25. DELEGATION AND OVERSIGHT

A. Delegation Oversight
   1. Delegated Activities

APPLIES TO:

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

POLICY:

A. Annually, IEHP evaluates and audits contracted Delegates in accordance with current applicable National Committee for Quality Assurance (NCQA) accreditation standards, Centers for Medicare and Medicaid Services (CMS) regulatory requirements, Department of Health Care Services (DHCS) regulatory requirements, and IEHP standards, modified on an as needed basis.

B. Delegates agree to be accountable for all responsibilities delegated by IEHP and oversight of any sub-delegated activities.

C. Delegates agree to provide periodic reports to IEHP as specified in the Delegation Agreement.

D. In the event deficiencies are identified through this oversight, Delegates will provide a specific corrective action plan acceptable to IEHP within a specified timeframe.

E. IEHP monitors Delegates’ compliance with reporting requirements on a monthly basis.

DEFINITION:

A. Delegate is defined as an organization authorized to perform certain functions on IEHP’s behalf.

PROCEDURES:

A. IEHP performs an initial, monthly and annual audits of the following Delegated IPA Activities:
   1. Quality Management;
   2. Utilization Management;
   3. Credentialing and Re-credentialing;
   4. Compliance;
   5. Care Management;
   6. Claims Process and Payment; and
   7. Financial Viability.

B. Each of the above activities describes the elements being evaluated, the frequency of the reporting requirements, and the period of time being evaluated.
25. DELEGATION AND OVERSIGHT

A. Delegation Oversight
   1. Delegated Activities

1. For each activity, IEHP has identified its expectations and reporting requirements to be achieved (See Attachments, “Delegated IPA Delegation Agreement – IEHP DualChoice” and “Medicare Provider Reporting Requirements Schedule” in Section 25).

C. If Delegates are unable to correct or comply with the corrective action plan within the specified timeframe, IEHP will take necessary steps up to and including revocation of delegation in whole and in part or possible termination.

D. IEHP meets with Delegates to discuss the results of audits and presents all relevant supporting documentation. Meeting date and location to be specified by IEHP.

E. Delegates can appeal the results of any oversight activity, specialized study, audit and any required CAPs or sanctions to IEHP within thirty (30) calendar days of receiving their results. Delegates must cite reasons for their appeal, including disputed items or deficiencies.
25. DELEGATION AND OVERSIGHT

A. Delegation Oversight
   2. Audit

APPLIES TO:

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

POLICY:

A. IEHP delegates certain Utilization Management (UM), Care Management (CM), Credentialing/Re-credentialing activities and activities for Quality Management (QM) and Compliance to contracted IPAs that meet IEHP delegation requirements and comply with the most current National Committee for Quality Assurance (NCQA), Department of Health Care Services (DHCS) (when applicable), Centers for Medicare and Medicaid Services (CMS), and IEHP Standards.

B. IEHP does not delegate QM, Preventive Health, Medical Records, Compliance or Member’s Rights and Responsibilities to non-NCQA accredited entities; however, IEHP does require contracted IPAs to perform specific activities related to these areas.

C. IEHP monitors IPA performance in QM, UM, Credentialing/Re-credentialing, Compliance, CM and Claims their implementation of related activities through the Delegation Oversight Audits performed on an annual basis.

D. IEHP may waive elements of the audit for NCQA accredited entities.

E. The Delegation Oversight Audit is used as part of the pre-contractual audit for delegating to IPAs applying for participation with IEHP.

F. The Delegation Oversight Audits are performed by IEHP Provider Services, Compliance, Credentialing, QM, UM, Claims and CM Delegation Oversight Staff using the most current NCQA, DHCS, CMS and IEHP standards.

G. Focused audits may be performed as indicated whenever a quality issue is identified or at the discretion of the Delegation Oversight Committee, Compliance Officer or the IEHP Chief Medical Officer.

H. IEHP reserves the right to revoke delegated responsibilities and take other necessary action up to and including termination of contract from those IPAs that fail to meet IEHP requirements.

PROCEDURES:

A. IEHP audits each IPA prior to contracting and at least annually to verify compliance with IEHP requirements and continued ability to perform delegated functions.

B. IEHP is responsible for performing the Delegation Oversight Audit utilizing the most current DHCS, NCQA, CMS, and IEHP standards.
25.  DELEGATION AND OVERSIGHT

A.  Delegation Oversight
   2.  Audit

C.  The Delegation Oversight Audit evaluates the IPA capabilities in UM, CM, Credentialing and elements of QM and Compliance.

D.  IEHP is responsible for coordinating and scheduling the audits with IPA staff.

E.  IEHP notifies the IPA in writing, at least four (4) weeks in advance of the scheduled audit. The IPA receives audit preparation instructions (See Attachment, “Delegation Oversight Audit Preparation Instructions – IEHP DualChoice” in Section 25) regarding the types of documents to be available at the time of the audit and standard forms to be completed and returned to IEHP prior to the audit.

1.  IPA Biographical Information (See Attachment, “IPA Biographical Information Sheet” in Section 25).

2.  IPA Sub-Contracted Service by Facility/Agency (See Attachment, “Subcontracted Facility/Agency Services and Delegated Functions” in Section 25).

3.  QM documents:
   a.  Program, Plan, and Description;
   b.  Committee and subcommittee meeting minutes, agenda, sign in sheet, and signed confidentiality statement from the last twelve (12) months for;
      1)  Quality Management Committee; and
      2)  Subcommittees.
   c.  Annual Work Plan;
   d.  Annual Program Evaluation;
   e.  Semi-Annual Health Plan Reports for the last twelve (12) months;
   f.  Notification of Termination policy and evidence that Members were notified of practitioner termination;
   g.  Studies, Audits and Surveys completed during the last twelve (12) months; and
   h.  Standards of Medical Care Access Policies and Procedures.

4.  UM documents:
   a.  Program, Plan and Description;
   b.  Annual Work Plan;
   c.  Annual Evaluation;
   d.  Policies and Procedures;
   e.  Referral Universe for audit file selection;
   f.  Committee meeting minutes from last twelve (12) months for:
25. DELEGATION AND OVERSIGHT

A. Delegation Oversight

2. Audit

1) Board of Directors;
2) Utilization Management Committee; and
3) Subcommittee meeting minutes.

g. Annual Inter-Rater Reliability Audit;

h. Semi-Annual Health Plan Reports for the last twelve (12) months;

i. Two (2) examples that demonstrate the use of board-certified consultants to assist with determinations;

j. Criteria for Length of Stay and Medical Necessity used during the past two (2) years;

k. Fifteen (15) Approved, Denied, and Cancelled files selected by IEHP;

l. Utilization Management statistics from last twelve (12) months;

m. Evidence that the Affirmative Statement has been distributed to Providers and employees who make UM decisions;

n. Evidence, other than via a denial letter, that the Providers have been notified that they may contact a Physician reviewer to discuss denial decisions;

o. Provider communications from last twelve (12) months; and

p. Evidence of current license for Providers (Doctor of Medicine (MD)/ Doctor of Osteopathic Medicine (DO)) and Employees (Registered Nurse (RN), Licensed Vocational Nurse (LVN)) who make UM Decisions.

5. Care Management documents:

a. Program Plan and Description and CM policies and procedures, including Case Management, Guidelines for Care Management and Care Transitions (if different from UM);

b. Care Management logs: (IEHP will utilize previously submitted logs);

c. Five (5) sample cases of Carve Out/ Waiver Programs/ Termination of PCP/ Specialist Member letters;

d. Thirty (30) CM files; and

e. Documentation of coordination of care with county mental health clinics for Members receiving specialty mental health services in accordance with California-specific measure CA1.7 on Care Coordination. Please see Provider Policy MA_25F1, “Medicare MMP Reporting Requirements – IEHP DualChoice” for more information.

6. Credentialing documents:

a. Policies and Procedures;
25. DELEGATION AND OVERSIGHT

A. Delegation Oversight
   2. Audit

b. Committee meeting minutes including date and voting attendees from the last twelve (12) months, including:
   1) Board of Directors;
   2) Quality Management Committee minutes;
   3) Credentialing; and
   4) Peer Review.

c. Credentialing and re-credentialing files – five percent (5%) or a minimum of thirty (30) credentialing and thirty (30) re-credentialing files randomly selected by IEHP;

d. Practitioner files of those terminated for quality issues;

e. Practitioner files that have appealed a decision;

f. Health Care Delivery Organization files where the IPA is responsible for claims payment for those Organizational Providers, which include but are not limited to:
   1) Hospitals
   2) Home Health Agencies
   3) Skilled Nursing Facilities
   4) Free-Standing Surgical Centers
   5) Hospices
   6) Clinical Laboratories
   7) Comprehensive Outpatient Rehabilitation Facilities (CORF)
   8) Outpatient Physical Therapy Providers
   9) Outpatient Speech Pathology Providers
   10) End-State Renal Disease Services Providers
   11) Outpatient Diabetes Self-Management Training Providers
   12) Portable X-Ray Suppliers
   13) Rural Health Clinics
   14) Federally Qualified Health Centers (FSHC)

g. Credentialing delegation data, if applicable;

h. Health Care Delivery Organization Tracking mechanism for expirables must be assessed at least every three (3) years;

i. Documentation of ongoing monitoring of sanctions, complaints, and quality issues for the past twelve (12) months;
25. DELEGATION AND OVERSIGHT

A. Delegation Oversight

2. Audit

j. Human Immunodeficiency Virus (HIV/AIDS) Annual Survey to include the written process. Evidence of Implementation and Distribution of Findings; and

k. Delegation Agreements between the IPA and Sub-delegate(s).

7. Compliance Documents:
   a. Compliance Policies & Procedures;
   b. Fraud, Waste and Abuse (FWA) Policies and Procedures;
   c. Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Polices & Procedures; and
   d. Standards of Conduct.

8. Other general organizational documents:
   a. Organizational chart(s);
   b. Current job descriptions relevant to audit;
   c. Delegation agreements with any subcontracted practitioner, or entity to which the IPA subcontracts any function (i.e. UM, Credentialing); and
   d. Ownership and Control documentation submitted annually to IEHP.

9. Provider Directory (applies to Kaiser Permanente, Delta Dental, and American Specialty Health (ASH)):
   a. Report during the lookback period of the annual audit of identified/reported inaccuracies and the timeframe of the correction in compliance with California Health and Safety Code § 1367.27.

F. In preparation for the audit the IPA should:
   1. Familiarize themselves with DHCS, NCQA, CMS, and IEHP specific standards; and
   2. Audit themselves to make sure they meet the standards.

G. All IPAs are to provide a written roadmap of where each element is located in the policies and procedures. All sections of the audit tool must be road mapped prior to the reviewers going on site.

H. At the time of the audit, the IPA must have:
   1. All requested documents ready; and
   2. Have appropriate staff available for each functional area that is being audited (the staff need not be present with the auditors for the entire audit).

I. At the time of the audit, IEHP reviews:
25. DELEGATION AND OVERSIGHT

A. Delegation Oversight

2. Audit

1. The IPA policies and procedures for completeness and compliance with DHCS, NCQA, CMS, and IEHP standards;

2. Committee and Subcommittee Minutes (as applicable);

3. The prior authorization/referral/denial/appeal process for the following:
   a. Timeliness of UM and appeal decisions for non-urgent and urgent pre-certification, concurrent, and retrospective reviews;
   b. Professional review of clinical information;
   c. Clinical criteria for UM and appeal decisions;
   d. Medical information – relevant clinical information collected to support UM and appeal decision-making;
   e. Denial notices – clear documentation and communication of reasons for each denial and appeal decision, alternative treatment offered, and correct appeal language;
   f. Evidence of use of board-certified consultants for medical necessity decisions when applicable; and
   g. Evidence of current license for Providers and employees (RN and LVN) who make UM decisions.

4. Complex and Care Management (CM) files for demonstration of the CM process for:
   a. Case finding;
   b. Assessment and problem identification;
   c. Care Plans and attainable goals;
   d. Appropriateness of goals/time frames/monthly updates/follow ups;
   e. Implementation;
   f. Monitoring;
   g. Outcomes; and
   h. Recommended referral services.

5. Credentialing and re-credentialing files:
   a. All necessary primary source verifications have been performed within the required one hundred eighty (180) day timeframe;
   b. All required queries have been performed through appropriate verification sources;
   c. All credentialing and re-credentialing packets have been approved by the IPA’s Credentialing Committee;
25. DELEGATION AND OVERSIGHT

A. Delegation Oversight

2. Audit

d. All pertinent Quality Assurance (QA), grievance and Member information specific to a given Practitioner, as available, have been considered during the credentialing and re-credentialing process;

e. Processes are in place to ensure Provider documentation including licenses, Drug Enforcement Administration (DEA) certificate, Board Certification and malpractice insurance, are kept current;

f. Processes are in place to ensure documentation on subcontracted organizational Providers is verified at time of contracting and at least every three (3) years thereafter;

g. Re-credentialing of Practitioners was performed within required thirty-six (36)-month timeframe; and

h. There is sufficient documentation within each credentialing file to confirm that all primary source verifications, queries and other information reviewed pertinent to the credentialing or re-credentialing decision were received prior to and used in the credentialing and/or re-credentialing decision.

6. Randomly selected ancillary Provider files (i.e., Home Health, Durable Medical Equipment (DME), laboratory) to verify that Health Care Delivery Organizational Providers:

a. Confirms that the Provider is in good standing with state and federal regulatory bodies; to include review of Sanctions that would prevent the Provider from participation in the IEHP network.

b. Confirms that the Provider has been reviewed and approved by an accrediting body (e.g., The Joint Commission (TJC), Accreditation Association for Ambulatory Health Care (AAAHC)), as stated in Policy 25B7, “Assessment of Organizational Providers”;

c. Conducts an onsite quality assessment, if the Provider is not accredited. The onsite quality assessment will be conducted by IPA’s Quality Management Department. IPA’s assessment process and assessment criteria for each non-accredited Provider with which it contracts will include a process for ensuring that the Provider credentials its Providers, in accordance to NCQA guidelines. A CMS or state review may be used in lieu of a site visit and may not be greater than three (3) years old at the time of verification/approval.

d. Ensure that Medicare covered basic benefits are provided only by Providers that have signed participation agreements with CMS and suppliers approved by CMS as meeting conditions for coverage of their services.

e. Ensure that the Provider is not on the Medicare Opt-Out listing for service areas covered by IEHP (i.e. Northern and Southern California).
25. DELEGATION AND OVERSIGHT

A. Delegation Oversight

2. Audit

7. Compliance Training Verification:
   a. Training: General Compliance, FWA training for new hires and current employees (Temporary or Permanent), Providers, Contractors and Volunteers.
   b. Screening: Proof of Sanctions and Exclusions Screenings for all new hires and current employees (Temporary or Permanent), Providers, Contractors and Volunteers.

J. IEHP uses the IEHP Credentialing Delegation Oversight Audit (DOA) Tool, Compliance DOA Audit Tool, and the QM/UM/CM DOA Audit Tool which is based upon current NCQA, DHCS, CMS, and IEHP standards to sufficiently document information from the examined policies and procedures, committee minutes, files and other documents to NCQA and CMS specific standards, as well as to support the conclusions reached.

K. The IPA receives an exit interview with the IEHP auditors at the completion of the Delegation Oversight audit. This interview identifies areas found to be deficient giving the IPA an opportunity to provide additional information to clear the deficiency and highlighting opportunities for improvements that need to be addressed through the Corrective Action Plan (CAP) process.

L. Within thirty (30) days of the audit, the IPA receives written notification of the results. The written notification includes a cover letter and a completed audit tool noting any deficiencies found during the audit. The cover letter notes the timeframes for corrective action, and any other pertinent information.

M. Scoring categories for each of the Delegation Oversight Audit are as follows:
   1. Full Compliance 90-100%
   2. Partial Compliance 80-89%
   3. Non-compliance <79%

N. All IPAs that score 90% or greater pass that section of the audit. A CAP is required for all scores that fall below 90%. However, a CAP may be issued at the discretion of IEHP, regardless of the score, even if the score is 90% or above. In addition, any IPA that receives non-compliance in the credentialing portion of the audit is subject to further action up to termination of their IEHP contract. All CAPs submitted to IEHP must meet the requirements noted in Policy 25D3, “Quality Management - Corrective Action Plan Requirements.”

O. Focused audits may occur between annual audits in the following circumstances:
   1. Deficiencies noted as a result of the annual audit, as applicable;
   2. Review of documents submitted to IEHP indicates potentially significant changes to the IPA program; and
25. DELEGATION AND OVERSIGHT

A. Delegation Oversight
   2. Audit

3. Any other circumstance or quality issue identified that in the judgment of IEHP, requires a focused audit.

P. If the IPA is unable to meet the requirements at the second focused re-audit, IEHP may do one (1) of the following:
   1. Immediately freeze the IPA to new Member enrollment, as applicable;
   2. Send a thirty (30) day contract termination notice with specific cure requirements;
   3. Rescind delegated status of IPA, as applicable;
   4. Terminate the IEHP contract with the IPA; or
   5. Not renew the contract.

Q. IPAs who wish to appeal the results of the Delegation Oversight Audit must do so in writing within thirty (30) days of receiving their results to the IEHP Chief Medical Officer. IPA must cite reasons for their appeal, including disputed items or deficiencies.

R. IPA who consistently fail to meet IEHP standards, as confirmed through annual and/or focused audits or other oversight activities, are subject to actions up to and including rescission of delegated functions, non-renewal of the IEHP contract or termination of the IPA participation in the IEHP network.

REFERENCES:

A. California Health and Safety Code § 1367.27.
B. Senate Bill (SB) 137.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   1. Credentialing Policies

APPLIES TO:

A. This policy applies to all organizations delegated credentialing activities for IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid) line of business.

POLICY:

A. Delegates must have a well-defined credentialing and recredentialing process for evaluating and selecting licensed independent Practitioners to provide care to its Members.

B. Delegates’ policies and procedures describe a process for notifying Practitioners about their right to review information submitted to support their credentialing application.

C. Delegates’ policies and procedures describe how primary source information is received, dated and stored; how modified information is tracked and dated from its initial verification; the staff who are authorized to review, modify and delete information, and circumstances when modification or deletion is appropriate; the security controls in place to protect the information from unauthorized modification; and how the organization audits the processes and procedures.

D. Delegates’ recredentialing policies and procedures require information from quality improvement activities and Member complaints in the recredentialing decision making process.

E. Delegates’ policies and procedures must ensure that it only contracts with physicians who have not opted out.

F. Delegates must have policies and procedures that prohibit employment or contracting with Practitioners (or entities that employ or contract with such practitioners) that are excluded/sanctioned from participation (Practitioners or entities found on Office of Inspector General (OIG) Report).

G. Delegates must have policies and procedures that they do not contract with Practitioners who are precluded from receiving payment for Medicare Advantage (MA) items and services Part D drugs furnished or prescribed to Medicare beneficiaries.

PURPOSE:

A. IEHP promulgates credentialing and recredentialing decision guidelines for Practitioners directly contracted with IEHP and Practitioners credentialed and contracted by IEHP’s Delegates to perform these activities. IPAs are expected to use these guidelines for recommended education and/or training for PCPs and Specialists, patient age ranges for Practitioners, hospital arrangements, and recommendations for review of malpractice or other adverse history when making credentialing and recredentialing decisions.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   1. Credentialing Policies

B. IEHP and Delegates adhere to all procedural and reporting requirements under state and
   federal laws and regulations regarding the credentialing and recredentialing process, including
   the confidentiality of Practitioner information obtained during the credentialing process.

