

Credentialing

- Policies and procedures (Desk Review)*
- Committee meeting minutes from last 12 months: (On-site Review)
  - Board of Director
  - Quality Management Committee minutes
  - Credentialing Committee minutes
  - Peer Review Committee minutes
- Credentialing Files– 25 randomly selected files including PCP, Specialists, Mid-Levels and Urgent Care Providers (On-site Review)
- Re-credentialing Files – 25 randomly selected files including PCP, Specialists, Mid-Levels and Urgent Care Providers (On-site Review)
- Practitioner files of those terminated for quality issues (On-site Review)
- Practitioner files that have appealed a decision (On-site Review)
- Home Health files (On-site Review)
Inland Empire Health Plan
Pre-Contractual Audit Tool 2014
Audit Preparation Instructions

Medicare

• Skilled Nursing files (On-site Review)
• Laboratory files (On-site Review)
• Free Standing Surgical Center Files (On-site Review)
• Medical Office Site Review worksheets, tools and summaries (On-site Review)
• Medical Record worksheets, tools and summaries (On-site Review)
• Credentialing delegation data, if applicable (On-site Review)
• Health Delivery Organization Tracking Mechanism for Expirables (On-site Review)

Member Communications Marketing (If Applicable)

• All Member Communication for Marketing, Enrollment, and Disenrollment (Desk Review)*

Claims

• Policies and procedures (Desk Review)*
• Contracts Boilerplate for: (Desk Review)*
  - PCPs
  - Specialists
  - Ancillary Providers
  - Hospitals
• Blinded Claims Sample: (Desk Review)*
  - 15 Paid (Details Attached)
  - 5 Denied (Details Attached)
  - 5 Redetermined (Details Attached)
  - 5 Reconsidered (Details Attached)
• Sample Reports and Logs: (Desk Review)*
  - Paid Claims (Details Attached)
  - Denied Claims (Details Attached)
  - Redetermined Claims (Details Attached)
  - Reconsidered Claims (Details Attached)
  - Pended Claims (Details Attached)
  - Open Claims/Inventory (Details Attached)
  - Overpayments (Details Attached)
  - Check Mailing Attestation Log (Details Attached)
  - Redirected Claims (Details Attached)

• Claims Processing Systems Review (On-site Review)
• Operational Review (On-site Review)
Compliance

- Compliance Policies and procedures (Desk Review)*
- Fraud, Waste and Abuse Policies and procedures (Desk Review)*
- HIPAA Policies and procedures (Desk Review)*

Note: *- Denotes items to be sent to IEHP for desk review prior to the audit.
<table>
<thead>
<tr>
<th>IPA Auth/Tracking number</th>
<th>Member Name</th>
<th>IEHP ID Number</th>
<th>Member DOB</th>
<th>Acuity of Referral*</th>
<th>Reason for Referral/DX</th>
<th>Service/Activity Requested</th>
<th>Date Rec'd from IPA</th>
<th>Requesting provider</th>
<th>Requested provider</th>
<th>Requested Prov Specialty</th>
<th>Referral decision**</th>
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</table>

*Acuity of Referral: Urgent or Routine  
**Decision: Approved, Modified, or Denied
## REQUEST FOR UM CRITERIA LOG

**Submitted by:** __________________________

**Log for Year:** __________________________

| Date Requested | Date Sent | Sent via: F = fax  
EM = email  
GM = ground mail | Name of the Requesting Practitioner or Member | Member Name and IEHP ID # | Line of Business (MC, CMC) | Criteria Requested (i.e. InterQual-MRI Brain) | Reason for Request | Medical Necessity | Benefit | Curve-Out | Out-of-Network |
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**Legend:**
- F = Fax  
- EM = email  
- GM = Ground  
- MC = Medi-Cal  
- CMC = IEHP DualChoice Cal MediConnect Plan (Medicare-Medicaid Plan)  

Revised 07/2015
IEHP DualChoice Cal MediConnect Plan (Medicare – Medicare – Medicaid Plan)

<Date>

<Name>
<Address>
<Address>

RE: Request for Utilization Management (UM) Criteria

Dear <Name>:

Attached is the clinical guideline or criteria used for determining health care services specific for the procedure or condition requested.

The materials provided to you are guidelines used by the plan to authorize, modify, or deny services for Members with a similar illness or condition. Specific care and treatment may vary depending on individual needs and the benefits covered under your health plan.

Sincerely,

<Utilization Management Department>
INLAND EMPIRE HEALTH PLAN
SECOND OPINION TRACKING LOG

IPA Name: ____________________________ Date Submitted: ____________________________

Report for Month of: ____________________________ Submitted by: ____________________________

<table>
<thead>
<tr>
<th>Member Name and IEHP ID #</th>
<th>Name of the Requesting Practitioner or Member</th>
<th>Diagnosis</th>
<th>Reason for Second Opinion (use codes below)</th>
<th>Request Date</th>
<th>Decision Date</th>
<th>Decision Code (circle one)</th>
<th>Second Opinion to be provided by (name):</th>
<th>Date of Appoint.</th>
<th>Date Consult Report Received</th>
<th>*See Legend Below For Member Type</th>
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<td>Denied</td>
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</table>

Second Opinion Reason Codes:
Reason 1: The Member questions the reasonableness or necessity of recommended surgical procedures.
Reason 2: The Member questions a diagnosis or plan or care for a condition that threatens loss of life, loss of limb, loss of bodily function, or substantial impairment including but not limited to a serious chronic condition.
Reason 3: If clinical indications are not clear or are complex and confusing, a diagnosis is questionable due to conflicting test results, or the treating PCP/Specialist is unable to diagnose the condition and the Member requests an additional diagnosis.
Reason 4: If the treatment plan in progress is not improving the medical condition of the Member within an appropriate time period given the diagnosis and plan of care, and the Member requests a second opinion regarding the diagnosis or continuance of the treatment.
Reason 5: The Member has attempted to follow the plan of care or consulted with the initial physician concerning serious concerns about the diagnosis or plan of care.

Legend: CMC = IEHP DualChoice Cal MediConnect
NS = Non-State
SPECIALTY OFFICE SERVICE AUTHORIZATION SETS

These procedures are to be performed in the office only. Specialty referral includes consult and one (1) follow-up visit unless otherwise noted and may include:

<table>
<thead>
<tr>
<th>Procedure</th>
<th>CPT Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allergy - Skin Testing for 80 or Fewer Tests</td>
<td>95004 X up to 80</td>
</tr>
<tr>
<td>CARD – EKG (Adult &amp; Peds)</td>
<td>93000</td>
</tr>
<tr>
<td>CARD – Routine Stress Treadmill (Adult)</td>
<td>93015</td>
</tr>
<tr>
<td>CARD – Holter Monitor (Adult &amp; Peds)</td>
<td>93235</td>
</tr>
<tr>
<td>CARD – Echocardiogram (Peds only)</td>
<td>93303 or 93307 + 93320 + 93325</td>
</tr>
<tr>
<td>DERM – Punch Biopsy</td>
<td>11100</td>
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<tr>
<td>DERM – Cryotherapy of Lesions</td>
<td>17000, 17003, 17110</td>
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<tr>
<td>DERM – Excision of Nail &amp; Nail Matrix</td>
<td>11750</td>
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<tr>
<td>NEURO - EEG Standard</td>
<td>95816 or 95819</td>
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<tr>
<td>ENDO – Urinalysis</td>
<td>81003 or 82948</td>
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<tr>
<td>ENDO – Glucose/Blood</td>
<td>82947</td>
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<tr>
<td>ENDO – Fine Needle Aspiration of Thyroid</td>
<td>10021-10022</td>
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<tr>
<td>ENT – Tympanogram</td>
<td>92567</td>
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<tr>
<td>ENT – Pure Tone Audiogram</td>
<td>92557, 92582</td>
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<tr>
<td>ENT – Cerumen Removal</td>
<td>69210</td>
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<tr>
<td>ENT – Nasal Cauterization Treatment of Epistaxis (Anterior or Posterior)</td>
<td>30901, 30905</td>
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<tr>
<td>ENT – Nasal Endoscopy</td>
<td>31231, 31238</td>
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<tr>
<td>ENT – Removal of Foreign Body Ear or Nose</td>
<td>69200, 30300</td>
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<tr>
<td>ENT – Streptococcus A Screen</td>
<td>87880</td>
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<tr>
<td>Gastroenterology – Flex Sigmoidoscopy</td>
<td>45330</td>
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<tr>
<td>GYN – Urine Pregnancy Test</td>
<td>81025</td>
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<tr>
<td>GYN – Depo-Provera</td>
<td>X6051</td>
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<tr>
<td>GYN – Abnormal Pap Follow-Ups and:</td>
<td>99213-99215 (X 3)</td>
</tr>
<tr>
<td>Procedure</td>
<td>CPT Code</td>
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<tr>
<td>Colposcopy with Biopsy</td>
<td>57452 or 57454-455, 57460</td>
</tr>
<tr>
<td>Endometrial Biopsy</td>
<td>58100, 58558</td>
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<tr>
<td>LEEP</td>
<td>57460</td>
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<tr>
<td>Hematology - Bone Marrow Bx and/or Aspiration</td>
<td>38221, 38220</td>
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<tr>
<td>Hematology – Blood Smears</td>
<td>86007-85008</td>
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<tr>
<td>Nephrology – Urinalysis</td>
<td>8100-81003</td>
</tr>
<tr>
<td>Orthopedics – Total Fracture Care (Watch for CCS) X 6 mos.</td>
<td>By site of injury By date of service</td>
</tr>
<tr>
<td>Orthopedics – X-Rays, in office simple extremity</td>
<td>73000-73140</td>
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<tr>
<td>Orthopedics – Casting, Splints</td>
<td></td>
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<tr>
<td>Orthopedics – DME (boot, shoe, crutches)</td>
<td></td>
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<tr>
<td>Orthopedics – Joint aspiration</td>
<td>20600-20615</td>
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<tr>
<td>Orthopedics – Trigger point injections</td>
<td></td>
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<tr>
<td>Injection of Tendon &amp; Ligament</td>
<td>20550-20553</td>
</tr>
<tr>
<td>Injection of Bursa</td>
<td>20600, 20605, 20610</td>
</tr>
<tr>
<td>Podiatry – Matrixectomy</td>
<td>11750</td>
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<tr>
<td>Podiatry – Debridement of Nails</td>
<td>11720-11721</td>
</tr>
<tr>
<td>Pulmonary – Spirometry</td>
<td>94010, 94060</td>
</tr>
<tr>
<td>Pulmonary – Blood Gases</td>
<td>82800-82810</td>
</tr>
<tr>
<td>Radiology - Mammogram</td>
<td>77057</td>
</tr>
<tr>
<td>- Breast Ultrasound @ radiologist suggestion</td>
<td>76645</td>
</tr>
<tr>
<td>- Cone View</td>
<td>77055</td>
</tr>
<tr>
<td>Rheumatology – T.P Injection</td>
<td>20552</td>
</tr>
<tr>
<td>Rheumatology – Injection of Tendon &amp; Ligament</td>
<td>20550-20553</td>
</tr>
<tr>
<td>Rheumatology – Joint Aspiration</td>
<td>20600-20615</td>
</tr>
<tr>
<td>Surgery – Breast Biopsy</td>
<td>77031</td>
</tr>
<tr>
<td>Surgery – I &amp; D of Cutaneous Abscess</td>
<td>10060-10061</td>
</tr>
<tr>
<td>Urology – Urinalysis</td>
<td>81000-81003</td>
</tr>
<tr>
<td>Urology - Cystoscopy</td>
<td>52000</td>
</tr>
</tbody>
</table>
IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan)
Standing Referral / Extended Access Referral to Specialty Care Request

<table>
<thead>
<tr>
<th>Health Plan</th>
<th>Date of Request</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>IPA/MG</th>
<th>PCP</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Phone #</th>
<th>Phone #</th>
<th>FAX</th>
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<table>
<thead>
<tr>
<th>Requesting MD</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Phone #</th>
<th>FAX</th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>Other Insurance</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Member Name</th>
<th>DOB</th>
<th>M  F</th>
<th>Phone #</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Address</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>City</th>
<th>State</th>
<th>ZIP</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Member ID</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Eligibility Reviewed Thru</th>
<th>Medi-Cal AEVS Confirmation #</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Policy/Group #</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Referral To (Physician Name)</th>
<th>Type of Specialist</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Phone #</th>
<th>FAX</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Diagnosis Primary</th>
<th>ICD 10</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Diagnosis Secondary</th>
<th>ICD 10</th>
</tr>
</thead>
</table>