C. IEHP will use procedures consistent with Department of Health Care Services (DHCS) for all
   of Medi-Cal. DHCS can modify these rules at any time and is required to notify Centers for
   Medicare & Medicaid Services within ninety (90) days prior of any such change.

D. IEHP delegates all credentialing and recredentialing functions to Delegates that meet IEHP’s
   requirements for delegation of credentialing. The Delegate must demonstrate a rigorous
   process to select and evaluate Practitioners.

DEFINITION:

A. Verification Time Limit (VTL) - NCQA counts back from the decision date to the verification
   date to assess timeliness of verification.

B. Verbal Verification - Requires a dated, signed document naming the person at the primary
   source who verified the information, his/her title, the date and time of verification and include
   what was verified verbally.

C. Automated Verification - Requires there be a mechanism to identify the name of the entity
   verifying the information, the date of the verification, the source, and the report date, if
   applicable.

D. Written Verification - Requires a letter or documented review of cumulative reports. The
   Delegated IPA must use the latest cumulative report, as well as periodic updates released by
   the primary source. The date on which the report was queried, and the volume used must be
   noted.

E. Using the Internet for Primary Source Verification (PSV): PSV on documents that are
   printed/processed from an internet site (e.g. Breeze, National Practitioner Data Bank (NPDB)
   etc.), the data source date (as of date, release date) must be queried within the timeframe. The
   date of the query must be verified prior to the Credentialing Decision. If there is no data source
   date, the verifier must document the review date on the verification or the checklist.
   Verification must be from a National Committee for Quality Assurance (NCQA) approved
   and appropriate state-licensing agency.

F. PSV Documentation Methodology: The organization may use an electronic signature or
   unique electronic identifier of staff to document verifications (to replace the dating and
   initialing of each verification) if it can demonstrate that the electronic signature or unique
   identifier can only be entered by the signatory. The system must identify the individual
   verifying the information and the date of verification.

G. Delegate: If IEHP gives another organization (i.e. Credentials Verification Organization
   (CVO), Independent Practice Association (IPA), Specialty Network, etc.) the authority to
   perform certain functions on its behalf, this is considered delegation, e.g. Primary Source
   Verification of License, collection of the application, verification of board certification. The
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   1. Credentialing Policies

Delegated Entity is referred to as a Delegate.

1. Subdelegate: If the Delegate delegates certain functions on its behalf to another organization (i.e. CVO, MSO etc.), this is considered sub-delegation, and the organization would be considered a subdelegate. The Delegate will be responsible for sub-delegation oversight.
   a. Ongoing Monitoring or data collection and alert service are NOT seen as delegation.
   b. If information is gathered from a company website and the Delegate staff is pulling the queries for OIG or other types of queries, it is NOT considered delegation.

PROCEDURES:

A. Delegates’ policies and procedures must include the Practitioner Credentialing Guidelines that specify the following:

1. The types of Practitioners it credentials and recredentials. Credentialing requirements apply to:
   a. Practitioners who are licensed, certified or registered by the State of California to practice independently (without direction or supervision)
   b. Practitioners who have an independent relationship with the organization.
      1) An independent relationship exists when the organization directs its Member to see a specific practitioner or group of Practitioners, including all Practitioners whom Member can select as Primary Care Providers.
   c. Practitioners who provide care to Members under the organization’s medical benefits.
   d. The criteria listed above apply to Practitioners in the following settings:
      1) Individual or group practices
      2) Facilities
      3) Telemedicine
   e. IEHP credentials and recredentials the following types of Practitioners and describes which Providers IEHP and Delegates are required to credential or not credential:
      1) Doctor of Medicine (M.D.)
      2) Doctor of Osteopathic Medicine (D.O.)
      3) Doctor of Podiatric Medicine (D.P.M.)
      4) Doctor of Dental Surgery (D.D.S.) or Doctor of Dental Medicine (D.M.D.), who provide medical services only
      5) Occupational Therapists (O.T.)
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards

1. Credentialing Policies

6) Physical Therapy (P.T.)
7) Physician Assistants (P.A.) or Physician Assistants Certified (P.A.-C)
8) Certified Nurse Midwives (C.N.M.)
9) Nurse Practitioners (N.P.)
10) Speech Pathologists (S.P.)
11) Audiologists (Au.)
12) Registered Dieticians (R.D.) and Nutritionists
13) Chiropractors (D.C.)
14) Psychiatrists (M.D.)
15) Licensed Marriage and Family Therapists (L.M.F.T.)
16) Licensed Clinical Social Workers (L.C.S.W.)
17) Psychologists (Ph.D., Psy.D.)
18) Doctor of Chiropractic (D.C.)
19) IEHP does not require covering Practitioners and locum tenens that do not have an independent relationship with a Delegated IPA to be credentialed.
20) IEHP does not require Delegated IPAs to credential Practitioners that are hospital based and do not see Members on a referral basis.
21) IEHP does not require Delegated IPAs to contract with the following Provider types. Services rendered by these Practitioners are covered by IEHP, however, must utilize the network contracted by IEHP. Therefore, credentialing and recredentialing of these Providers will be completed by IEHP.
   ● Doctor of Chiropractic (D.C.)
   ● Licensed Acupuncturists (L.Ac.)
   ● Optometrists (O.D.)
   ● Other Behavioral healthcare Practitioners
     ○ Addiction Medicine Specialists
     ○ Master Level Clinical Nurses
     ○ Licensed Clinical Social Workers
     ○ Marriage Family Therapists

2. Delegates’ credentialing policies and procedures describe the sources the organization uses to verify credentialing information. The policy must describe the sources used to verify credentialing information of each of the following criterion listed below. All
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   1. Credentialing Policies

   verification sources must be included in policy to ensure compliance with IEHP.

   a. State license to Practice (Verification Time Limit (VTL): one hundred-eighty (180)
      calendar days prior to Credentialing decision date). Must be unencumbered, valid,
      current, and at the time of committee and remain valid and current throughout the
      Practitioner’s participation with IEHP. Failure to maintain a valid and current license
      at all times, will result in an administrative termination of the Practitioner.

      All Practitioners must be licensed by the State of California by the appropriate state
      licensing agency. The following license verifications must be obtained by the
      licensing board or their designated licensing and enforcement systems. The
      following licensures may be verified through BreEZe Online services online or
      directly with the licensing board via phone or mail:

      1) Medical Board of California (M.D.)
      2) Osteopathic Medical Board of California (D.O.)
      3) Board of Podiatric Medicine (D.P.M.)
      4) Board of Behavioral Sciences (L.M.F.T., L.C.S.W., M.F.C.C)
      5) Board of Psychology (Ph.D., Psy.D.)
      6) Dental Board of California (D.D.S., D.M.D.)
      7) California Board of Occupational Therapy (O.T.)
      8) California State Board of Optometry (O.D.)
      9) Physical Therapy Board of California (P.T.)
     10) Physician Assistant Committee (P.A., P.A.-C)
     11) California Board of Registered Nursing (C.N.M., N.P.)
     12) California Board of Chiropractic Examiners (D.C.)
     13) Speech-Language Pathology & Audiology Board (S.P., Au)
     14) Acupuncture Board (L.Ac.)

   b. Drug Enforcement Administration (DEA) or Controlled Dangerous Substances
      (CDS) certificate, if applicable (VTL: one hundred-eighty (180) calendar days prior
      to Credentialing decision date). All Practitioners who are qualified to write
      prescriptions, except non-prescribing Practitioners, must have a valid and current
      DEA certificate verified through one (1) of the following sources:

      1) A photocopy of the current DEA certificate, with date stamped and initialed by
         the reviewer to show receipt and review prior to the credentialing decision;
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   1. Credentialing Policies

2) A query of the National Technical Information Service (NTIS) database, with date stamped and initialed by the reviewer to show receipt and review prior to the credentialing decision.

3) IEHP may credential a Practitioner whose DEA certificate is pending or pending a DEA with a California address, by obtaining written documentation that the Practitioner with a valid DEA certificate will write all prescriptions requiring a DEA number for the prescribing Practitioner until the Practitioner has a valid DEA certificate.

4) If a Practitioner does not have a DEA or CDS certificate, the delegate must have a documented process to require an explanation why the Practitioner does not prescribe medications and to provide arrangements for the Practitioner’s patients who need prescriptions requiring DEA certification.

c. Education and Training (VTL: Prior to the Credentialing Decision) IEHP may use any of the following to verify education and training:

1) The primary source from the Medical School or through a clearinghouse.

2) The state licensing agency or specialty board if the state agency and specialty board, respectively, perform primary source verification. The organization obtains, at least annually, written confirmation of this fact, uses a printed, dated screenshot of the state licensing agency’s or specialty board’s website displaying the statement that it performs primary source verification of Practitioner education and training information or provides evidence of a state statute requiring licensing to obtain verification of education and training directly from the institution.

3) Sealed transcripts if the organization provides evidence that it inspected the contents of the envelope and confirmed that Practitioner completed (graduated from) the appropriate training program.

4) Below are acceptable sources for physicians (M.D., D.O.) to verify graduation from Medical School:
   - AMA Physician Master File.
   - Educational Commission for Foreign Medical Graduates (ECFMG) for international medical graduates licensed after 1986.

Below are acceptable sources for physicians (M.D., D.O.) to verify completion of residency training:
   - Primary source from the institution or clearinghouse where the postgraduate medical training was completed.
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   - AMA Physician Master File.
   - AOA Official Osteopathic Physician Profile Report or AOA Physician Master File.
   - FCVS for closed residency programs.
     - NCQA only recognizes residency programs accredited by the Accredited Council for Graduate Medical Education (ACGME) and the American Osteopathic Association (AOA) (in the United States) or by the College of Family Physicians of Canada (CFPC) or the Royal College of Physicians and Surgeons of Canada.
   
   d. Board Certification (VTL: one hundred-eighty (180) calendar days prior to Credentialing decision date). Below are the acceptable sources to verify board certification:

   1) For all Practitioner types
      - The primary source (appropriate specialty board).
      - The state licensing agency if the primary source verifies board certification.

   2) For Physicians (M.D., D.O.)
      - ABMS or its member boards, or an official ABMS Display Agency, where a dated certificate of primary-source authenticity has been provided.
      - AMA Physician Master File.
      - AOA Official Osteopathic Physician Profile Report or AOA Physician Master File.
      - Boards in the United States that are not members of the ABMS or AOA if the organization documents within its policies and procedures which specialties it accepts and obtains annual written confirmation from the boards that the boards performs primary source verification of completion of education and training.

   3) For other health care professionals
      - Registry that performs primary source verification of board that the registry performs primary source verification of board certification status.

   4) For Podiatrists (D.P.M.)
      - American Board of Foot and Ankle Surgery (formerly The American Board of Podiatric Surgery).
      - The American Board of Podiatric Medicine.
      - American Board of Multiple Specialties in Podiatry.
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5) For Nurse Practitioners (N.P.)
   - American Association of Nurse Practitioners (AANP).
   - American Nurses Credentialing Center (ANCC).
   - National Certification Corporation for the Obstetrics, Gynecology and Neonatal Nursing Specialties (NCC).
   - Pediatric Nursing Certification Board (PNCB).
   - American Association of Critical-Care Nurses (AACN).

6) For Physician Assistants (P.A.-C).
   - National Commission of Certification of P.A.’s (NCCPA).

7) For Certified Nurse Midwives (C.N.M.).
   - American Midwifery Certification Board (AMCB).

8) For Psychologists (Ph.D., Psy.D.).
   - American Board of Professional Psychology (ABPP).

e. Work history (VTL: one hundred-eighty (180) calendar days prior to Credentialing decision date) IEHP must obtain a minimum of the most recent five (5) years of work history as a health professional through the application, Curriculum Vitae (CV) or work history summary/attachment, providing it has adequate information.

f. Malpractice Claim History. A history of professional liability claims that resulted in settlement or judgment paid on behalf of the Practitioner. (VTL: one hundred-eighty (180) calendar days prior to Credentialing decision date). IEHP will obtain confirmation of the past five (5) years of malpractice settlements through one of the following sources:
   1) Malpractice Insurance Carrier
   2) National Practitioner Data Bank Query
   3) Evidence of Continuous Query (formerly Proactive Disclosure Services (PDS). Continuous Query must be reviewed within one hundred-eighty (180) calendar days of the initial credentialing decision. Evidence must be documented in the file or on checklist.

  g. Current Malpractice Insurance Coverage: IEHP requires that a copy of the insurance face sheet or Certificate of Insurance (COI) or written verification from the insurance carrier directly, be obtained in conjunction of collecting information on the application. (VTL: Must be evidence that the Practitioner has current and adequate malpractice coverage prior to the Credentialing Committee date and remain valid and current throughout the Practitioner’s participation with IEHP).
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   1) For Practitioners with federal tort coverage, the Practitioner must submit a copy of the federal tort letter or an attestation from the Practitioner of federal tort coverage.

   h. Hospital Admitting Privileges: IEHP must verify that Practitioners must have clinical privileges in good standing. Practitioner must indicate their current hospital affiliation or admitting privileges at a participating hospital. Verification that all clinical privileges are in good standing to perform functions for which the Practitioner is contracted, to include verification of admitting privileges, must be confirmed with the Hospital, in writing, via approved website or verbally.

   1) If a published Hospital directory is used, the list must include the necessary information and be accompanied by a dated letter from the Hospital attesting that the Practitioner is in “good standing.”

   2) If the Practitioner does not have clinical privileges, the IEHP must have a written statement delineating the inpatient coverage arrangement documented in the Provider’s file. (See Policy 5D, “Hospital Privileges”).

   3) Allied Health Professionals (Non-physicians i.e. Chiropractors, Optometrists) will not have hospital privileges and documentation in the file is not required for these types of Practitioners.

   4) Advanced Practice Practitioners (Physician Assistants (PA), Nurse Practitioners (NP), Nurse Midwives (NM)) may not have hospital privileges. However, if they provide the IEHP their hospital privileges, IEHP will be responsible for verifying if those privileges are active and ensure they are in good standing.

   5) Specialists (MDs, DOs and DPMs) may not have hospital privileges. Documentation must be noted in the file as to the reason for not having privileges. (e.g. A note stating that they do not admit as they only see patients in an outpatient setting is sufficient).

   i. State Sanctions and Restrictions on Licensure and Limitation on Scope of Practice. State sanctions, restrictions on licensure or limitations on scope of practice (VTL: one hundred-eighty (180) calendar days prior to Credentialing decision).

   1) Verification sources for sanctions or limitations on licensure include:
      - Chiropractors: State Board of Chiropractic Examiners CIN-BAD, NPDB.
      - Oral Surgeons: State Board of Dental Examiners, or State Medical Board, NPDB.
      - Physicians: Appropriate state board agencies, FSMB, NPDB.
      - Podiatrists: State Board of Podiatric Examiners, Federation of Podiatric Medical Boards, NPDB.
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   - Non-physician Healthcare Professionals: State licensure or certification board, appropriate state agency, NPDB.
   - For delegates using the Continuous Query (formerly Proactive Disclosure Service (PDS))
     - Evidence of current enrollment must be provided.
     - Report must be reviewed within one hundred eighty (180) calendar days of the initial credentialing decision.
     - Evidence of review must be documented in the file or on checklist.

j. Medicare/Medicaid Sanctions. Verification Sources for Medicare/Medicaid Sanctions:
   1) OIG must be the one (1) of the verification sources for Medicare sanctions, to ensure compliance with CMS.
      - Date of query and staff initials must be evident on a checklist or the OIG page must be in the file.
   2) The Medi-Cal Suspended and Ineligible list must be one (1) of the verification source for Medicaid sanctions, to ensure compliance with DHCS.
      - Date of query and staff initials must be evidence on a checklist, or the report page must be in the file.
   3) NPDB
   4) FSMB
   5) FEHB Program Department Record, published by the Office of Personnel Management, OIG.
   6) List of Excluded Individuals and Entities (maintained by OIG).
   7) Medicare Exclusions Database.
   8) State Medicaid Agency or intermediary and the Medicare intermediary.
   9) For delegate’s using the Continuous Query (formerly Proactive Disclosure Service (PDS))

k. NPI Number: Practitioners must hold and maintain a valid and active individual National Provider Identification Number (NPI) that can be verified through the National Plan & Provider Enumeration System (NPPES) website.
   1) Group NPI Numbers may be requested by IEHP, in addition to the mandatory individual NPI number.

3. Delegates’ policies require credentialing of Practitioners before they provide care to Members. IEHP does not allow provisional credentialing. Policies must define the criteria
required to reach a credentialing decision and must be designed to assess the Practitioner’s ability to deliver care. This criterion is used to determine which Practitioners may participate in its network, which may include, but are not limited to:

a. Provider must submit an application or reapplication that includes the following:
   1) Reasons for inability to perform the essential functions of the position;
   2) Lack of present illegal drug use;
   3) History of loss of license and felony convictions;
   4) History of loss or limitation of privileges or disciplinary actions;
   5) Current Malpractice Insurance coverage; and
   6) Current and signed attestation confirming the correctness and completeness of the application.

b. All Primary Care Physician (PCP) and Urgent Care Providers must meet the Facility Site Review (FSR)/Medical Record Review (MRR) Guidelines. See Policy MC06A, “Facility Site Review and Medical Records Review Survey Requirements and Monitoring.
   1) Providers at a site without an active participating PCP must still have an FSR/MRR completed and passed to be considered a Non-Par Provider in the network. No PCPs or Non-Par Providers will be able to provide services at sites without completing an FSR/MRR
   2) All PCPs must pass a required initial facility review performed by IEHP prior to receiving IEHP enrollment and treating Members.
      • IEHP has ninety (90) days from the submission of all required credentialing information to complete the facility site review.

c. Advanced Practice Practitioners are allowed to increase only one (1) supervising PCP’s enrollment capacity per location with a maximum of two (2) unique locations allowed. Advanced Practice Practitioners must be practicing at a site assigned to their supervising physician.

d. Practice within IEHP’s service area

e. Education and Training: Practitioners must be board certified in the specialty and/or subspecialty they are credentialed and contracted for, if applicable.
   1) If the Practitioner is not board certified in the subspecialty in which he/she is applying, there must be evidence of verification of residency and training in the subspecialty (e.g. Fellowship in Cardiology, Rheumatology, Pediatric Endocrinology, etc.), as relevant to the credentialed specialty, and meet the training requirements as set forth by ABMS or AOA.
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   • Practitioners who do not meet graduate medical training requirements as set forth by ABMS or AOA for the Provider’s requested subspecialty, will be subject to review by the IEHP Credentialing Subcommittee for review. Further review may be completed by the IEHP Peer Review Subcommittee.

   f. Effective January 1, 2017, IEHP Credentialing guidelines require Providers to meet the internship and residency requirements to be a Pediatric, Internal Medicine, Family Practice, or Public Health and General Preventive Medicine Provider in order to be credentialed as a Primary Care Provider in IEHP’s network.

      1) Existing Providers who do not meet this requirement are grandfathered into the network, however if the Provider chooses to terminate, the Provider may not reapply or be reinstated as a Primary Care Provider.

   g. IEHP specific specialty requirements: Medical Doctors (M.D.) and Doctor of Osteopathic (D.O.) must meet the education and training requirements set forth by the American Board of Medical Specialties (ABMS) or American Osteopathic Association (AOA) and additional criterion set by IEHP and noted below, if applicable. All IEHP specific specialty requirements are subject for review by the IEHP Medical Director or Chief Medical Officer. Further review may be completed by the Peer Review Subcommittee who will either approve or deny.

      IEHP will consider all relevant information including practice site demographics, Provider training, experience and practice capacity issues before granting any such change.

      1) Bariatric Surgery requirements effective January 1, 2019. Meet the education and training requirements for General Surgery; and one of the following criteria:

         • Completion of an accredited bariatric surgery fellowship;

         • Documentation of didactic training in bariatric surgery (IEHP recommends the American Society for Metabolic and Bariatric Surgery Course). This information will be verified through:

            o Bariatric training certificate and/or supporting letter from supervising bariatric surgeon, which will be verified by Credentialing. Supporting letter will include the minimum criteria:

               ▪ Supervising bariatric surgeon qualifications;

               ▪ Supervising bariatric surgeon relationship with applicant;

               ▪ Duration of relationship of supervising bariatric surgeon with applicant; and

               ▪ Assessment of applicant’s competency to perform bariatric surgery by supervising bariatric surgeon.
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   o Attestation of bariatric surgery case volume signed by applicant (See Attachment, “IEHP Bariatric Surgery Attestation” in Section 5) to include the following:

   ▪ Indicate volume of:
     □ proctored cases; and
     □ cases where applicant was the primary surgeon.
   ▪ IEHP requires a minimum of fifteen (15) cases where applicant was the primary surgeon.

   • Current or past “Regular or Senior Member” of American Society for Metabolic and Bariatric Surgery (ASMBS). Verification of membership will be obtained by the Credentialing Department.

   • IEHP recommends applicant actively participates with the MBSAQIP (Metabolic and Bariatric Surgery Accreditation and Quality Improvement Program) or an equivalent regional or national quality improvement program.

   o Supportive documentation of participation with program is to be submitted with Credentialing application.

2) Family Practice Providers with Obstetrics (OB) services, must meet the education and training requirements for Family Practice, set forth by ABMS or AOA and provide the following:

   • Family Practice 1: Family Practice that includes Outpatient OB services must:

     o Provide a copy of a signed agreement that states member transfers will take place within the first twenty-eight (28) weeks of gestation and a protocol for identifying and transferring high risk Members with a contracted and credentialed OB.

     o The OB must be within the same network as the Family Practice Provider and hold admitting privileges to the IEHP contracted hospital linked with that IPA network.

   • Family Practice 2: Family Practice that includes full OB services and delivery) must:

     o Have and maintain full delivery privileges at an IEHP contracted hospital.

     o Provide a written agreement for an available OB back up Provider is required.
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   ▪ The OB Provider must be credentialed, contracted and hold admitting privileges to the IEHP hospital linked with the Family Practice Provider; and
   ▪ Provide a protocol for identifying and transferring high risk members and stated types of deliveries performed (i.e. low-risk, cesarean section, etc).

3) Obstetrics/Gynecology (OB/GYN) Providers who would like to participate as a Primary Care Physician only, will provide outpatient well woman services only with no hospital or surgical privileges, must provide the following information for consideration:

   • Documentation of primary care practice in the United States;
   • Twenty-five (25) Continuing Medical Education (CME) units for most recent three (3) year period, of which must be in primary care related areas;
   • Applicants must provide two (2) letters of recommendation from a physician coworker (i.e. Primary Care Providers with work experience associated with the applicant in the preceding twenty-four (24) months); and
     o The physician coworkers must hold an active board certification in a Primary Care Specialty (i.e. board certified in Internal Medicine, Family Practice or Pediatrics).
   • In lieu of having full hospital delivery privileges, provide a written agreement with an OB Provider, that includes a protocol for identifying and transferring high risk Members, stated types of deliveries performed (i.e. low-risk, cesarean section etc), must be available for consultations, as needed and that the OB will provide prenatal care after twenty-eight (28) weeks gestation including delivery. (See Attachment, “Patient Transfer Agreement” in Section 5).
     o The Agreement must include back-up physician’s full delivery privileges at IEHP network hospital, in the same network as the non-admitting OB Provider.
     o The OB Provider must be credentialed and contracted within the same network.

   These OB/GYNs provide outpatient well woman services only with no hospital or surgical privileges. This exception must be reviewed and approved by IEHP Medical Director or Chief Medical Officer. Further review may be completed by the Peer Review Subcommittee who will either approve or deny.

4) Pediatric Providers may practice outside of scope (with expanding age ranges to
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      all ages) will be processed with a secondary specialty of General Practice, for
      review and approval by the IEHP Medical Director or Chief Medical Officer. Further
      review may be completed by the IEHP Peer Review Subcommittee who will either
      approve or deny. The following documents are required for consideration:

      • PCPs that have Member assigned ages 0-19 must enroll in the Vaccines for
        Children (VFC) Program.

      • Provide documentation of primary care practice in the United States for the
        past five (5) years which includes a mix of pediatric and adult patients. (See
        Attachment, “IEHP Addendum E” in Section 5);

      • Provide evidence of twenty-five (25) CME units in Adult Primary Care
        completed within the last three (3) years; and

      • Applicants must provide two (2) letters of recommendation from a
        physician coworker (i.e., Primary Care Providers with work experience
        associated with the applicant in the preceding twenty-four (24) months). The
        physician coworkers must hold an active board certification in Internal
        Medicine or Family Practice.

      5) General Preventive Medicine PCPs must complete the following, in addition to
         meeting the education requirements set by ABMS or AOA:

         • Twelve (12) month internship; and

         • Nine (9) months direct patient care experience (during or after residency);

      6) Specialties not recognized by either board (ABMS or AOA) are subject to
         Medical Director, Chief Medical Officer Review. Further review may be
         completed by the Credentialing Subcommittee or Peer Review Subcommittee,
         who will either approve or deny.

      7) Urgent Care Providers must:

         • Meet the education and training requirements set forth by ABMS or AOA
           for at least one (1) of the following Specialty boards:

           o American Board of Pediatrics

           o American Board of Family Practice

           o American Board of Internal Medicine

           o American Board of Obstetrics and Gynecology

           o American Board of Emergency Medicine

           o Osteopathic Board of Pediatrics
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- Osteopathic Board of Family Physicians
- Osteopathic Board of Internal Medicine
- Osteopathic Board of Obstetrics and Gynecology
- Osteopathic Board of Emergency Medicine

- If the Practitioner is board certified or eligible in a specialty and/or subspecialty recognized by the American Board of Medical Specialties or American Osteopathic Association not referenced above, then those Providers are subject to Medical Director, Chief Medical Officer Review. Further review may be completed by the Peer Review Subcommittee, who will either approve or deny. For their review and consideration, the following documents must be submitted:
  - Provide evidence of twenty-five (25) CME units in Pediatric Primary Care completed within the last three (3) years if the Provider is requesting to treat Pediatric patients;
  - Provide evidence of twenty-five (25) CME units in Adult Primary Care completed within the last three (3) years if the Provider is requesting to treat Adult patients; and
  - Applicants must provide two (2) letters of recommendation from a physician coworker (i.e., Primary Care Providers with work experience associated with the applicant in the preceding twenty-four (24) months). The physician coworkers must hold an active board certification in Pediatrics, Family Practice or Internal Medicine

h. Practice Parameter expansion(s) or reduction(s). Providers are required to submit a request that includes a detailed explanation when requesting a change in practice parameters such as an expansion or reduction in Member age range or specialty care privileges (i.e. addition of specialty). All Practice Parameter expansions and reductions are subject for review by the IEHP Medical Director or Chief Medical Officer. Further review may be completed by the Peer Review Subcommittee who will either approve or deny.

IEHP will consider all relevant information including practice site demographics, Provider training, experience and practice capacity issues before granting any such change. At a minimum, Provider’s written request must include:

1) Documentation of any relevant training (e.g., Continuing Medical Education, post graduate/residency training, etc.); and
2) Practical experience relating to the request (e.g., years in clinical practice, direct care experience with the relevant membership, etc.)
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   i. A current and valid, unencumbered license to practice medicine in California.

   j. Current and valid DEA registered in California

   k. NPI: Must confirm Provider has an active Individual NPI with a Primary address that must be registered to an address in California.
      1) Group NPI may be submitted to IEHP in conjunction to the Individual NPI.
      2) Telehealth Providers are not required to have an NPI registered with a primary address in California.

   l. Malpractice Insurance Coverage: Must have current and adequate malpractice insurance coverage that meets the following criteria:
      1) Minimum $1 million per claim/$3 million per aggregate.
      2) Coverage for the specialty the Provider is being credentialed and contracted for.
      3) Coverage for all locations the Provider will be treating IEHP patients.

   m. Appropriate admitting privileges or arrangements with IEHP’s contracted hospitals, if applicable. (See Policy 5B, “Hospital Privileges”).
      1) Urgent Care Providers are not required to maintain hospital admitting privileges if they are only practicing at an Urgent Care.

   n. Adverse History Guidelines: IEHP must carefully review the oversight process for the Delegates’ review of all Practitioners with evidence of adverse history are presented to Credentialing Committee for review and documented in the meeting minutes, that may include, but is not limited to Providers who have:
      1) Restrictions on licensure
      2) Restrictions on DEA
      3) Loss of Clinical privileges or negative privilege actions
      4) Not identified on any of the following Sanctions:
         • Medi-Cal Suspended & Ineligible List Providers are deemed suspended and ineligible from Medi-Cal will be terminated or not be credentialed and contracted with for Medi-Cal line of business. IEHP does not allow Medi-Cal Suspended & Ineligible List Providers to participate in the IEHP network.
         • Providers Excluded/Sanctioned by Medicare or Medicaid (OIG). IEHP prohibits employment or contracting with Practitioners (or entities that employ or contract with such Practitioners) that are excluded/sanctioned from participation (Practitioners found on OIG report). Providers identified on the OIG report, will not be credentialed or contacted, and terminated from our network if they are existing Providers.
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- Medicare Opt-Out Providers who are identified on the Medicare Opt-Out will not be contracted for Medicare line of business. IEHP does not allow Medicare Opt-Out Providers to participate in the IEHP network.
- Preclusions List, Providers identified on the preclusions list will be terminated or not be credentialed and contracted with.

5) Other negative actions may include, but are not limited to:
- Use of illegal drugs
- Criminal history
- Not engaged in any unprofessional conduct or unacceptable business practices.

6) Appropriate Malpractice History: For Practitioners with a history of malpractice suits or decisions, the following criteria warrants full Credentialing Subcommittee Review of the history and should be applied in making credentialing and recredentialing decisions:
- Number of claims - any claims within the prior seven (7) years.
- Results of cases - any settlements within the prior seven (7) years.
- Trends in cases - Practitioners with multiple malpractice claims in a similar area (e.g., missed diagnosis, negative surgical outcomes, etc.).

7) Grievance History
- Trend in grievances
- Higher than average grievance rate

o. Patient Age ranges

1) Patient age ranges for Primary Care Physicians (PCP) must be specifically delineated as part of the Delegated credentialing process. The age range for DualChoice Cal MediConnect Plan (Medicare – Medicaid) line of business are Ages 21 and above.

2) Guidelines for age ranges for non-physician Practitioners which include Nurse Practitioners (NPs), Physician Assistants (PAs), Certified Nurse Midwives (CNMs), Physical Therapists (PT), Occupational Therapists (OT), Speech-Language Therapists (S/LT), Opticians, Optometrists (OD), Chiropractors (DC), Dieticians and Nutritionists are as applicable to the training and certification of the non-physician Practitioner.

3) Patient age ranges for specialty physicians are specific to the specialty involved, training, and education of the physician.
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p. IEHP requires a completed Attachment I: Statement of Agreement by Supervising Provider, for all Advanced Practitioner and Supervising Physician arrangements, to ensure arrangements are documented appropriately, which will be collected at the time of credentialing, recredentialing and upon relationship change.

Delegates must ensure and obtain the appropriate documentation for all Advanced Practice Practitioners (i.e. Physician Assistants (PAs), Nurse Practitioners (NPs), and Certified Nurse Midwives (CNMs) between the Advanced Practice Practitioner and Supervising Physician are present at each site. Therefore, sites must ensure that these documents are available at the time of audit and are readily available upon request.

1) Physician Assistants are required to have a Practice Agreement or Delegation of Services Agreement and Supervising Physician Form. (See Attachment, “Delegation of Services Agreement and Supervising Physician Form” in Section 5), This agreement must define specific services identified in practice protocols or specifically authorized by the supervising physician., and
   - Both the physician and PA must attest to, date and sign the document;
   - PAs must be practicing at a site assigned to their supervising physician;
   - An original or copy must be readily accessible at all practice sites in which the PA works; and
   - The agreement must be reviewed, dated and signed annually; and provided to IEHP, upon request.

2) Nurse Practitioners and Nurse Midwives are required to have Standardized Procedures. Standardized Procedures must be on-site site specific and:
   - Reference textbooks and other written sources to meet the requirements of Title 16, CCR § 1474 (3), must include:
     o Book (specify edition) or article title, page numbers and sections.
   - NP and/or NM must be practicing at a site assigned to their supervising physician; and
   - Standardized Procedures must be signed by both the Advanced Practice Practitioner and the supervising physician, initially and annually; and provided to IEHP, upon request. At minimum, the Delegate must collect and submit to IEHP:
     o Table of Contents of the Standardized Procedures used, between the NP and/or CNM and supervising physician, that references the textbook or written sources to meet the requirements of the Board of Registered Nursing.
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- Evidence that the Standards of Care established by the sources were reviewed and authorized by the nurse Practitioner, physician and administrator in the practice setting (i.e. signature page that includes all parties involved)

- Standardized Procedures written using the Physician Assistants Delegation of Services Agreement and Supervising Physician Form format and/or verbiage is not accepted by IEHP.

4. Delegates’ policies must define the process used and the criteria required to reach credentialing decisions that are designed to assess the Practitioner’s ability to deliver care. At a minimum:

   a. The Credentialing Committee must receive and review the credentials of the Practitioners who do not meet the Delegates established criteria.

   b. Policy must identify what is considered acceptable to be determined as a clean file, if the Delegate utilized a clean file process.

   c. If retrospective review by IEHPs Credentialing Department reveals that a Practitioner approved by a Delegate does not meet the above requirements, IEHP can submit the Practitioner to IEHPs Peer Review Subcommittee for Review.

5. Delegates may designate to their Medical Director the authority to determine and sign off on a credentialing and recredentialing file that meets the Delegate standards as complete, clean, and approved. Delegates may assign an associate medical director or other qualified medical staff member as the designated medical director if the individual has equal qualifications as the medical director and is responsible for credentialing, as applicable. The Delegate’s Credentialing Committee must review the credentials of all Practitioners being credentialled or recredentialled who do not meet the Delegates established criteria, and to provide advice and expertise for credentialing decisions.

   a. If the Medical Director or equally qualified Practitioner signs off on clean files, the sign off date is the Committee date.

   b. If the Delegate decides not to use the Medical Director or equally qualified Practitioner, the Delegate can continue to send “clean files” to the Credentialing Committee.

6. Delegates’ policies must describe the process for requiring that credentialing and recredentialing are conducted in a nondiscriminatory manner.

   a. Policies must explicitly state that credentialing and recredentialing decisions are not based solely on an applicant’s race, ethnic/national identity, gender, age, sexual orientation or patient in which the Practitioner specializes and describe the steps for monitoring or preventing discriminatory practices during the credentialing/recredentialing processes.

   b. Delegates procedures for monitoring and preventing discriminatory credentialing
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   decisions may include but are not limited to:

   1) Periodic audits of Practitioner complaints to determine if there are complaints alleging discrimination;

   2) Maintaining and heterogeneous Credentialing Committee membership and requiring those responsible for credentialing decisions to sign an affirmative statement to make decisions in a non-discriminatory manner.

   3) Monitoring involves tracking and identifying discrimination in credentialing and recredentialing processes. Policy must indicate that monitoring is to be conducted at least annually. Examples of monitoring discriminatory practices:
      - Having a process for performing periodic audits of credentialing files (in-process, denied and approved files)
      - Having a process for performing annual audits of Practitioner complaints about possible discrimination. (Can be reviewed and discussed during quarterly or semi-annual review of complaints)

   4) Preventing involves taking proactive steps to protect against discrimination occurring in the credentialing and recredentialing processes. Examples for preventing discriminatory practices:
      - Maintaining a heterogeneous credentialing committee and requiring those responsible for credentialing decisions to sign a statement affirming that they do not discriminate.
      - Timeframe for prevention: None. Committee members can attest annually or at each meeting.

   7. Delegates’ policies and procedures must describe the process for notifying Practitioners when credentialing information obtained from other sources varies substantially from that provided. A statement that Practitioners are notified of discrepancies does not meet the requirement.

   8. Delegates’ policies and procedures must describe the process for notifying Practitioners the credentialing and recredentialing decisions within sixty (60) calendar days of the Committee’s decision.

   9. Delegates’ policies must describe the medical director or other designated Practitioner’s overall responsibility and participation in the credentialing process.

   10. Delegates’ policies and procedures must clearly state the information obtained in the credentialing process is confidential and describe the process to ensure confidentiality of the information collected during the credentialing process. The Delegates’ mechanisms in effect to ensure confidentiality of all information obtained in the credentialing process, except as otherwise provided by law, may include, but is not limited to:
      a. Confidentiality statements are signed by Committees and Credentialing staff
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   1. Credentialing Policies

b. Practitioner files are maintained in locked file cabinets are only accessible by authorized personnel; and

c. Security for database systems is maintained through passwords or other means to limit access to Practitioner information to authorized staff only.

11. Delegates’ policies and procedures describe the Delegates’ process for ensuring that information provided to IEHP for Member materials and Practitioner directories is consistent with the information obtained during the credentialing and recredentialing process. At minimum, policy should demonstrate that the information collected during the credentialing and recredentialing process and requests received in between cycles, is entered, maintained, and submitted to IEHP by the Credentialing Department to ensure consistency.

B. Delegates’ policies and procedures describe how the following three (3) factors are met and how the Practitioners are notified (e.g. application, contact, Provider manual, other information distributed to Practitioners, website, letter to Practitioners):

1. Review information submitted to support their credentialing application
   a. Policies should allow for review of information obtained from outside sources (e.g. malpractice insurance carriers, state licensing boards) to support their credentialing application. Delegates are not required to make available:
      1) References.
      2) Recommendations.
      3) Peer-Review protected information.

2. Delegate notifies Practitioners of their right to correct erroneous information (submitted by another source) and must clearly state:
   a. The time frame for making corrections.
   b. The format for submitting corrections.
   c. Where corrections must be submitted.

Delegates are not required to reveal the source of information that was not obtained to meet the verification requirements or if federal or state law prohibits disclosure.

Delegate must document receipt of corrected information in the Practitioners credentialing file.