**Practitioner Treatment Plan** (Complete or attach)

<table>
<thead>
<tr>
<th># Visits/Period</th>
<th>Visits/3 Months</th>
<th>Visits/6 Months</th>
<th>Visits/9 Months</th>
<th>Visits/1 Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time Requested (fill in number of visits)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Reviewed 07/2013
Briefly, describe what is anticipated on each visit:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

When was the diagnosis first made?__________________________________________

How many times has the patient been seen by the specialist in the past year?________

Additional information regarding treatment plan may be requested from the specialist if necessary. If so, decision will be made within 3 business days of receipt of the information.

<table>
<thead>
<tr>
<th>REVIEW COMMITTEE USE ONLY:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Does diagnosis meet the criteria of long term, life threatening, degenerative, disabling disease or complex medical condition?</td>
</tr>
<tr>
<td>• Is specialist in the plan network?</td>
</tr>
</tbody>
</table>

If out of network, is contract between plan and specialist obtained? Y __________ N __________.

Date ________________.

# Visits/Period of Time:______________________.

Date Medical Information Received:______________________.

Approved Date:______________. Modified Date:______________. *Denied Date:______________.

Authorized by ________________________, M.D.

Medical Director or Designee

* If denied, indicate the reason for denial and alternatives suggested. Include this information in the denial letter.

Authorization #__________________.

Decision made within 3 business days of receipt. Y __________ N __________.

Date Valid From:__________________. Thru:__________________.

Notification Date: To Requesting Practitioner ________________.

To PCP ________________.

To Specialist Consultant ________________.

To Member ________________.

By FAX ____. Letter ____.

By FAX ____. Letter ____.

By FAX ____. Letter ____.

By FAX ____. Letter ____.

Authorization remains valid only if Member is eligible.

Payment is contingent upon the patient’s eligibility at the time service is rendered.
## Utilization Management Timeliness Standards

### Centers for Medicare and Medicaid Services (CMS)

<table>
<thead>
<tr>
<th>Type of Request</th>
<th>Decision</th>
<th>Notification Timeframes</th>
</tr>
</thead>
</table>
| **Standard Initial Organization Determination (Pre-Service)** - If No Extension Requested or Needed | As soon as medically indicated, within a maximum of fourteen (14) calendar days after receipt of request. | Within fourteen (14) calendar days after receipt of request.  
- Use the Integrated Denial Notice (IDN) also known as Notice of Denial of Medical Coverage template for written notification of denial decision. |
| **Standard Initial Organization Determination (Pre-Service)** - If Extension Requested or Needed | May extend up to fourteen (14) calendar days.  
**Note:** Extension allowed only if member requests or the provider / organization justifies a need for additional information and is able to demonstrate how the delay is in the interest of the member (for example, the receipt of additional medical evidence from non-contracted providers may change a decision to deny). Extensions must not be used to pend organization determinations while waiting for medical records from contracted providers. | - Use the MA-Extension: Standard & Expedited to notify member and provider of an extension.  
**Extension Notice:**  
- Give notice in writing within fourteen (14) calendar days of receipt of request. The extension notice must include:  
  1) The reasons for the delay  
  2) The right to file an expedited grievance (oral or written) if they disagree with the decision to grant an extension.  
**Note:** The Health Plan must respond to an expedited grievance within twenty-four (24) hours of receipt.  
**Decision Notification After an Extension:**  
- Must occur no later than expiration of extension. Use the IDN also known as Notice of Denial of Medical Coverage template for written notification of denial decision. |
| **Expedited Initial Organization Determination** - If Expedited Criteria are not met | Promptly decide whether to expedite – determine if:  
1) Applying the standard timeframe could seriously jeopardize the life or health of the member or the member’s ability to regain maximum function, or  
2) If a physician (contracted or non-contracted) is requesting an expedited decision (oral or written) or is supporting a member’s request for an expedited decision.  
If submitted as expedited but determined not to be expedited, then standard initial organization determination timeframe applies: | If request is not deemed to be expedited, give the member prompt (within seventy-two (72) hours) oral notice of the denial of expedited status including the member’s rights followed by written notice within three (3) calendar days of the oral notice.  
- Use the MA Expedited Criteria Not Met template to provide written notice. The written notice must include:  
  1) Explain that the Health Plan will automatically transfer and process the request using the fourteen (14)-day timeframe for standard determinations;  
  2) Inform the member of the right to file an expedited grievance if he/she disagrees with the organization’s decision not to expedite the determination;  
  3) Inform the member of the right to resubmit |
### Utilization Management Timeliness Standards

**Centers for Medicare and Medicaid Services (CMS)**

<table>
<thead>
<tr>
<th>Type of Request</th>
<th>Decision</th>
<th>Notification Timeframes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Automatically transfer the request to the standard timeframe.</td>
<td>a request for an expedited determination and that if the member gets any physician’s support indicating that applying the standard timeframe for making determinations could seriously jeopardize the life or health of the member, or the member’s ability to regain maximum function, the request will be expedited automatically; and</td>
</tr>
<tr>
<td></td>
<td>• The fourteen (14) day period begins with the day the request was received for an expedited determination.</td>
<td>4) Provide instructions about the expedited grievance process and its timeframes.</td>
</tr>
<tr>
<td>Expedited Initial Organization Determination</td>
<td>As soon as medically necessary, within seventy-two (72) hours after receipt of request (includes weekends &amp; holidays).</td>
<td>Within seventy-two (72) hours after receipt of request.</td>
</tr>
<tr>
<td></td>
<td>- If No Extension Requested or Needed</td>
<td>- Approvals</td>
</tr>
<tr>
<td></td>
<td>(See footnote)(^1)</td>
<td>- Oral or written notice must be given to member and provider within seventy-two (72) hours of receipt of request.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Document date and time oral notice is given.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- If written notice only is given, it must be received by member and provider within seventy-two (72) hours of receipt of request.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Denials</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- When oral notice is given, it must occur within seventy-two (72) hours of receipt of request and must be followed by written notice within three (3) calendar days of the oral notice.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Document date and time of oral notice.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- If only written notice is given, it must be received by member and provider within seventy-two (72) hours of receipt of request.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Use NDMC template for written notification of a denial decision.</td>
</tr>
</tbody>
</table>

\(^1\) Note: Health Plans may have referral requirements that may impact timelines. When processing expedited requests, groups must factor in the time it may take to refer the request to the health plan in the total seventy-two (72) hours to ensure that expedited requests are handled timely.
### Type of Request

<table>
<thead>
<tr>
<th>Decision</th>
<th>Notification Timeframes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Expedited Initial Organization Determination</strong> - If Extension Requested or Needed</td>
<td>May extend up to fourteen (14) calendar days.</td>
</tr>
</tbody>
</table>
| **Note:** Extension allowed *only* if member requests or the provider / organization justifies a need for additional information and is able to demonstrate how the delay is in the interest of the member (for example, the receipt of additional medical evidence from non-contracted providers may change a decision to deny). Extensions *must not* be used to pend organization determinations while waiting for medical records from contracted providers. When requesting additional information from non-contracted providers, the organization must make an attempt to obtain the information within twenty-four (24) hours of receipt of the request. This attempt may be verbal, fax or electronic. The Extension Notice may be used to satisfy this requirement if it is delivered within twenty-four (24) hours (e.g., fax or e-mail to provider). The attempt must be documented in the request file (e.g., copy of e-mail, confirmation of fax, or date/time of verbal request). Documentation of the attempt within twenty-four (24) hours does not replace the requirement to send the written Extension Notice within seventy-two (72) hours if requested information is not received timely. | - Use the MA-Extension: Standard & Expedited template to notify member and provider of an extension. 

**Extension Notice:**
- Give notice *in writing*, within seventy-two (72) hours of receipt of request. The extension notice must include:
  1) The reasons for the delay
  2) The right to file an expedited grievance (oral or written) if they disagree with the decision to grant an extension.