3. Delegates notifies Practitioners of:
   a. Their right to be informed of the status of their application, upon request.
   b. The information it is allowed to share with Practitioners.
   c. Its process for responding to requests for application status.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   1. Credentialing Policies

C. Delegates credentialing process, both paper and electronic, must describe:
   1. How primary source verification information is received, dated and stored.
   2. How modified information is tracked and dated from its initial verification.
      a. The policy must clearly state how it tracks:
         1) When the information was modified
         2) How the information was modified
         3) Staff who made the modification
         4) Why the information was modified
   3. Staff who are authorized to review, modify and delete information, and circumstances when modification or deletion is appropriate.
      a. The delegates' policies and procedures identify the:
         1) Level of staff who are authorized to access, modify and delete information
         2) Circumstances when modification or deletion is appropriate
   4. The security controls in place to protect the information from unauthorized modification.
      a. Policies and procedures describe the process for:
         1) Limiting physical access to the credentialing information, to protect the accuracy of information gathered from primary sources and NCQA-approved sources.
         2) Preventing unauthorized access, changes to and release of credentialing information.
         3) Password-protecting electronic systems, including user requirements to:
            • Use strong passwords
            • Avoid writing down passwords
            • Use different passwords for different accounts
            • Change passwords periodically
            • Changing or withdrawing passwords, including alerting appropriate staff who oversee computer security to:
               o Change passwords when appropriate
               o Disable or remove passwords of employees who leave the organization
            • If the Delegate contracts with an external entity to outsource storage of credentialing information, the contract describes how the contracted entity ensures the security of the stored information.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   1. Credentialing Policies

   o Contract will require review if outsourcing

5. How the organization audits the processes and procedures in factors 1-4.
   a. The policies and procedures must describe the audit process for identifying and assessing risks and ensuring the specified policies and procedures are followed. The description includes:
      1) The audit methodology used, including sampling, the individuals involved in the audit and audit frequency.
      2) The oversight of the department responsible for the audit.

D. Delegates’ recredentialing policies and procedures require information from quality improvement activities and Member complaints in the recredentialing decision making process.

E. Delegates’ policies and procedures must ensure that it only contracts with physicians who have not opted out.
   1) Medicare Opt-Out Providers who are identified on the Medicare Opt-Out will not be contracted for Medicare line of business. IEHP does not allow Medicare Opt-Out Providers to participate in the IEHP network for Medicare lines of business.

F. Delegates must have policies and procedures that prohibits employment or contracting with Practitioners (or entities that employ or contract with such Practitioners) that are excluded/sanctioned from participation (Practitioners found on OIG report). Providers identified on the OIG report, will not be credentialed or contacted, and terminated from our network if they are existing Providers.

G. Delegates must have policies and procedures that they do not contract with Practitioners who are precluded from receiving payment for Medicare Advantage (MA) items and services Part D drugs furnished or prescribed to Medicare beneficiaries. IEHP does not allow Practitioners identified on the preclusions list to participate in the IEHP network.

REFERENCES:

A. NCQA, 2019 HP Standards and Guidelines, Credentialing and Recredentialing (CR) 1.
B. Medicare Managed Care Manual, Chapter 6 § 60.2, 60.3.
C. DHCS All Plan Letter (APL) 19-004 supersedes APL 17-019, “Provider Credentialing/Recredentialing and Screening/Enrollment”.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   1. Credentialing Policies
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   1. Credentialing Policies
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards

2. Credentialing Committee

APPLIES TO:

A. This policy applies to all organizations delegated credentialing activities for IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid) line of business.

POLICY:

A. Delegates Credentialing Committee must use participating Practitioners to provide expert advice and expertise for credentialing decisions.

B. Delegates Credentialing Committee must review credentials for Practitioners who do not meet established thresholds.

C. Delegates Credentialing Committee ensures files that meet established criteria are reviewed and approved by a medical director or designated Physician.

PURPOSE:

A. Delegate must designate a Credentialing Committee that uses a peer-review process to make recommendations regarding credentialing decisions.

B. Delegate obtains meaningful advice and expertise from participating Practitioners when it makes credentialing decisions.

C. Assessment of Timeliness - In accordance to National Committee for Quality Assurance (NCQA) guidelines, IEHP uses the Credentialing Committee or medical director decision date to assess timeliness in the file review elements if a review board or governing body reviews decisions made by the Credentialing Committee or Medical Director.

D. Providing care to Members - IEHP does not permit Practitioners to provide care to its Members before they are credentialed.

DEFINITION:

A. Delegate: If IEHP gives another organization (i.e. Credentials Verification Organization (CVO), Independent Practice Association (IPA), Specialty Network, etc.) the authority to perform certain functions on its behalf, this is considered delegation, e.g. Primary Source Verification of License, collection of the application, verification of board certification. The Delegated Entity is referred to as a Delegate.

1. Subdelegate: If the Delegate delegates certain functions on its behalf to another organization (i.e. CVO, Managed Service Organization (MSO) etc.), this is considered subdelegation, and the organization would be considered a Subdelegate. The Delegate will be responsible for subdelegation oversight.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards

2. Credentialing Committee

a. Ongoing Monitoring or data collection and alert service are NOT seen as delegation.

b. If information is gathered from a company website and the Delegate staff is pulling the queries for Office of Inspector General (OIG) or other types of queries, it is NOT considered delegation.

PROCEDURES:

A. Delegates Credentialing Committee must use participating Practitioners to provide expert advice and expertise for credentialing decisions.

1. The Credentialing Committee is a peer-review body with members from the range of Practitioners participating in the organizations network that makes recommendations regarding credentialing decisions. At a minimum, the policy and procedures must include:

   a. The Credentialing Committee:

      1) Composition of Committee is comprised of a range of participating Practitioners that includes multi-disciplinary representation with the ability to seek the advice of participating Practitioners outside of the Committee, at the Committee’s discretion, when applicable. If the Credentialing Committee is comprised of Primary Care Physicians’ (PCPs) only, the policy must state that Specialists are consulted, when necessary and appropriate. Evidence may include, but is not limited to:

         • Representation includes a range of participating Practitioners in the delegates network;
         • There is evidence through their Committee minutes that a Specialist was consulted, when applicable; and
         • There is a listing that indicates what Specialists were used (if applicable).

      2) Quorum requirements of Committee (minimum of three (3));

         • Meetings should include a quorum of Practitioners for each meeting.

      3) Identity of voting Members;

      4) Identity of who has authority to make final credentialing decisions and the relationship to the Governing Board (if applicable);

      5) Frequency of Committee meeting (at minimum, quarterly);

      6) Process to document, review and approve delegate credentialing policies and procedures by the Committee on an annual basis;
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   2. Credentialing Committee

   7) Committee’s opportunity to review documentation, criteria and credentials of all Practitioners being credentialed or recredentialed prior to rendering a recommendation; and

   8) All primary source information obtained and reviewed in the credentialing or recredentialing process must be no more than one hundred eighty (180) days old at the time of the Committee decision.

B. Delegates Credentialing Committee policies must describe how the Credentialing Committee receives and reviews the credentials of Practitioners who do not meet the Delegates established criteria. The Credentialing Committee must give thoughtful consideration of the credentialing information. Delegate must provide evidence of the following:

   1. The Credentialing Committee reviewed credentials for Practitioners who do not meet established thresholds;

   2. The Credentialing Committee’s discussion must be documented within its meeting minutes; and

   3. Credentialing Committee meetings and decision-making take place in the form of real-time virtual meetings (e.g. through video conferencing or WebEx conferment with audio).

   a. All meetings, including ad hoc, may not be conducted only through email.

   b. Meetings should include a quorum of practitioners for each meeting, as established in the Delegates policy.

   c. Minutes should be signed by the Credentialing Committee Chairperson and dated within one (1) month or by the date of the next meeting.

   d. Ad hoc Credentialing Committee meeting minutes must be documented at the time of the ad hoc meeting and must be presented at the next formal meeting.

C. Delegates must submit all Practitioner files to the Credentialing Committee for review or has a process for medical director or qualified Physician review and approve clean files.

   1. Delegates policy and procedures must state that the Credentialing Committee ensures the files that meet the established criteria are reviewed and approved by a Medical Director or designated Physician.

   a. Delegate may choose to continue to submit all Practitioner files to the Credentialing Committee for review, or it may implement a process for the Medical Director to review clean files, as described in the credentialing policies and procedures.

   1) If the Medical Director or designated Physician reviews the clean files, there must be evidence of the designated Medical Director’s or designated Physician’s review and approval in the Practitioners file or on a list of all Practitioners who meet the established criteria.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   2. Credentialing Committee

- Reports may include Credentialing Committee minutes or files, or a list of approved Practitioners signed or initialed by the Medical Director, for evidence that the requirement is met.

REFERENCE:

A. NCQA, 2019 HP Standards and Guidelines, Credentialing and Recredentialing (CR) 2.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   3. Credentialing Verifications

APPLIES TO:

A. This policy applies to all organizations delegated credentialing activities for IEHP Medicare DualChoice line of business.

POLICY:

A. Delegate verifies that the following are within the prescribed time limits: License to Practice, Drug Enforcement Administration (DEA), education and training, board certification, work history and malpractice history.

B. Delegate verifies the following sanction information for credentialing: State sanctions, restrictions on licensure or limitations on scope of practice, Medicare and Medicaid sanctions.

C. Delegate ensures applications for credentialing and recredentialing include reasons for inability to perform the essential functions of the position, lack of present illegal drug use, history of loss of license and felony convictions, history of loss or limitation of privileges or disciplinary actions, current malpractice insurance coverage, and a current and signed attestation confirm the correctness and completeness of the application.

D. Delegate verifies that Practitioners must have clinical privileges in good standing. Practitioner must indicate their current hospital affiliation or admitting privileges at a participating Hospital.

E. Delegate monitors its credentialing files to ensure that it only contracts with Practitioners who have not opted out.

F. Delegate includes information from the quality improvement activities and Member complaints in the recredentialing decision-making process.

G. Delegate confirms all Practitioners maintain an active individual National Provider Identifier (NPI) number registered through the Centers for Medicare and Medicaid Services (CMS) National Plan and Provider Enumeration System (NPPES).

H. Delegate ensures all Primary Care Provider’s (PCP) and Urgent Care’s (UC) are informed that they must pass an on-site site review conducted by IEHP. (See Policy 6A, “Site Review and Medical Record Review Survey Requirements and Monitoring”).

I. Delegates must provide IEHP with Social Security Numbers for all new and existing practitioners participating providers, to ensure all Practitioners are included in IEHP’s screening of the Death Master File.

J. Delegates monitors its Provider network and ensures their Providers are not included in the
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   3. Credentialing Verifications

   Centers Medicare & Medicaid Services (CMS) Preclusions List.

   K. Delegates must ensure all Practitioners are within the appropriate age range guidelines, as appropriate.

   L. Delegates must submit appropriate documentation to expand or limit their practice parameters for IEHP review and approval.

   M. Delegates must ensure and obtain the appropriate documentation for all Mid-Level Practitioners (i.e. Physician Assistants (PAs), Nurse Practitioners (NPs), and Nurse Midwives (NMs) between the Mid-Level and Supervising Physician, provide them to IEHP, and ensure these documents are readily available upon request. (See Policy 6F, “Non-Physician Practitioner Requirements”).

PURPOSE:

   A. IEHP must ensure Delegates conducts timely verification of information to ensure that Practitioners have the legal authority and relevant training and experience to provide quality care.

   B. Pencils are not an acceptable writing instrument for credentialing documentation.

DEFINITION: (if needed)

   A. Verification Time Limit (VTL): National Committee for Quality Assurance (NCQA) counts back from the decision date to the verification date to assess timeliness of verification.

   B. Each file contains evidence of verification, defined by NCQA as “Appropriate documentation.” IEHP documents verification in the credentialing files using any of the following methods or a combination:
      1. Credentialing documents signed (or initialed) and dated by the verifier.
      2. A checklist that includes for each verification:
         a. The source used.
         b. The date of verification.
         c. The signature or initials of the person who verified the information.
         d. The report date, if applicable.
      3. A checklist with a single signature and a date for all the verifications that has a statement confirming that the signatory verified all of the credentials on that date and that includes for each verification.
         a. The source used.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
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   b. The report date, if applicable.
   c. If the checklist does not include checklist requirements listed above appropriate credentialing information must be included.

C. Verbal Verification - Requires a dated, signed document naming the person at the primary source who verified the information, his/her title, the date and time of verification, and include what was verified verbally.

D. Automated Verification - Requires there be a mechanism to identify the name of the entity verifying the information, the date of the verification, the source, and the report date, if applicable.

E. Written Verification - Requires a letter or documented review of cumulative reports. The Independent Practice Association (IPA) must use the latest cumulative report, as well as periodic updates released by the primary source. The date on which the report was queried, and the volume used must be noted.

F. Using the Internet for Primary Source Verification (PSV): PSV on documents that are printed/processed from an internet site (e.g. BreEZe, National Practitioner Data Bank (NPDB), etc.), the data source date (as of date, release date) must be queried within the timeframe. The date of the query must be verified prior to the Credentialing Decision. If there is no data source date, the verifier must document the review date on the verification or the checklist. Verification must be from an NCQA approved and appropriate state-licensing agency.

G. PSV Documentation Methodology. The Delegate may use an electronic signature or unique electronic identifier of staff to document verifications (to replace the dating and initialing of each verification) if it can demonstrate that the electronic signature or unique identifier can only be entered by the signatory. The system must identify the individual verifying the information and the date of verification.

H. NPPES – CMS National Plan and Provider Enumeration System.

I. CMS Preclusions List – List of prescribers and individuals or entities who fall within any of the following categories:
   1. Currently revoked from Medicare:
   2. Under an active re-enrollment bar; or
   3. CMS has determined that the underlying conduct that led to the revocation is detrimental to the best interests of the Medicare program.

J. Death Master File (DMF) contains information about persons who had Social Security numbers and whose deaths were reported to the Social Security Administration from 1962 to the present; or persons who died before 1962, but whose Social Security accounts were still active in 1962.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   3. Credentialing Verifications

K. Delegate: If IEHP gives another Delegate (i.e. Credentials Verification Organization (CVO), Independent Practice Association (IPA), Specialty Network, etc.) the authority to perform certain functions on its behalf, this is considered delegation, e.g. Primary Source Verification of License, collection of the application, verification of board certification. The Delegated Entity is referred to as a Delegate.

   1. Subdelegate: If the Delegate delegates certain functions on its behalf to another organization (i.e. CVO, MSO etc.), this is considered subdelegation, and the organization would be considered a Subdelegate. The Delegate will be responsible for subdelegation oversight.
      a. Ongoing Monitoring or data collection and alert service are NOT seen as delegation.
      b. If information is gathered from a company website and the Delegate staff is pulling the queries for Office of Inspector General (OIG) or other types of queries, it is NOT considered delegation.

PROCEDURES:

A. The Delegate must verify that the following are within the prescribed time limits:

   1. A current and valid license to practice in California (Verification Time Limit (VTL): one hundred-eighty (180) calendar days prior to Credentialing decision date).
      a. Must be valid, current, and unencumbered at the time of committee and remain valid and current throughout the Practitioner’s participation with IEHP.
         1) For web queries, the data source data – e.g. release date or as of date is used to assess timeliness of verification.
         2) All Practitioners must be licensed by the State of California by the appropriate state licensing agency. The following license verifications must be obtained by the licensing board or their designated licensing and enforcement systems. The following licensures may be verified through BreEZe Online services online or directly with the licensing board via phone or mail:
            • Medical Board of California (M.D.)
            • Osteopathic Medical Board of California (D.O.)
            • Board of Podiatric Medicine (D.P.M.)
            • Board of Behavioral Sciences (L.M.F.T., L.C.S.W., M.F.C.C)
            • Board of Psychology (Ph.D., Psy.D.)
            • Dental Board of California (D.D.S., D.M.D.)
            • California Board of Occupational Therapy (O.T.)
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   - California State Board of Optometry (O.D.)
   - Physical Therapy Board of California (P.T.)
   - Physician Assistant Committee (P.A., P.A.-C)
   - California Board of Registered Nursing (C.N.M., N.P.)
   - California Board of Chiropractic Examiners (D.C.)
   - Speech-Language Pathology & Audiology Board (S.P., Au)
   - Acupuncture Board (L.Ac.)

   3) Failure to maintain a valid and current license at all times, will result in an administrative termination of the Practitioner.

   2. A valid DEA or Controlled Dangerous Substances (CDS) certificate, if applicable (VTL: one hundred-eighty (180) calendar days prior to Credentialing decision date). All Practitioners who are qualified to write prescriptions, except non-prescribing Practitioners, must have a valid and current DEA certificate.

      a. Must be valid and current at the time of committee and remain valid and current throughout the Practitioner’s participation with IEHP.

      b. Verification may be in the form of:

         1) A photocopy of the current DEA certificate, with date stamped and initialed by the reviewer to show receipt and review prior to the credentialing decision; or

         2) A query of the National Technical Information Service (NTIS) database, with date stamped and initialed by the reviewer to show receipt and review prior to the credentialing decision.

      c. Any Practitioner with a DEA with an “EXEMPT” Fee or status, the DEA is only valid at the exempting institution and any affiliate Hospital or Clinic rotations within the scope of training. The Delegate must confirm the Practitioner’s practice and exempting institutions relationship and document their findings in the Provider file, if the address on the DEA does not match the Providers practice location. If a Practitioner is practicing outside of the exempting institution and/or its affiliates, the Practitioner must obtain a “Paid” status DEA.

      d. The Delegate may credential a Practitioner whose DEA certificate is pending or pending a DEA with a California address, if the Delegate has a documented process for allowing a Practitioner with a valid DEA certificate to write all prescriptions requiring a DEA number for the prescribing Practitioner until the Practitioner has a valid DEA certificate.

      e. If a Practitioner does not have a DEA or CDS certificate, the Delegate must have a documented process to require an explanation why the Practitioner does not prescribe
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards

3. Credentialing Verifications

medications and to provide arrangements for the Practitioner’s patients who need prescriptions requiring DEA certification.

f. Failure to maintain an active DEA, may result in an administrative termination of the Practitioner.

3. Education and training (VTL: Prior to the Credentialing Decision) All Practitioners must have completed appropriate education and training for practice in the U.S. or a residency program recognized by NCQA, in the designated specialty or subspecialty they request to be credentialed and contracted. The Delegate verifies the highest of the following three (3) levels of education and training obtained by the Practitioner, as appropriate.

If the Practitioner is not board certified in the specialty or sub-specialty in which he/she is applying, there must be evidence of verification of residency and training in the sub-specialty (e.g. Fellowships in Cardiology, Rheumatology, Pediatric Endocrinology etc.), as relevant to the credentialed specialty.

The Delegate may use any of the following to verify education and training:

a. The primary source from the Medical School or through a clearinghouse.

b. The state licensing agency or specialty board if the state agency and specialty board, respectively, perform primary source verification. The Delegate obtains, at least annually, written confirmation of this fact, uses a printed, dated screenshot of the state licensing agency’s or specialty board’s website displaying the statement that it performs primary source verification of Practitioner education and training information or provides evidence of a state statute requiring licensing to obtain verification of education and training directly from the institution.

c. Sealed transcripts if the Delegate provides evidence that it inspected the contents of the envelope and confirmed that Practitioner completed (graduated from) the appropriate training program.

d. Below are acceptable sources for physicians (M.D., D.O.) to verify graduation from Medical School:

1) American Medical Association (AMA) Physician Master File.