**Note:** The Health Plan must respond to an expedited grievance within twenty-four (24) hours of receipt. |
| **Decision Notification After an Extension:** |
| **Approvals** | - Oral or written notice must be given to member and provider no later than upon expiration of extension. |
| - Document date and time oral notice is given. |
| - If written notice *only* is given, it must be *received* by member and provider no later than upon expiration of the extension. |
| **Denials** | - When oral notice is given, it must occur no later than upon expiration of extension and must be followed by written notice within three (3) calendar days of the oral notice. |
| - Document date and time of oral notice. |
| - If only written notice is given, it must be *received* by member and provider no later than upon expiration of extension. |
| - Use NDMC template for written notification of a denial decision. |
## Type of Request

<table>
<thead>
<tr>
<th>Decision</th>
<th>Important Message from Medicare (IM)</th>
<th>Detailed Notice of Discharge (DND)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Hospital Discharge Appeal Notices (Concurrent)</strong></td>
<td>Attending physician must concur with discharge decision from inpatient hospital to any other level of care or care setting. Continue coverage of inpatient care until physician concurrence obtained. Hospitals are responsible for valid delivery of the revised Important Message from Medicare (IM): 1) within two (2) calendar days of admission to a hospital inpatient setting. 2) not more than two (2) calendar days prior to discharge from a hospital inpatient setting. Health Plans or delegates are responsible for delivery of the Detailed Notice of Discharge (DND) when a member appeals a discharge decision. DND must be delivered as soon as possible but no later than noon of the day after notification by the QIO (Quality Improvement Organization).</td>
<td>Upon notification by the QIO that a member or representative has requested an appeal, the Health Plan or delegate must issue the DND to both the member and QIO as soon as possible but no later than noon of the day after notification by the QIO. The DND must include: • A detailed explanation of why services are either no longer reasonable and necessary or are no longer covered. • A description of any applicable Medicare coverage rules, instructions, or other Medicare policy, including information about how the member may obtain a copy of the Medicare policy from the MA organization. • Any applicable Medicare health plan policy, contract provision, or rationale upon which the discharge determination was based. • Facts specific to the member and relevant to the coverage determination sufficient to advise the member of the applicability of the</td>
</tr>
<tr>
<td>Type of Request</td>
<td>Decision</td>
<td>Important Message from Medicare (IM)</td>
</tr>
<tr>
<td>----------------</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of Request</th>
<th>Decision</th>
<th>Notice of Medicare Non-Coverage (NOMNC) Notification</th>
<th>Detailed Explanation of Non-Coverage (DENC) Notification</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Termination of Provider Services:</strong></td>
<td>The Health Plan or delegate is responsible for making the decision to end services no later than two (2) calendar days or two (2) visits before coverage ends:</td>
<td>The SNF, HHA or CORF is responsible for delivery of the NOMNC to the member or authorized representative</td>
<td>Upon notification by the Quality Improvement Organization (QIO) that a member or authorized representative has requested an appeal:</td>
</tr>
<tr>
<td></td>
<td>- Skilled Nursing Facility (SNF)</td>
<td>- The NOMNC must be delivered no later than two (2) calendar days or two (2) visits prior to the proposed termination of services and must include: member name, delivery date, date that coverage of services ends, and QIO contact information.</td>
<td>- The Health Plan or delegate must issue the DENC to both the QIO and member no later than close of business of the day the QIO notifies the Health Plan of the appeal:</td>
</tr>
<tr>
<td></td>
<td>- Home Health Agency (HHA)</td>
<td>- A determination that such services are no longer medically necessary</td>
<td>- The NOMNC may be delivered earlier if the date that coverage will end is known.</td>
</tr>
<tr>
<td></td>
<td>- Comprehensive Outpatient Rehabilitation Facility (CORF)</td>
<td></td>
<td>- If expected length of stay or service is two (2) days or less, give notice on admission.</td>
</tr>
</tbody>
</table>

**Note:** This process does not apply to SNF Exhaustion of Benefits (100 day limit).

Note: Check with Health Plan or delegate for delegated responsibility, as a Health Plan or delegate may choose to deliver the NOMNC instead of the provider.