3) Educational Commission for Foreign Medical Graduates (ECFMG) for international medical graduates licensed after 1986.

Below are acceptable sources for Physicians (M.D., D.O.) to verify completion of residency training:

1) Primary source from the institution or clearinghouse where the postgraduate medical training was completed.
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2) AMA Physician Master File.

3) AOA Official Osteopathic Physician Profile Report or AOA Physician Master File.

4) Federation Credentials Verification Service (FCVS) for closed residency programs.
   - NCQA only recognizes residency programs accredited by the Accredited Council for Graduate Medical Education (ACGME) and the American Osteopathic Association (AOA) (in the United States) or by the College of Family Physicians of Canada (CFPC) or the Royal College of Physicians and Surgeons of Canada.

4. Board certification status, if applicable (VTL: one hundred-eighty (180) calendar days prior to Credentialing decision date).

   a. The Delegate verifies current certification status of Practitioners who state that they are board certified.

      1) The Delegate must document the expiration date of the board certification within the credential file.
         - If a Practitioner has a “lifetime” certification status and there is no expiration date for certification, the Delegate verifies that the board certification is current and documents the date of verification.

      2) If board certification has expired it may be used as verification of education and training.

      3) Verification must be performed through a letter directly from the board or an online query of the appropriate board as long as the board states that they verify education and training with primary sources, is an acceptable source by NCQA, and indicate that this information is correct. Below are the acceptable sources to verify board certification:
         - For all Practitioner types
           o The primary source (appropriate specialty board).
           o The state licensing agency if the primary source verifies board certification.
         - For Physicians (M.D., D.O.)
           o American Board of Medical Specialties (ABMS) or its member boards, or an official ABMS Display Agency, where a dated certificate of primary-source authenticity has been provided.
           o AMA Physician Master File.
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- AOA Official Osteopathic Physician Profile Report or AOA Physician Master File.

- Boards in the United States that are not members of the ABMS or AOA if the Delegate documents within its policies and procedures which specialties it accepts and obtains annual written confirmation from the boards that the boards performs primary source verification of completion of education and training.

- For other health care professionals

  - Registry that performs primary source verification of board that the registry performs primary source verification of board certification status.

- For Podiatrists (D.P.M.)

  - American Board of Foot and Ankle Surgery (formerly The American Board of Podiatric Surgery).

  - The American Board of Podiatric Medicine.

  - American Board of Multiple Specialties in Podiatry.

- For Nurse Practitioners (N.P.)

  - American Association of Nurse Practitioners (AANP).

  - American Nurses Credentialing Center (ANCC).

  - National Certification Corporation for the Obstetrics, Gynecology and Neonatal Nursing Specialties (NCC).

  - Pediatric Nursing Certification Board (PNCB).

  - American Association of Critical-Care Nurses (AACN).

- For Physician Assistants (P.A.-C).

  - National Commission of Certification of P.A.’s (NCCPA).

- For Certified Nurse Midwives (C.N.M.)

  - American Midwifery Certification Board (AMCB).

- For Psychologists (Ph.D., Psy.D.)

  - American Board of Professional Psychology (ABPP).

5. Work history (VTL: one hundred-eighty (180) calendar days prior to Credentialing decision date) The Delegate must obtain a minimum of the most recent five (5) years of
work history as a health professional through the application, Curriculum Vitae (CV) or work history summary/attachment, providing it has adequate information.

a. The Delegate must document review of work history on the application, CV, or checklist that includes the signature or initials of staff who reviewed work history and the date of review. Documentation of work history must meet the following:

1) Must include the beginning and ending month and year for each work experience.

2) The month and year do not need to be provided if the Practitioner has had continuous employment at the same site for five (5) years or more. The year to year documentation at that site meets the intent.

3) If the Practitioner completed education and went to straight into practice, this will be counted as continuous work history.

4) If the Practitioner has practiced fewer than five (5) years from the date of credentialing. The work history starts at the time of initial licensure.

5) The Delegate must review for any gaps in work history. If a work history gap of six (6) months to one (1) year is identified, the Delegate must obtain an explanation from the Practitioner. Verification may be obtained verbally or in writing for gaps of six (6) months to one (1) year.

6) Any gap in work history that exceeds one (1) year must be clarified in writing from the Practitioner. The explanation of the gap needs to be sufficient to ascertain that the gap did not occur as a result of adverse and/or reportable situations, occurrences or activities.

6. A history of professional liability claims that resulted in settlement or judgment paid on behalf of the practitioner. (VTL: one hundred-eighty (180) calendar days prior to Credentialing decision date)

a. The Delegate must obtain confirmation of the past five (5) years of malpractice settlements through one of the following sources:

1) Malpractice Insurance Carrier

2) National Practitioner Data Bank Query

3) Evidence of Continuous Query (formerly Proactive Disclosure Services (PDS). Continuous Query must be reviewed within one hundred-eighty (180) calendar days of the initial credentialing decision. Evidence must be documented in the file or on checklist.

b. A minimum the five (5) years claim history must be reviewed for initial credentialing and all claim history activities after the previous credentialing decision date, will be reviewed for recredentialing.
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B. Credentialing Standards
   3. Credentialing Verifications

c. The five (5) year period may include residency and fellowship years. The Delegate is not required to obtain confirmation from the carrier for Practitioners who had a hospital insurance policy during a residency and fellowship.

B. Delegate verifies the following sanction information for credentialing:

1. State sanctions, restrictions on licensure or limitations on scope of practice (VTL: one hundred-eighty (180) calendar days prior to Credentialing decision).
   a. Verification sources for sanctions or limitations on licensure include:
      1) Chiropractors: State Board of Chiropractic Examiners, Chiropractic Information Network/Board Action Databank (CIN-BAD), or NPDB.
      2) Oral Surgeons: State Board of Dental Examiners, or State Medical Board, NPDB.
      3) Physicians: Appropriate state board agencies, Federation of State Medical Boards (FSMB), NPDB.
      4) Podiatrists: State Board of Podiatric Examiners, Federation of Podiatric Medical Boards, NPDB.
      5) Non-physician Healthcare Professionals: State licensure or certification board, appropriate state agency, NPDB.
      6) For Delegate’s using the Continuous Query (formerly Proactive Disclosure Service (PDS))
         • Evidence of current enrollment must be provided.
         • Report must be reviewed within one hundred eighty (180) calendar days of the initial credentialing decision.
         • Evidence of review must be documented in the file or on checklist.

2. Medicare and Medicaid sanctions. (VTL: one hundred-eighty (180) calendar days prior to Credentialing decision).
   a. Verification Sources for Medicare/Medicaid Sanctions:
      1) OIG must be one (1) of the verification sources for Medicare sanctions, to ensure compliance with CMS.
         • Date of query and staff initials must be evident on a checklist or the OIG page must be in the file.
      2) The Medi-Cal Suspended and Ineligible list must be one (1) of the verification source for Medicaid sanctions, to ensure compliance with Department of Health Care Services (DHCS).
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   - Date of query and staff initials must be evidence on a checklist, or the report page must be in the file.

   1) NPDB
   2) FSMB
   3) The Federal Employees Health Benefits (FEHB) Program Department Record, published by the Office of Personnel Management, OIG.
   4) List of Excluded Individuals and Entities (maintained by OIG).
   5) Medicare Exclusions Database.
   6) State Medicaid Agency or intermediary and the Medicare intermediary.
   7) For Delegate’s using the Continuous Query (formerly Proactive Disclosure Service (PDS))

C. Delegate applications for credentialing and recredentialing include the following:

   1. Reasons for inability to perform the essential functions of the position.
   2. Lack of present illegal drug use.
      a. Delegate’s application may use alternative language or general language that may not be exclusive to present use or only illegal stances.
   3. History of loss of license and felony convictions.
      a. At initial credentialing, the Practitioner must attest to any loss of license or felony convictions since their initial licensure.
      b. At recredentialing, the Practitioners may attest to any loss of licensure or felony convictions since their last credentialing cycle.
   4. History of loss or limitation of privileges or disciplinary actions.
      a. At initial credentialing, the Practitioner must attest to any loss or limitation of privileges since their initial licensure.
      b. At recredentialing, the Practitioners may attest to any loss or limitation of privileges since their last credentialing cycle.
   5. Current malpractice insurance coverage. IEHP requires that a copy of the insurance face sheet or Certificate of Insurance (COI) be obtained in conjunction of collecting information on the application.
      (VTL: Must be evidence that the Practitioner has current and adequate malpractice coverage prior to the Credentialing Committee date and remain valid and current throughout the Practitioner’s participation with IEHP).
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1) All Practitioners must have current and adequate malpractice insurance coverage that is current and:
   • Meets IEHP’s standard of $1 million/$3 million, as well as the IPAs standards. Professional Liability Insurance coverage and amounts of coverage must be verified with the insurance carrier or through the Practitioner via a copy of the policy and the signed attestation completed by the Practitioner. The copy of the Practitioner’s certificate must be initialed, and date stamped to show receipt prior to the credentialing decision and to show it was effective at the time of the credentialing decision.
   • Must include coverage for the specialty the Practitioner is being credentialed for and for all locations the Practitioner will be treating IEHP patients.
     o If the specialty coverage and/or the locations are not identified on the malpractice insurance certificate, the coverage must be verified with the insurance carrier and documented in the Practitioner’s file.
   • For Practitioners with federal tort coverage, the Practitioner must submit a copy of the federal tort letter or an attestation from the Practitioner of federal tort coverage.
   • There must be evidence that the Practitioner has current and adequate malpractice coverage prior to the Credentialing Committee approval date.
     o Failure to maintain current malpractice coverage for the specialty the Provider is being credentialed for and for all locations the Practitioner will be treating IEHP patients, will result in an administrative termination of the Practitioner.

6. Current and signed attestation confirm the correctness and completeness of the application. Attestation must be:
   a. Signed and dated within the timeframe and must include all elements to be compliant.
      1) The one hundred-eighty (180) calendar-day time frame is based on the date the Practitioner signed the application.
         • If the signature or attestation exceeds one hundred-eighty (180) calendar-days the Practitioner must only attest that the information on the application remains correct and complete, be re-signing and re-dating the attestation. Practitioner does not need to complete another application.

   b. Signed with a full signature, if the attestation needs to be re-signed by the Practitioner; dating and initialing is not acceptable.

   c. If the attestation is not signed and/or dated, within the appropriate time frame, all
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application elements are non-compliant (except current malpractice coverage since IEHP requires a face sheet is obtained).

1) If a question is answered incorrectly, Delegate is responsible for notifying the Practitioner to have them review the question.
   • If the Provider chooses to change their response, the Provider may initial and date next to the change.
   • If the Provider chooses not to change their response, the Delegate will document their attempt to have the Practitioner review their response and that the provider chose not to change their response.

d. When reviewing the Council for Affordable Quality Healthcare (CAQH) application, Delegate must review attestation questions in addition to the form that contains the generated date and the last updated (attestation date).

   1) If the generated date on the form is older than one hundred-eighty (180) calendar date, but there is a current attestation date, the Delegate may accept the application.

D. Delegate verifies that Practitioners must have clinical privileges in good standing. Practitioner must indicate their current Hospital affiliation or admitting privileges at a participating Hospital. Verification that all clinical privileges are in good standing to perform functions for which the Practitioner is contracted, to include verification of admitting privileges, must be:

1. Confirmed with the Hospital, in writing, via approved website or verbally, and must include:
   a. The date of appointment;
   b. Scope of privileges, restrictions (if any i.e. restricted, unrestricted) and recommendations.
   c. Confirmation Provider has admitting privileges in the specialty the Provider is credentialed and contracted for.
   d. If a published Hospital directory is used, the list must include the necessary information and be accompanied by a dated letter from the Hospital attesting that the Practitioner is in “good standing.”
   e. Practitioner must meet the requirements for Hospital Privileges as required by IEHP. (See Policy 5B, “Hospital Privileges”), i.e. if an admitter or hospitalist arrangement is used, a written agreement that meets IEHP admitter requirements, confirming coverage for all inpatient work covering the entire age range of the Practitioner must be included in the Practitioner’s credentialing file.
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1) These arrangements must be provided to IEHP for all Practitioners participating in the IEHP network, via Provider profile, admitter report or attachment.

2) If the Provider utilizes an admitter or hospitalist arrangement, the Delegate must document these arrangements in the Provider file, to include when the Provider was notified. Documentation must include:

   - The date the Practitioner was notified
   - Name(s) of the admitter and/or hospitalist, admitting on behalf of the Provider
   - Name(s) of the Hospital, affiliated with the inpatient coverage arrangements

2. If the Practitioner does not have clinical privileges, the Delegate must have a written statement delineating the inpatient coverage arrangement. (See Policy 5B, “Hospital Privileges”).

3. Allied Health Professionals (Non-physicians i.e. Chiropractors, Optometrists) will not have Hospital privileges and documentation in the file is not required for these types of Practitioners.

4. Mid-Level Practitioners (Physician Assistants (PA), Nurse Practitioners (NP), Nurse Midwives (NM)) may not have hospital privileges. However, if they provide the Delegate their Hospital privileges, Delegate will be responsible for verifying if those privileges are active and ensure they are in good standing.

5. Specialists (MDs, DOs and DPMs) may not have Hospital privileges, documentation must be noted in the file as to the reason for not having privileges. (e.g. A note stating that they do not admit as they only see patients in an outpatient setting is sufficient).

   a. These arrangements must be provided to IEHP for all Practitioners participating in the IEHP network, via Provider profile, admitter report or attachment.

      1) These arrangements are subject to IEHP review and approval.

      2) IEHP may request for inpatient coverage arrangements for the Practitioner, if IEHP identified that specialty as a specialty that requires Hospital admitting arrangements.

6. Certified Nurse Midwives (CNMs) may provide care of mothers and newborns through the maternity cycle of pregnancy, labor, birth and delivery services only after they are fully credentialed and approved by the IPA or IEHP directly. CNM Providers must meet the following criteria:

   a. In lieu of having full hospital delivery privileges, provide a written agreement with an Obstetrician (OB) Provider, that includes a protocol for identifying and transferring high risk Members, stated types of deliveries performed (i.e. low-risk, cesarean section etc.), must be available for consultations, as needed.
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1) The Agreement must include back-up Physician’s full delivery privileges at IEHP network Hospital, in the same network as the CNM Provider.

2) The OB Provider must be credentialed and contracted within the same practice and network.

7. Family Practice including outpatient Obstetrics (OB) services (FP-1) must provide a copy of a signed agreement that states:

   a. Member transfers will take place within the first twenty-eight (28) weeks of gestation and a protocol for identifying and transferring high risk members with a contracted and credentialed OB.

   1) The OB must be contracted and credentialed by the same network as the Family Practice Provider and must hold admitting privileges to the IEHP Hospital linked with that IPA network.

8. Family Practice including full Obstetrics services and delivery (FP-2). Providers that fulfill these requirements may be referred to and see Obstetrician/Gynecologist (OB/GYN) Members within the same IPA as the referring Physician, and must have:

   a. Full delivery privileges at an IEHP network Hospital; and

      1) Provide a written agreement for an available OB back up Provider is required. The OB Provider must be credentialed, contracted and hold admitting privileges to the IEHP Hospital linked with the Family Practice Provider; and

      2) Provide a protocol for identifying and transferring high risk Members and stated types of deliveries performed (i.e. low-risk, cesarean section, etc.).

9. Obstetrics/Gynecology (OB/GYN) Providers who would like to participate as a Primary Care Physician only, will provide outpatient well woman services only with no Hospital or surgical privileges, must provide the following information for consideration:

   a. In lieu of obtaining or maintaining full Hospital delivery privileges, the Practitioners must provide a written agreement with OB that includes:

      1) A protocol for identifying and transferring high risk Members, stated types of deliveries performed (i.e. low-risk, cesarean section etc.).

      2) Must be available for consultations, as needed and that the OB will provide prenatal care after twenty-eight (28) weeks gestation including delivery.

      3) The Agreement must include back-up Physician’s full delivery privileges at IEHP network Hospital, in the same network as the non-admitting OB Provider.

         • The OB Provider must be credentialed and contracted within the same network.
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10. Urgent Care Providers are not required to maintain Hospital privileges if they are exclusively practicing at an Urgent Care.

E. Delegate monitors its credentialing files to ensure that it only contracts with Practitioners who have not opted out. Delegate is responsible for:

1. Reviewing the information via hard copies, electronic or one (1) of the CMS.gov Opt-Out sites.
   a. Certain healthcare Providers categories cannot opt-out of Medicare. These include Chiropractors, physical therapists and occupational therapists in independent practice.

2. If Delegate employs their Practitioners, the initial credentialing and recredentialing review of employed Practitioners must include a review of the Medicare Opt-Out Report in all files credentialed.

3. The following are acceptable ways to verify review of the Opt-Out report:
   a. Checklist/Verification: Must have the following to be compliant:
      1) Staff initials/signature;
      2) Run date from CMS.gov Opt-Out Reports; and
      3) Indicate whether or not the practitioner is listed on the report.
   b. Pages of the CMS.gov listing report showing where the providers name would have been listed in alpha order. Must have the following to be compliant:
      1) Staff initials/signature;
      2) Run date from CMS.gov Opt-Out Reports; and
      3) Indicate whether or not the Practitioner is listed on the report.

F. Delegate includes information from the quality improvement activities and Member complaints in the recredentialing decision-making process. (Verification Time Limit: Last recredentialing cycle to present).

1. Quality activities include, but are not limited to:
   a. Adverse events
   b. Medical record review
   c. Data from Quality Improvement Activities
   d. Performance Information, may include but is not limited to:
      1) Utilization Management Data
      2) Enrollee satisfaction surveys
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3) Other activities of the Delegate
   e. Not all quality activities need to be present

2. Grievance/complaints

G. Delegate ensures all Practitioners hold and maintain a valid and active National Provider Identifier (NPI). Practitioners individual NPI number, and the information provided must be:

1. Verified through the NPPES website;
2. Active while in the IEHP network;
3. Current at all times (i.e. Primary Practice Address must be registered to an address within California).
   a. Telehealth Providers are not required to have an NPI registered to an address within California.
4. Practitioners that have a group NPI number may submit that information to IEHP, in addition to the mandatory individual NPI number.

H. Delegate ensures all Primary Care Provider’s (PCP) and Urgent Care’s (UC) are informed that they must pass an on-site site review conducted by IEHP. (See Policy 6A, “Site Review and Medical Record Review Survey Requirements and Monitoring”). All PCPs and UCs must pass an IEHP facility on-site review at the time of initial credentialing and every three (3) years thereafter, for Medi-Cal Programs.

1. Delegates are not delegated to perform on-site visits on behalf of IEHP; however, their policies and procedures must ensure they notify their Practitioners of IEHPs requirements and they remain compliant while they continue participation in IEHPs network. This would apply to, but not limited to:
   a. Prior to participating in the IEHP network as a Primary Care Physician or an Urgent Care provider; or
   b. When a Practitioner relocates.

I. Delegates must obtain and provide IEHP with Social Security Numbers for all new and existing Practitioners participating providers, to ensure all Practitioners are included in IEHP’s screening of the Social Security Administration’s Death Master File (SSADMF).

1. All Delegated IPA Provider submissions for participation in the IEHP network, the Delegate must include the Provider’s full Social Security Number (SSN).
   a. Submissions without SSN will be ceased and not processed by IEHP.
2. Delegated IPAs with existing Providers without SSNs will be notified. The Delegated IPAs are required to provide all missing SSNs to IEHP.
   a. Delegated IPAs who do not provide the requested information will be placed on a
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Corrective Action Plan (CAP), until all missing SSNs are submitted.

3. If a Practitioner confirms that his/her SSN is correctly stated on the Social Security Administration’s Death Master File (SSADMF), but is clearly not deceased, the Delegate must request for:
   a. A copy of the Social Security Card;
   b. A photo ID;
   c. A signed attestation from the Practitioner confirming they are who they say they are; and
   d. The Provider to contact the Social Security Administration’s Death Master File (SSADMF) to correct the issue.

4. If a Practitioners’ SSN is correctly stated but the name and Date of Birth (DOB) does not, the Delegate must request for:
   a. A copy of the Social Security Card;
   b. A photo ID;
   c. A signed attestation from the Practitioner confirming they are who they say they are; and
   d. The Provider to contact the Social Security Administration’s Death Master File (SSADMF) to correct the issue.

J. Delegates monitors its Provider network and ensures their Providers are not included in the Centers Medicare & Medicaid Services (CMS) Preclusions List (See Policy 25B5, “Ongoing Monitoring and Interventions”).

K. Delegates must ensure all Practitioners are within the appropriate age range guidelines, as appropriate. Medicare DualChoice Cal-MediConnect Member age ranges are ages 21 and above.

1. Specialists Member age ranges are specific to the specialty involved, training, and education of the Physician.

2. Non-Physician Practitioners which include Nurse Practitioners (NPs), Physician Assistants (PAs), Certified Nurse Midwives (CNMs), Physical Therapists (PT), Occupational Therapists (OT), Speech/Language Therapists (S/LT), Opticians, Optometrists (OD), Chiropractors (DC), Dieticians and Nutritionists are as applicable to the training and certification of the non-physician Practitioner.

L. Delegates must submit appropriate documentation to expand or limit their practice parameters for IEHP review and approval. Practitioners may practice outside of scope with approval from IEHP, by undergoing the Provide Privilege Adjustment process in this policy.
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1. Primary Care Physicians age range expansions.
   a. For PCP’s who have Pediatric age ranges assigned and would like to expand their age range to reflect all ages, will be processed with a secondary specialty of General Practice, must provide the following information for review and consideration:
      1) Provide documentation of primary care practice in the United States for the past five (5) years which includes a mix of pediatric and adult patients. (See Attachment, “IEHP Addendum E” in Section 5);
      2) Provide evidence of twenty-five (25) Continuing Medical Education (CME) units in Adult Primary Care completed within the last three (3) years;
      3) Applicants must provide two (2) letters of recommendation from a Physician coworker (i.e., Primary Care Providers with work experience associated with the applicant in the preceding twenty-four (24) months). The Physician coworkers must hold an active board certification in Internal Medicine or Family Practice;
      4) Malpractice coverage for the age range provider is requesting for that overs all locations the Provider will be treating IEHP Members; and
      5) Pass a Medical Record Chart Audit for Adult Members

2. Provider Privilege Adjustment. Practitioners who request a change in practice parameters (i.e. reduction of member age range, additional specialty) must submit a detailed explanation that includes the following, for review and consideration:
   a. Practice site demographics;
   b. Practical experience relating to the request (years in clinical practice, direct care experience with the relevant membership, etc.);
   c. Practice capacity; and
   d. Relevant training in the specialty, if applicable (e.g. Continuing Medical Education (CME), Post-graduate training, etc.)

M. Delegates must ensure and obtain the appropriate documentation for all Mid-Level Practitioners (i.e. Physician Assistants (PAs), Nurse Practitioners (NPs), and Nurse Midwives (NMs) between the Mid-Level and Supervising Physician, provide them to IEHP, and ensure these documents are readily available upon request. (See Policy 6F, “Non-Physician Practitioner Requirements”).

   1. Physician Assistants (PAs) may act as an agent of the supervising Physician in which they have an agreement (See Attachment, “Delegation of Services Agreement and Supervising Physician Form”, in Section 5). Physician Assistants and Supervising Physicians must have the following documents current, in place, and readily available on-
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site subject for review:

a. Delegation of Services Agreement and Supervising Physician Form (See Attachment, “Delegation of Services Agreement and Supervising Physician Form” in Section 5). This agreement must define specific services identified in practice protocols or specifically authorized by the supervising Physician.

1) Both the Physician and PA must attest to, date and sign the document;
2) PAs must be practicing at a site assigned to their supervising Physician;
3) An original or copy must be readily accessible at all practice sites in which the PA works; and
4) The agreement must be reviewed, dated and signed annually; and provided to IEHP, upon request.
   • The Delegation of Services Agreement authorizes a PA to provide or perform the following activities as long as there is documentation evidencing the activity was actually performed:
     o Physician examinations, including interscholastic athletic program examinations;
     o Order durable medical equipment (DME) and make arrangements with regard to home health services or personal care services, as applicable. For home health and/or personal care services, after consultation with the supervising Physician, the PA may approve, sign, modify or add to the plan of treatment of care.
     o Routine visual screenings, which includes non-invasive, non-pharmacological, simple testing for visual acuity, visual field defects, color blindness and depth perception.

b. Nurse Practitioners (NPs) and Nurse Midwives (NMs) may perform the following procedures if a standardized procedure is in place:

1) To diagnose mental and physical conditions, to use drugs in or upon human beings, to sever or penetrate the tissue of human beings and to use other methods in the treatment of diseases, injuries, deformities or other physical or mental conditions.
2) Standardized Procedures must be on-site site specific:
   • Reference textbooks and other written sources to meet the requirements of Title 16, CCR § 1474 (3), must include:
     o Book (specify edition) or article title, page numbers and sections.
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- NP and/or NM must be practicing at a site assigned to their supervising physician.
- Standardized Procedures must be signed by both the Practitioner and the supervising Physician, initially and annually; and provided to IEHP, upon request. At minimum, the Delegate must collect and submit to IEHP:
  - Table of Contents of the Standardized Procedures used, between the NP and/or CNM and supervising Physician, that references the textbook or written sources to meet the requirements of the Board of Registered Nursing.
  - Evidence that the Standards of Care established by the sources were reviewed and authorized by the nurse practitioner, Physician and administrator in the practice setting (i.e. signature page that includes all parties involved).
- Standardized Procedures written using the Physician Assistants Delegation of Services Agreement and Supervising Physician Form format and/or verbiage is not accepted by IEHP.
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B. Credentialing Standards
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REFERENCE:

A. NCQA, 2019 HP Standard and Guidelines, Credentialing and Recredentialing (CR) 3.
B. Medicare Managed Care Manual, Chapter 6 § 60.3
C. DHCS All Plan Letter (APL) 19-004 supersedes APL 17-019, “Provider Credentialing/Recredentialing and Screening/Enrollment”.
D. DMHC TAG – Quality Management 6/09/14
E. Title 42, California Code of Regulations § 438.602(b)
F. Title 16, California Code of Regulations (CCR) 1379, 1399.540, 1474
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B. Credentialing Standards
   4. Recredentialing Cycle Length

APPLIES TO:

A. This policy applies to all organizations delegated credentialing activities for IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid) line of business.

POLICY:

A. Delegates are responsible for formally recredentialing their contracted PCPs, non-physician Practitioners, specialists, and admitting physicians at least every thirty-six (36) months from their last credentialing decision date and submit specific updates to IEHP. (See Policy 25B10 “Credentialing Standards – Credentialing Quality Oversight of Delegates”)

PURPOSE:

A. Delegate conducts timely recredentialing.

DEFINITION:

A. Delegate: If IEHP gives another organization (i.e. Credentials Verification Organization (CVO), Independent Practice Association (IPA), Specialty Network, etc.) the authority to perform certain functions on its behalf, this is considered delegation, e.g. Primary Source Verification of License, collection of the application, verification of board certification. The Delegated Entity is referred to as a Delegate.

1. Subdelegate: If the Delegate delegates certain functions on its behalf to another organization (i.e. CVO, MSO etc.), this is considered subdelegation, and the organization would be considered a Subdelegate. The Delegate will be responsible for subdelegation oversight.
   a. Ongoing Monitoring or data collection and alert service are NOT seen as delegation.
   b. If information is gathered from a company website and the Delegate staff is pulling the queries for Office of Inspector General (OIG) or other types of queries, it is NOT considered delegation.

PROCEDURES:

A. The length of the recredentialing cycle is within the required thirty-six (36) month time frame.
   1. The thirty-six (36) month recredentialing cycle begins on the date of the previous credentialing decision. The thirty-six (36) month cycle is counted to the month, not to the day.

B. Delegates may extend a Practitioner’s recredentialing cycle time frame (beyond thirty-six (36) months) if the Practitioner is:
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4. Recredentialing Cycle Length

1. On active military assignment.
2. On medical leave (e.g., maternity leave).
3. On sabbatical.

Delegates must document this and recredential the Practitioner within sixty (60) calendar days of the Practitioner’s return to practice. Failure to meet the thirty-six (36) month time frame will result in the administrative termination of the Practitioner due to non-compliance to recredentialing.

C. If the Delegate terminates a Practitioner for administrative reasons (e.g. the Practitioner failed to provide complete credentialing information) and not for quality reasons, it may reinstate the Practitioner within thirty (30) calendar days of termination and is not required to perform initial credentialing.

1. The Delegate performs initial credentialing if reinstatement is more than thirty (30) days after termination.

REFERENCES:

A. NCQA, 2019 HP Standards and Guidelines, Credentialing and Recredentialing (CR) 4.
B. Medicare Managed Care Manual Chapter 6 – Relationships with Providers § 60.3
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B. Credentialing Standards
   5. Ongoing Monitoring and Interventions

APPLIES TO:

A. This policy applies to all organizations delegated credentialing activities for IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid) line of business.

POLICY:

A. Delegate must develop and implement policies and procedures for ongoing monitoring of Practitioner sanctions, complaints and quality issues between recredentialing cycles and takes appropriate action against Practitioners when it identifies occurrences of poor quality.

B. Delegate maintains a documented process for monitoring whether network physicians have opted out of participating in the Medicare Program.

C. Delegate will verify that their contracted Providers have not been terminated as Medi-Cal Providers or have not been placed on the Suspended and Ineligible Provider List.

D. Delegated maintains a documented process for monitoring whether its Practitioners are included in the Centers for Medicare & Medicaid Services (CMS) Preclusions List, to ensure compliance with the 2019 Medicare Program Final Rule.

E. Delegates that subscribe to a sanctions alert service must have a documented process and evidence for the screening and notification process.

F. Delegate is responsible for notifying IEHP of any findings and the actions decided by the Credentialing Committee regarding the Practitioners identified through the ongoing monitoring of sanctions, complaints, and quality issues between recredentialing cycles.

G. Delegate must have a process to verify and maintain Practitioner licensing status, DEA or CDS certificate, etc., and remedies if the license or certification expires or status changes during the Practitioner’s participation with IEHP regardless of its outside the recredentialing cycle.

H. IEHP expects all Delegates to continuously monitor Practitioner status and performance and to share their findings with IEHP.

PURPOSE:

A. Delegate identifies and, when appropriate, acts on important quality and safety issues in a timely manner during the interval between formal credentialing.

DEFINITIONS:
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B. Credentialing Standards

5. Ongoing Monitoring and Interventions

A. Adverse event – An injury that occurs while a Member is receiving healthcare service from a Practitioner.

B. Delegate: If IEHP gives another organization (i.e. Credentials Verification Organization (CVO), Independent Practice Association (IPA), Specialty Network, etc.) the authority to perform certain functions on its behalf, this is considered delegation, e.g. Primary Source Verification of License, collection of the application, verification of board certification. The Delegated Entity is referred to as a Delegate.

1. Subdelegate: If the Delegate delegates certain functions on its behalf to another organization (i.e. CVO, Management Service Organization (MSO) etc.), this is considered subdelegation, and the organization would be considered a subdelegate. The Delegate will be responsible for subdelegation oversight.

   a. Ongoing Monitoring or data collection and alert service are NOT seen as delegation.

   b. If information is gathered from a company website and the Delegate staff is pulling the queries for Office of Inspector General (OIG) or other types of queries, it is NOT considered delegation.

PROCEDURES:

A. Delegates include in their policy and procedures and provide evidence of ongoing monitoring and makes appropriate interventions by:

1. Delegate collects and reviews information from the following sources for Medicare and Medicaid sanctions.

   a. Delegates must use the List of Excluded Individuals and Entities (maintained by OIG) as the verification source for Medicare Sanctions, and review the report on a monthly basis, within thirty (30) days of its release.

      1) Delegate may develop a tracking log to include the report run date, review date, initials of person reviewing report, the list reviewed, and the web link used; or

      2) Delegate can print the entire list

         • The report must be dated and initialed

            o Practitioners identified on the Health & Human Services (HHS)-Office of Inspector General (OIG) Exclusions Report will be administratively terminated for all lines of business, without appeal rights due to IEHP prohibiting employment of contracting with Practitioners (or entities that employ or contract with such Practitioners) that are excluded/sanctioned from participation.

               ▪ Members will be reassigned to new Practitioners.
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B. Credentialing Standards

5. Ongoing Monitoring and Interventions

- The Provider will be presented to Peer Review Subcommittee as an administrative termination, for further review and discussion. Peer Review Subcommittee discussion will include Quality Management (QM) and Grievance Department findings to include any additional prior quality of care issues and Member complaints for the Provider.

2. Delegate collects and reviews information from any of the following sources for reviewing sanctions or limitations on licensure:

   a. Physicians. Sanction and limitation on licensure verifications must be verified through:

      1) BreEZe Online services online or directly with the licensing board via phone or mail:
         - Medical Board of California (M.D.)
         - Osteopathic Medical Board of California (D.O.)

      2) Federation of State Medical Boards (FSMB)

   b. Chiropractors. Sanction and limitation on licensure verifications must be verified through:

      1) BreEZe Online services online or directly with the licensing board via phone or mail:
         - California Board of Chiropractic Examiners (D.C.)

      2) Federation of Chiropractic Licensing Boards’ Chiropractic Information Network-Board Action Databank (CIN-BAD)

   c. Oral Surgeons. Sanction and limitation on licensure verifications must be verified through:

      1) BreEZe Online services online or directly with the licensing board via phone or mail:
         - Dental Board of California (D.D.S., D.M.D.)

      2) National Practitioner Data Bank (NPDB)

   d. Podiatrists. Sanction and limitation on licensure verifications must be verified through:

      1) BreEZe Online services online or directly with the licensing board via phone or
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   mail:
   • Board of Podiatric Medicine (D.P.M.)

2) Federation of Podiatric Medical Board (FPMB)
3) National Practitioner Data Bank (NPDB)

e. Nonphysician healthcare Practitioners. Sanction and limitation on licensure verifications must be verified through:
   1) BreEZe Online services online or directly with the licensing board via phone or mail:
      • Board of Behavioral Sciences (L.M.F.T., L.C.S.W., M.F.C.C)
      • Board of Psychology (Ph.D., Psy.D.)
      • California Board of Occupational Therapy (O.T.)
      • California State Board of Optometry (O.D.)
      • Physical Therapy Board of California (P.T.)
      • Physician Assistant Committee (P.A., P.A.-C)
      • California Board of Registered Nursing (C.N.M., N.P.)
      • Speech-Language Pathology & Audiology Board (S.P., Au)
      • Acupuncture Board (L.Ac.)
   2) National Practitioner Data Bank (NPDB)

3. Policies for collecting and reviewing complaints must state Delegate:
   a. Investigates Practitioner-specific Member complaints upon their receipt and evaluates the Practitioner’s history of complaints, if applicable.
   b. Evaluates the history of complaints for all Practitioner’s history of complaints at least every six (6) months.
   c. Quality or collecting and reviewing complaints are not delegated and complaints are forwarded to the Health Plans, as applicable.
   d. Policy and evidence may be found in the Quality Department.

4. Policies for collecting and reviewing information from identified adverse events Delegate must state:
   a. Monitoring for adverse events occurs every six (6) months.
   b. Quality/collecting and reviewing adverse events are not delegated and events are forwarded to the Health Plans, as applicable.
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c. Policy and evidence may be found in the Quality Department

5. Policies for implementing appropriate interventions when it identifies instances of poor quality related for factors 1-4 may be found in the Quality Department. Delegate must have a process to determine if there is evidence of poor quality that could affect the health and safety of its Members and implement the appropriate policy based on action/intervention.

   a. At minimum, Providers identified through ongoing monitoring for licensure actions, sanctions, adverse history, grievances and/or complaints, must be fully discussed and reviewed by the Credentialing Committee. The reason for review must be considered and documented in the meeting minutes.

      1) Interventions can be identified in one of the following:
         - Committee minutes
         - Practitioner files
         - Delegate file binders

   b. If IEHP believes that a Member’s health or safety may be at risk due to adverse events or quality concerns, IEHP may take one of the following actions:

      1) Refer the Practitioner to the next IEHP Peer Review Subcommittee meeting for direction;
      2) Immediately suspend the Practitioner from participation with IEHP with referral to the next IEHP Peer Review Subcommittee meeting; or
      3) Any other action as appropriate, given the circumstances and severity of the situation.

B. Delegates maintains a documented process for monitoring whether network physicians have opted out of participating in the Medicare Program using one of the CMS.gov Opt-Out sites.

   1. Delegate must review the Opt-Out Report from one of the CMS.gov sites on a quarterly basis, within thirty (30) days of its release.

      a. The report must be dated and initialed
      b. A checklist may be used to document the date of the electronic file download. The checklist must contain:
         1) The date of the download and signature of the Delegate personnel who verified it.
         2) Delegates must review quarterly Opt-Out reports even if they employ their Practitioners.

C. Delegates must use the Medi-Cal Suspended & Ineligible List, published monthly by the
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Department of Health Care Services (DHCS), as the verification source for Medicaid Sanctions. Delegate must review the Suspended & Ineligible List on a monthly basis, within thirty (30) days of its release.

1. Delegate may develop a tracking log to include the report run date, review date, initials of person reviewing report, the list reviewed, and the web link used;

2. Delegate may print the parts of the list that are applicable; or

3. Delegate can print the entire list
   a. The report must be dated and initialed
      1) Providers identified on the Medi-Cal Suspended and Ineligible List will be automatically suspended from participation in all Medi-Cal lines of business, without appeal rights.
         • All Members assigned to suspended Practitioners will be reassigned to new Practitioners.
         • The Suspended Practitioner will be presented to the Peer Review Subcommittee as an administrative termination and for further review, discussion.
            o Peer Review Subcommittee discussion will include Quality Management (QM) and Grievance Department findings to include any additional prior quality of care issues and Member complaints for the Provider.

D. Delegated maintains a documented process for monitoring whether its Practitioners are included in the Centers for Medicare & Medicaid Services (CMS) Preclusions List, to ensure compliance with the 2019 Medicare Program Final Rule. In order for Providers (including entities) to receive payment from Medicare Plan (Part C and D), they must not be included in the Centers for Medicare & Medicaid Services (CMS) Preclusions List.

1. On a monthly basis, IEHP will share updates of the Preclusions List on the Secure File Transfer Portal (SFTP), as it will be made available by CMS approximately every thirty (30) days, around the first (1st) business day of each month.
   a. Delegates are required to screen their Provider network against the Preclusions List monthly, within thirty (30) days of its release.
   b. Notify IEHP within two (2) business days if an exact match is found for:
      1) National Practitioner Identification (NPI)
      2) Employer Identification Number (EIN), specific to entities

E. Delegates that subscribe to a sanctions alert service must have evidence of its subscription to the sanctions alert service during the look back period.
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1. Delegates using the Continuous Query:
   a. The Continuous Query generates individual alerts from NCQA-recognized sources reporting an action. Delegate must:
      1) Provide evidence of the Practitioners’ continuous enrollment in the Continuous Query
      2) Have a process for reviewing sanction alerts within thirty (30) days of their release.
      3) Show evidence of the annual enrollment listing of Providers enrolled and review of alerts within thirty (30) calendar days of its release.
      4) If no reports were received for ongoing monitoring, Delegate must document or note that no reports were received during the monthly look-back period.
      5) Documentation can be kept electronically or via electronic or paper log/checklist.
         • A spreadsheet/tracking log may be used as documentation for compliance. Delegate must include:
            o Name of board/entity
            o Date of query
            o Date of report
            o Signature/initialed of Delegate personnel who reviewed it.
   b. Delegates using an outside company or sanctions alert service (i.e. OIG Compliance Now, Streamline Verify) for ongoing monitoring or data collection and alert services, must:
      1) Have evidence of its subscription to the sanctions alert service during the look back period.
      2) Provide a documented process and evidence that includes, but is not limited to:
         • How the list of Providers is compiled and provided to the company for screening
         • List of sanctions screened by outside company, (can be found in an attachment or contract with entity)
         • How the Outside company notifies Delegate of their findings
         • Screening is reviewed within thirty (30) calendar days of their release
         • If no reports were received for ongoing monitoring, Delegate must document or note that no reports were received during the monthly look-
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   back period.

   • Documentation can be kept electronically or via electronic or paper log/checklist.
      o A spreadsheet/tracking log may be used as documentation for compliance. Delegate must include:
         ▪ Name of board/entity
         ▪ Date of query
         ▪ Date of report
         ▪ Signature(s)/initials of Delegate personnel who reviewed it.

   c. If the reporting entity does not publish sanction information on a set schedule, the delegates:
      1) Documents that the reporting entity does not release information on a set schedule.
      2) Queries for this information for at least six (6) months.

   d. If the reporting entity does not release sanction information reports, the delegate must conduct individual queries of credentialed Practitioners every twelve (12) to eighteen (18) months.

   e. Delegates that subscribe to a sanctions alert service reviews the information within thirty (30) calendar days of a new alert. The delegate must:
      1) Show evidence of its subscription to the sanctions alert service during the look-back period and reviews the information within thirty (30) calendar days of a new release.

F. IEHP notifies Delegates of any adverse actions it becomes aware of through sources other than the Delegate. In addition, IEHP shares with all Delegates the results of performing monitoring through quality improvement studies, Member complaints and Member satisfaction surveys, as applicable. IEHP reviews the history of each Delegate’s credentialed and approved Practitioners. Delegate is responsible for notifying IEHP of:

1. Any findings and the actions decided by the Credentialing Committee within thirty (30) days of the decision, to include, but not limited to:
   a. Date(s) of the Credentialing Committee the Practitioner was reviewed;
   b. Date of the Credentialing Committee decision;
   c. Delegate’s Plan of action for the Practitioner;
   d. Frequency of monitoring (if applicable); and
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e. Any follow-ups scheduled

1) All Practitioners identified through the ongoing monitoring will be presented to IEHP’s Peer Review Subcommittee for review and decision.
   - IEHP reserves the right to approve, deny, terminate or otherwise limit Practitioner participation in the IEHP network for any reason including up to quality issues.
     - If a Provider is denied participation due to quality of care and an 805 was filed with the appropriate licensing agency and the National Practitioner Data Bank (NPDB) than the Provider is not eligible to reapply.
       - For administrative terminations or denials, he/she may reapply after one (1) year.
     - Practitioners can appeal adverse decisions by the IEHP Peer Review Subcommittee as delineated in IEHP’s Peer Review Process and Level I Review and Level II Appeal (See Attachments, “IEHP Peer Review Process and Level I Review” and “IEHP Peer Review Process and Level II Appeal” in Section 5).

2. Any of the following occurs with one of their contracted Practitioners:
   a. The surrendering, revocation or suspension of a license;
   b. The surrendering, revocation or suspension of DEA registration;
   c. A change in hospital staff status or hospital clinical privileges, including any restrictions or limitations;
   d. A change in hospital admitting arrangements for Practitioners without IEHP affiliated hospital privileges;
   e. Loss of malpractice insurance; and
   f. The notification must include the IPA’s proposed action and/or resolution.

3. Delegates are required to notify IEHP in writing within thirty (30) days of its knowledge, if any of the following occurs with one of their contracted Practitioners:
   a. Any filing pursuant to Business and Professions Code Sections § 805, 805.01 or 809;
   b. Any filing with the NPDB; and
   c. The notification must include the Delegate’s proposed action and/or resolution.

G. Delegate must have a process to verify and maintain Practitioner licensing status, DEA or
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   CDS certificate, etc., and remedies if the license or certification expires or status changes during the Practitioner’s participation with IEHP.

   1.  Delegate is responsible for notifying IEHP of any licensure and DEA changes within thirty (30) days of the change. The notification must include:
       a.  Date the Delegate was notified;
       b.  Type of change;
       c.  Effective date of the change;
       d.  Date of Credentialing Committee review, (if applicable);
       e.  Delegate’s Plan of Action for the Practitioner;
       f.  Frequency of monitoring (if applicable); and
       g.  Any follow-ups scheduled.

       REFERENCE:
       A.  NCQA, 2019 HP Standards and Guidelines, Credentialing (CR) 5.
       B.  Medicare Managed Care Manual, Chapter 6 § 60.3.
       C.  DHCS All Plan Letter (APL) 19-004 supersedes APL 17-019, “Provider Credentialing/Recredentialing and Screening/Enrollment”.

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INLAND EMPIRE HEALTH PLAN

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25. DELEGATION OVERSIGHT

B. Credentialing Standards
   6. Notification to Authorities and Practitioner Appeal Rights

APPLIES TO:

A. This policy applies to all organizations delegated credentialing activities for IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid) lines of business.

POLICY:

A. Delegates policies and procedures must state how the organization reviews participation of Practitioners whose conduct could adversely affect Members’ health or welfare, specify the range of actions that may be taken to improve Practitioner performance before termination, how the Delegate reports its actions to the appropriate authorities and makes the appeal process known to Practitioners.

B. Delegates policies and procedures regarding suspension or termination of a participating Physician require the Delegate to ensure that the majority of the hearing panel members are peers of the affected Physician.

PURPOSE:

A. A Delegate that has taken action against a Practitioner for quality reasons reports the action to the appropriate authorities and offers the Practitioner a formal appeal process.

B. Delegates must use objective evidence and patient-care considerations when deciding on a course of action for dealing with a Practitioner who does not meet its quality standards.

C. If a Delegate terminates or suspends a Practitioner for quality reasons, it must report to the appropriate authorities, including state licensing agencies, the National Practitioner Data Bank (NPDB), and Inland Empire Health Plan (IEHP).

D. Notification applies to Physicians and nonphysicians for suspensions and terminations for quality reasons.

E. Delegates must provide evidence that it followed its appeal process if it altered the conditions of a Practitioner’s participation based on quality of care or service reasons.

F. Practitioners must appeal directly to their contracted IPA for adverse credentialing decisions rendered by the Delegated IPA.

G. Reporting to appropriate authorities is not applicable in the following circumstances:
   1. If there are no instances of suspension, termination, restriction or revocation to report for quality reasons.
   2. For automatic administrative terminations based on the Practitioners not meeting specific contractual obligations for participation in the network.
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H. All credentialing records and proceeds are confidential and protected to the fullest extent allowed by Section 1157 of the California Evidence Code, and any other applicable law.

DEFINITION:

A. “Peer” is an appropriately trained and licensed Physician in a practice similar to that of the affected Physician.

B. “Licentiate” means a Physician and surgeon, doctor of podiatric medicine, clinical psychologist, marriage family therapist, clinical social worker, professional clinical counselor, dentist, licensed midwife, or physician’s assistant. Licentiate also includes a person authorized to practice medicine pursuant to California Code, Business and Professions Code Section 2113 or 2168.

C. “Agency” meets the relevant state licensing agency having regulatory jurisdiction over the licentiates.

1. The Medical Board of California is the agency for the following Practitioner types:
   a. Physicians and Surgeons (MDs)
   b. Doctors of Podiatric Medicine (DPMs)
   c. Licensed Midwives (LMs)
   d. Physician Assistants (PAs)

D. “Staff privileges” means any arrangements under which a licentiate is allowed to practice in or provide care for patients in a health facility. Those arrangements shall include, but are not limited to, full staff privileges, active staff privileges, limited staff privileges, auxiliary staff privileges, provisional staff privileges, temporary staff privileges, courtesy staff privileges, locum tenens arrangements, and contractual arrangements to provide professional services, including, but not limited to, arrangements to provide outpatient services.

E. “Denial or termination of staff privileges, membership, or employment” includes failure or refusal to renew a contract or to renew, extend or reestablish any staff privileges, if the action is based on medical disciplinary cause or reason.

F. “Medical disciplinary cause or reason” means that aspect of a licentiate’s competence or professional conduct that is reasonably likely to be detrimental to the patient’s safety or to the delivery of patient care.

G. Delegate: If IEHP gives another organization (i.e. Credentials Verification Organization (CVO), Independent Practice Association (IPA), Specialty Network, etc.) the authority to perform certain functions on its behalf, this is considered delegation, e.g. Primary Source Verification of License, collection of the application, verification of board certification. The Delegated Entity is referred to as a Delegate.
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1. Subdelegate: If the Delegate delegates certain functions on its behalf to another organization (i.e. CVO, MSO etc.), this is considered subdelegation, and the organization would be considered a Subdelegate. The Delegate will be responsible for subdelegation oversight.
   a. Ongoing Monitoring or data collection and alert service are NOT seen as delegation.
   b. If information is gathered from a company website and the Delegate staff is pulling the queries for Office of Inspector General (OIG) or other types of queries, it is NOT considered delegation.

PROCEDURES:

A. Delegates policies must specify the Delegate reviews participation of Practitioners whose conduct could adversely affect Members’ health or welfare. Delegates policy must include:

1. The range of actions available to the Delegate, that they may take to improve the Practitioner performance before termination, to include, but not limited to:
   a. Profiling
   b. Corrective actions(s)
   c. Monitoring
   d. Medical Record Audit
2. The Delegates policies and procedures must give the Practitioners the right to appeal and must include the following steps within the appeal process:
   a. Provide written notification when a professional review action has been brought against a Practitioner, including reasons for the action.
   b. Allow Practitioners to request a hearing/appeal and the timing for submitting the request.
   c. Policy must state that the Delegate cannot have an attorney, if the Practitioner does not have attorney representation, to ensure compliance with CA Business & Professions Code 809.3(c).
3. Practitioner Appeal Process where the Delegate informs the affected Practitioner of its appeal process and includes the following information in process and notification.
   a. Providing written notification indicating that:
      1) A professional review action has been brought against the Practitioner;
      2) Reasons for the action; and
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3) A summary of the appeal rights and process, which can be made known to the Practitioner through an attachment, addendum, policy, contract or manual.

b. Allowing the Practitioner to request a hearing and the specific time period for submitting the request.

c. Allowing at least thirty (30) days after the notification for the Practitioner to request a hearing.

d. Allowing the Practitioner to be represented by an attorney or another person of the Practitioner’s choice.

e. Appointing a hearing officer or a panel of individuals to review the appeal.

f. Providing written notification of the appeal decision that contains specific reasons for the decision.

4. Delegates must have policies and procedures that describe when and how reporting occurs, to whom incidents are reported and what specific incidents are reportable. The policy must address what is expected of the Delegates staff and outline accountability so that staff understand their responsibilities in order to perform their functions correctly. When the Delegate decides to suspend or terminate a Practitioner’s contract, there must be procedures notifying the appropriate authorities (including state agencies, as appropriate) of the action, that includes, but is not limited to:

a. 805 Reports.

1) Delegate is not required to file a separate report with respect to action attributable to the same medical disciplinary cause or reason.

   • If the Medical Board of California or a licensing agency of another state revokes or suspends, without a stay, the license of a Physician and surgeon, a peer review body is not required to file an 805 report when it takes an action as a result of the revocation or suspension.

   • If the California Board of Podiatric Medicine or a licensing agency of another state revokes or suspends, without a stay, the license of a doctor of podiatric medicine, a peer review body is not required to file an 805 report when it takes an action as a result of the revocation or suspension

2) If an 805 is reported, it shall include the following information:

   • The name of the licentiate involved;
   • The license number of the licentiate involved;
   • A description of the facts and circumstances of the medical disciplinary cause or reason; and
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- Any other relevant information deemed appropriate by the reporter.

3) Delegates must file an 805 report with the relevant agency within fifteen (15) days after the effective date on which any of the following occur as a result of an action of a peer review body:

- A licentiate’s application for staff privileges or membership is denied or rejected for medical disciplinary cause or reason.
- A licentiate’s membership, staff privileges, or employment is terminated or revoked for a medical disciplinary cause or reason.
- Restrictions are imposed, or voluntarily accepted, on staff privileges, membership, or employment for a cumulative total of thirty (30) days or more for any twelve (12) month period, for a medical disciplinary cause or reason.

4) If a licentiate takes any action listed above, after receiving notice of a pending investigation initiated for a medical disciplinary cause or reason or after receiving notice that his or her application for membership or staff privileges is denied or will be denied for a medical disciplinary cause or reason, the chief of a staff or a medical or professional staff or other chief executive officer, medical director, or administrator of any peer review body and the chief executive officer or administrator of any licensed health care facility or clinic where the licentiate is employed or has staff privileges or membership or where the licentiate applied for staff privileges or membership, or sought the renewal thereof, shall file an 805 report with the relevant agency within fifteen (15) days after the licentiate takes the action.

- Resigns or takes a leave of absence from membership, staff privileges or employment.
- Withdraws or abandons his or her application for staff privileges or membership.
- Withdraws or abandons his or her request for renewal of staff privileges or membership.

b. 805.01 Reports

1) Delegate must file an 805.01 within fifteen (15) days after a peer review body makes a final decision or recommendation of termination, suspension or restriction of staff privileges, membership or employment due to an investigation, for at least one (1) of the following reasons:

- Incompetence, or gross or repeated deviation from the standard of care
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- Involving death or serious bodily injury to one (1) or more patients in such manner as to be dangerous or injurious to any person or the public.
- The use of, or prescribing for or administering to him/herself, any controlled substance; or the use of any dangerous drug, as defined in Section 4022, or of alcoholic beverages, to the extent or in such a manner as to be dangerous or injurious to the licentiate, or any other persons, or the public, or to the extent that such use impairs the ability of the licentiate to practice safely.
- Repeated acts of clearly excessive prescribing, furnishing or administering of controlled substances or repeated acts of prescribing, dispensing, or furnishing of controlled substances without a good faith effort prior examination of the patient and medical reason therefor.
- Sexual misconduct with one (1) or more patients during a course of treatment or an examination.

c. **National Practitioner Data Bank (NPDB)**
   1) Reports must be submitted to the NPDB within thirty (30) days of the action.

d. **Health Plan Reporting**
   1) Reports must be submitted to IEHPS Credentialing Manager, within thirty (30) days of the action.

B. Delegates policies and procedures regarding suspension or termination of a participating physician require the Delegate to ensure that the majority of the hearing panel members are peers of the affected Physician.

1. A Peer is an appropriately trained and licensed Physician in a practice similar to that of the affected Physician.
2. Panel members do not have to possess identical specialty training.
3. Policies and procedures do not always have to state the word “majority”, but at least 51% of the members must be peers.

**REFERENCES:**

A. NCQA, 2019 HP Standards and Guidelines, Credentialing and Recredentialing (CR) 6.
B. California Code, Business and Professions Code § 809.3(c).
C. Medicare Managed Care Manual, Chapter 6 § 60.4.
D. California Evidence Code § 1157.
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6. Notification to Authorities and Practitioner Appeal Rights

E. California Code, Business and Professions Code § 805, 805.01.
F. California Code, Business and Professions Code § 2113 or 2168.
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B. Credentialing Standards

7. Assessment of Organizational Providers

APPLIES TO:

A. This policy applies to all organizations delegated credentialing activities for IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid) lines of business.

B. Delegates who contract with Organizational Providers to provide medical services to Members as designated in the IEHP Division of Financial Responsibility (DOFR) Matrix.

POLICY:

A. Delegate has written policies and procedures for the initial and ongoing assessment of Providers with which it contracts. IEHP delegates to IPAs that meet IEHP delegation requirements for credentialing, the responsibility for the initial and on-going assessment of subcontracted Providers that render services to Members and the delegate is responsible for claims payment for those Health Care Delivery Organization Providers. IEHP retains oversight responsibilities for all subcontracted Providers.

B. Delegates are required to verify the accreditation status, license, certification and standing with regulatory bodies of all subcontracted organizational Providers (as applicable), in compliance with the most current National Committee for Quality Assurance (NCQA) standards and IEHP requirements. Subcontracted organizational Providers include but are not limited to hospitals, home health agencies, laboratories, skilled nursing facilities, and freestanding surgical centers, including family planning facilities and alternative birth centers. Subcontracted mental health and substance abuse Providers include inpatient, residential, and ambulatory settings are carved out.

C. IEHP is responsible for the initial and ongoing assessment for behavioral healthcare facilities, providing mental health or substance abuse services in inpatient, residential, and ambulatory settings.

D. Delegates must assess contracted medical health care Providers, organizational Providers, against the requirements and within the time frame.

E. IEHP is responsible for the assessment of contracted Behavioral Healthcare Providers against the requirements and within time frame.

F. If during the contract period, the Delegate becomes aware of a change in the accreditation and/or Centers for Medicare and Medicaid Services (CMS) Site Survey, license, certification status, sanctions, fraudulent activity or other legal or remedial actions have been taken against any Provider, the Delegate must notify IEHP’s Compliance Department.

PURPOSE:

A. Delegate evaluates the quality of organizational Providers with which it contracts.

B. IEHP directly contracts with IPAs and Hospitals (Providers). In turn, Providers subcontract...
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B. Credentialing Standards

7. Assessment of Organizational Providers

with Health Care Delivery Organizational Providers (subcontracted Providers) to provide services to Members as designated in the Division of Financial Responsibility (DOFR) Matrix outlined in IEHP’s Capitated Agreements with the Hospitals and IPAs. Subcontracted Providers include, but are not limited to, Hospitals, Home Health Agencies, Skilled Nursing Facilities, Free-Standing Surgical Centers, Behavioral Health Providers (Intensive Outpatient Programs and Residential Treatment Programs), Hospice, Clinical Laboratories, Comprehensive Outpatient Rehabilitation Facilities, Outpatient Physical Therapy Providers, Outpatient Speech Pathology Providers, Providers of End-stage Renal Disease Services (Dialysis), Outpatient Diabetics Self-Management Training providers, Portable X-Ray Supplier, Rural Health Clinics, and Federally Qualified Health Centers.

C. All Providers must adhere to all procedural and reporting requirements under state and federal laws and comply with the most recent NCQA, state and regulatory guidelines for subcontracted organizational Providers, as well as IEHP requirements.

D. Delegated Providers that subcontract with Ancillary and organizational Providers are responsible for ensuring that their subcontracted Providers meet IEHP’s requirements as stated herein and in Policy 05A7, “Credentialing Standards - Assessment of Organizational Providers”, IEHP audits Delegate’s compliance with IEHP requirements on an annual basis, using the IEHP Delegation Oversight Audit Tool beginning with a pre-contractual assessment, in accordance with Policy 25A1, “Delegation Oversight - Delegated Activities.” Delegated IPAs are subject to corrective action as defined in Policy 25D3, “Quality Management - Corrective Action Plan Requirements.”

E. IEHP reserves the right to perform facility site audits when quality of care issues arise and to deny contracted or subcontracted Providers participation in the IEHP network if IEHP requirements for participation are not met.

F. Contracted and/or subcontracted Provider’s failure to meet IEHP’s requirements may result in adverse action up to and including non-renewal or termination of the delegated entity contract or IEHP contract.

DEFINITION:

A. Delegate: If IEHP gives another organization (i.e. Credentials Verification Organization (CVO), Independent Practice Association (IPA), Specialty Network, etc.) the authority to perform certain functions on its behalf, this is considered delegation, e.g. Primary Source Verification of License, collection of the application, verification of board certification. The Delegated Entity is referred to as a Delegate.

1. Sub-delegate: If the Delegate delegates certain functions on its behalf to another organization (i.e. CVO, MSO etc.), this is considered sub-delegation, and the organization would be considered a Sub-delegate. The Delegate will be responsible for sub-delegation oversight.
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a. Ongoing monitoring or data collection and alert service are NOT seen as delegation.

b. If information is gathered from a company website and the Delegate staff is pulling the queries for Office of Inspector General (OIG) or other types of queries, it is NOT considered delegation.

PROCEDURES:

A. Delegates’ policies for assessing a health care delivery provider specifies that before it contracts with a Provider, and at least every thirty-six (36) months thereafter, it:

1. Must specify sources used to confirm that Providers are in good standing with state and federal requirements, that include, but are not limited to:

a. State (Department of Health Care Services) regulatory body

   1) A copy of the license and expiration date;

      • A current and unencumbered license; must also be appropriately licensed and no other negative license actions that may impact participation

   2) Physician-owned clinics are not required to be licensed by DHCS, but they must be accredited by an agency approved by the Medical Board. (If the physician-owned clinic is appropriately accredited, they would be compliant with the Knox-Keene Act of Title 28);

   3) If a state license is not issued by the Department of Health Care Services, the facility should have a business license or certificate of occupancy.

   4) Licensure must be maintained throughout the duration of the subcontractors’ participation in the IEHP network.

b. Federal Regulatory Bodies

   1) Review of OIG or Medicare/Medicaid Sanctions must be completed and documented on the spreadsheet or the file.

      • The monthly review of the OIG report as part of the “Ongoing Monitoring” qualifies as compliant for this section if the facilities are included on the OIG Report.

      ° IEHP prohibits employment or contracting with Practitioners (or entities that employ or contract with such Practitioners) that are excluded/sanctioned from participation (Practitioners or entities found on OIG Reports). A Provider is considered excluded, sanctioned, or ineligible, if the Provider is named by the appropriate State or Federal departments or agencies on exclusionary lists, including but not limited to the following: The Department of Health & Human Services
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(DHHS), Office of Inspector General (OIG), List of Excluded Individuals and Entities List (LEIE), General Services Administration (GSA), Excluded Parties Lists System (EPLS), California Department of Health Care Services (DHCS), Medi-Cal Suspended and Ineligible List, and California Department of Public Health (CDPH) Medi-Cal certification as applicable. IEHP reserves the right to terminate the contract for cause, with appropriate notice as defined in the IEHP Agreement.

2) Must have no sanctions that may impact participation

3) Centers for Medicare and Medicaid Services (CMS) signed participating agreement letter, if applicable.

4) An attestation from a Provider to the organization regarding the Provider's regulatory status is not acceptable.

c. The Organizational Providers must maintain accreditation and license status in good standing and/or current at all times during their participation in the IEHP network.

1) The Organization Provider is responsible for providing the Delegate, with copies of its renewed license and accreditation within sixty (60) days following the expiration of the license and accreditation.

2. IEHP accepts an accreditation report or a letter from the regulatory and accrediting bodies regarding the status of the Provider, as evidence that the Provider has been reviewed and approved by an accrediting body.

Accreditation and licensure must be maintained throughout the duration of the subcontractors’ participation in the IEHP network.

a. The following are acceptable accrediting bodies by IEHP:

1) Accreditation Association for Ambulatory Health Care (AAAHC)

2) Accreditation Commission for Health Care Inc (ACHC)

3) American Association for Accreditation for Ambulatory Surgical Facilities (AAAASF)

4) American Association of Diabetes educators (AADE)

5) Clinical Laboratory Association Improvement (CLIA) Certificate or CLIA Waiver

6) College of American Pathology (CAP)

7) Commission for the Accreditation of Birth Centers (CABC)

8) Commission on Accreditation or Rehabilitation Facilities (CARF)
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9) Commission on Office Laboratory Accreditation (COLA)
10) Continuing Care Accreditation Commission (CCAC)
11) Center for Improvement in Healthcare Quality (CIHQ)
12) Council on Accreditation (COA)
13) Community Health Accreditation Program (CHAP)
14) Det Norske Veritas National Integrated Accreditation of Healthcare Organization (DNVNIAHO)
15) Federal Drug Administration (FDA) Certification
16) Healthcare Facilities Accreditation Program (HFAP) As of October 2015, the Healthcare Facilities Accreditation Program (HFAP) is no longer owned by the AOA, it is now managed by the Accredited Association for Ambulatory Health Care, Inc. (AAAHC)
17) Indian Health Service (IHS)
18) The Institute for Medical Quality’s (IMQ’s) (CMS approved accrediting body verified by IEHP)
19) The Joint Commission (TJC)
20) An attestation from a provider to the organization regarding the providers regulatory status is not acceptable.

b. IEHP recognizes the following accreditations by Organizational Provider type:

1) Hospitals
   - The Joint Commission (TJC)
   - Healthcare Facilities Accreditation Program (HFAP) As of October 2015, the Healthcare Facilities Accreditation Program (HFAP) is no longer owned by the American Osteopathic Association (AOA), it is now managed by the Accredited Association for Ambulatory Health Care, Inc. (AAAHC)
   - Det Norske Veritas National Integrated Accreditation of Healthcare Organization (DNVNIAHO)
   - Center for Improvement in Healthcare Quality (CIHQ)

2) Home Health Agencies
   - The Joint Commission (TJC)
   - Community Health Accreditation Program (CHAP)
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- Accreditation Commission for Health Care Inc (ACHC)

3) Skilled Nursing Facilities
- The Joint Commission (TJC)
- Commission on Accreditation or Rehabilitation Facilities (CARF)
- Continuing Care Accreditation Commission (CCAC)

4) Free-Standing Surgical Centers
- The Joint Commission (TJC)
- American Association for Accreditation for Ambulatory Surgical Facilities (AAAASF)
- Accreditation Association for Ambulatory Health Care (AAAHC)
- Healthcare Facilities Accreditation Program (HFAP) As of October 2015, the Healthcare Facilities Accreditation Program (HFAP) is no longer owned by the AOA, it is now managed by the Accredited Association for Ambulatory Health Care, Inc. (AAAHC)
- The Institute for Medical Quality’s (IMQ’s) (CMS approved accrediting body verified by IEHP)

5) Behavioral Health Providers (Intensive Programs and Inpatient Treatment Programs)
- The Joint Commission (TJC)
- Commission on Accreditation or Rehabilitation Facilities (CARF)
- Healthcare Facilities Accreditation Program (HFAP)
- Council on Accreditation (COA)

6) Hospice
- The Joint Commission (TJC)
- Community Health Accreditation Program (CHAP)
- Accreditation Commission for Healthcare INC (ACHC) (CMS approved accrediting body verified by IEHP)

7) Clinical Laboratories
- The Joint Commission (TJC)
- Clinical Laboratory Association Improvement (CLIA) Certificate or CLIA Waiver
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   • Commission on Office Laboratory Accreditation (COLA)
   • College of American Pathology (CAP)

8) Comprehensive Outpatient Rehabilitation Facilities
   • The Joint Commission (TJC)
   • Commission on Accreditation of Rehabilitation Facilities (CARF)

9) Outpatient Physical Therapy Providers
   • American Association for Accreditation of Ambulatory Surgical Services (AAAASF)
   • If no Accreditation, must be certified by Medicare (Must have Medicare Part A)

10) Outpatient Speech Pathology Providers
   • American Association for Accreditation of Ambulatory Surgical Services (AAAASF)
   • If no Accreditation, must be certified by Medicare (Must have Medicare Part A)

11) Providers of End-stage Renal Disease Services (Dialysis)
   • The Joint Commission (TJC)
   • If no Accreditation, must be certified by Medicare

12) Birth Centers
   • Commission for the Accreditation of Birth Centers (CABC)

13) Congregate Living Health Facility
   • The Joint Commission (TJC)

14) Outpatient diabetes self-management training Providers
   • American Association of Diabetes Educators (AADE)
   • Indian Health Service (IHS)

15) Portable X-Ray Supplier
   • Federal Drug Administration (FDA) Certification

16) Rural Health Clinics
   • The Joint Commission (TJC)
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- American Association for Accreditation of Ambulatory Surgical Facilities (AAAASF)
- If no Accreditation, must be certified by Medicare

17) Federally Qualified Health Centers

- The Joint Commission (TJC)
- If no Accreditation, must be certified by Medicare

3. Must conduct an onsite quality assessment if the Provider is not accredited. Policy must include:
   a. Onsite quality assessment criteria for each type of Provider.
   b. A process ensuring that the Providers credential their Practitioners.
   c. Delegates policy may specify it only contracts with accredited Providers to meet this requirement.
   d. A CMS or state quality review in lieu or a site visit under the following circumstances (if the Delegate chooses to substitute the site visit with a with a CMS or state quality review), if it meets the following requirements:
      1) The CMS or state review is no more than three (3) years old.
         - If the CMS or state review is older than three (3) years, the organization conducts its own onsite quality review.
      2) Delegate obtains a survey report or letter from CMS or the state, from either the Provider or the agency, stating that the facility was reviewed and passed inspection.
         - The report meets the Delegates quality assessment criteria or standards.
      3) The Delegate is not required to conduct a site visit if the state or CMS has not conducted a site review of the Provider and the Provider is in a rural area, as defined by the U.S. Census Bureau.

B. Delegates’ policies and procedures must state which organizational Providers types are contracted and the Delegate is responsible for claims payment, which includes, but is not limited to:

1. Hospitals
2. Home Health Agencies
3. Skilled Nursing Facilities
4. Free-Standing Surgical Centers
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5. Clinical Laboratories in its assessment
6. Hospices
7. Comprehensive Outpatient Rehabilitation Facilities (CORF)
8. Outpatient Physical Therapy Providers (only applies to institutional facilities who take Medicare Part A. Does not apply to independently licensed Physical Therapists (PTs)).
9. End-Stage Renal Disease Services Providers
10. Outpatient Diabetes Self-Management Training Providers
11. Portable X-Ray Suppliers
12. Rural Health Clinics (RHC)
13. Federally Qualified Health Centers (FQHC)
14. If Delegate policies and procedures address all Provider types, the Delegate will not need to specify which types they do not contract with.

C. IEHP’s delegation arrangements with Delegates “carves out” behavioral healthcare services, therefore, Delegates are not responsible for the initial and ongoing assessment for behavioral healthcare facilities providing mental health or substance abuse services in the following settings:

1. Inpatient

D. Behavioral Healthcare Facilities providing mental health or substances abuse services in Residential and Ambulatory settings are not covered as an IEHP benefit, therefore IEHP is not responsible for the initial and ongoing assessment. Delegates must assess contracted medical health care Providers, organizational Providers, against the requirements and within the time frame. The Delegate may:

1. Use a comprehensive spreadsheet or log showing credentialing of Medical organizational Providers, to calculate compliance and completion of the File Review.
2. Delegates must have a tracking mechanism for ensuring that expirables and tri-annual reviews are compliant.

E. Delegates are not responsible for assessing Behavioral Healthcare Providers against the requirements and timeframe standards.

F. If during the contract period, the Delegate becomes aware of a change in the accreditation and/or CMS Site Survey, license, certification status, sanctions, fraudulent activity or other legal or remedial actions have been taken against any Provider, the Delegate must:

1. Notify IEHP’s Compliance Department by emailing compliance@iehp.org or fax (909) 477-8536 or via Compliance Hotline (866) 355-9038 within five (5) business days of discovering any of our Providers have been added to disciplinary or exclusionary lists.
2. The Director of Provider Contracting informs the Provider in writing that it is in violation of its contract with IEHP and begins the cure process. Depending on the seriousness of the offense, IEHP:

   a. Reserves the right to temporarily suspend or terminate the contract for cause, with appropriate notice as defined in the IEHP Provider Agreement;

   b. May report the termination of the contract to regulatory agencies as per contractual requirements and any services provided after the date of exclusion shall not be reimbursable or may be subject to recoupment.

REFERENCES:

A. NCQA, 2019 HP Standards and Guidelines, Credentialing and Recredentialing (CR) 7.
B. Medicare Managed Care Manual, Chapter 6 § 70.
C. Medi-Cal Law, Welfare and Institutions Code (W&I Code), § 14043.6 and 14123.
D. DHCS All Plan Letter (APL) 19-004 supersedes APL 17-019, “Provider Credentialing/Recredentialing and Screening/Enrollment”.
E. Department of Health Care Services (DHCS) All Plan Letter (APL) 18-022 supersedes 16-017 and APL 15-017, “Provision of Certified Midwife and Alternative Birth Center Facility Services”.
F. Knox-Keene Act of Title 28.
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B. Credentialing Standards

8. Delegation of Credentialing

APPLIES TO:

A. This policy applies to all organizations delegated credentialing activities for IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid) line of business.

POLICY:

A. IEHP remains responsible for credentialing and recredentialing its Practitioners, even if it delegates all or part of these activities. IEHP Delegates authority for performing the functions within the National Committee for Quality Assurance (NCQA)/Centers for Medicare and Medicaid Services (CMS) standards to another entity; however, the delegate must maintain responsibility for ensuring that the function is being performed according to organization expectations and to NCQA standards.

B. If the Delegate subdelegates any NCQA-required credentialing activities, there is evidence of oversight of the delegated activities.

PURPOSE:

A. IEHP remains responsible for credentialing and recredentialing its Practitioners, even if it delegates all or part of these activities. Delegates are required to monitor the credentialing and recredentialing status and performance of their contracted Practitioners on a continuous basis in compliance with IEHP requirements and current NCQA, state and federal regulatory guidelines.

B. Delegates must verify that sub-delegates perform the functions discussed in Section 25, of the Provider Manual and what is outlined in the Delegation Agreement between the Delegate and the sub-delegate.

C. IEHP and any regulatory oversight agency, has the right, within two (2) working days advance notice to the Delegate, to examine the Delegates credentialing/recredentialing files or sites as needed to perform oversight of all Practitioners or to respond to a complaint or grievance.

DEFINITION:

A. Delegate: If IEHP gives another organization (i.e. Credentials Verification Organization (CVO), Independent Practice Association (IPA), Specialty Network, etc.) the authority to perform certain functions on its behalf, this is considered delegation, e.g. Primary Source Verification of License, collection of the application, verification of board certification. The Delegated Entity is referred to as a Delegate.

1. Subdelegate: If the Delegate delegates certain functions on its behalf to another organization (i.e. CVO, MSO etc.), this is considered subdelegation, and the organization would be considered a Subdelegate. The Delegate will be responsible for subdelegation oversight.
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   a. Ongoing Monitoring or data collection and alert service are NOT seen as delegation.
   b. If information is gathered from a company website and the Delegate staff is pulling the queries for OIG or other types of queries, it is NOT considered delegation.

B. NCQA defines “annual” for this section as “A twelve (12) month period, with a two (2) month grace period.”

PROCEDURES:

A. For all Credentialing delegation arrangements, Delegates must have a delegation agreement that describes all delegated Credentialing (CR), that includes:
   1. A mutual agreement that documents delegation activities are mutually agreed on before delegation begins, in a dated, binding document or communication between the organization and the delegated entity.
      a. Effective date may be at the front of the delegation agreement.
      b. If date is not in the front, the latest signatory date from both parties will be used as the effective date.
   2. The delegation agreement or addendum thereto or other binding communication between the organization and the delegate specifies the CR activities:
      a. Performed by the delegate in detailed language.
      b. Not delegated but retained by the organization.
         1) If the delegate subdelegates an activity, the delegation agreement must specify which organization is responsible for oversight of the subdelegate.
      c. The delegation agreement(s) must have language that the delegate will adhere to state and federal regulations.
         1) This language is not required for Credentialing Verification Organization (CVO) Agreements.
   3. Delegate must determine the method of reporting and the content of the reports, but the agreement specifies:
      a. The reporting is at least semi-annually for DualChoice Line of business. Reporting examples include:
         1) Lists of credentialed and recredentialed providers.
         2) Committee meeting minutes.
         3) Facilities credentialed.
      b. What information is reported by the delegate about delegated activities.
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c. How, and to whom, information is reported (i.e. joint meetings or to appropriate committees or individuals in the organization).

d. Delegate must receive regular reports from all subdelegates, even California Department of Health Care Services (NCQA) Accredited or NCQA Certified delegates.

4. Delegates Delegation Agreement states the process for monitoring and evaluating the delegate’s performance.

5. Delegate retains the right to approve, suspend and terminate Providers, who participate in the Delegates’ network.
   a. This does not apply if the subdelegate does not have decision making authority.

6. If the subdelegate fails to meet the terms of the agreement and, at a minimum, circumstances that result in revocation of the agreement.

B. For new delegation arrangements, the Delegate must evaluate the subdelegates capacity to meet NCQA, state and federal regulatory requirements before delegation began.

1. Delegates may use an accredited Health Plan audit as the pre-delegation evaluation.
   a. If Delegate uses a health plan audit, there must be evidence that the health plan audit was reviewed, e.g. Committee minutes, email approval or other methods indicating acceptance of review.
   b. If Delegate changes Management Services Organizations (MSOs), the Delegate must evaluate the new MSO prior to contracting.

2. For any amendments or newly delegated activities within the last twelve (12) months, the Delegate must have documentation, dated before the delegation began showing that it evaluated the subdelegate before implementing delegation.

3. If the pre-delegation evaluation was performed more than twelve (12) months prior to implementing delegation, the Delegate must conduct another pre-delegation evaluation.

4. The Delegate must have a systematic method for conducting this evaluation, especially if more than one (1) delegation agreement is in effect. The following list are examples:
   a. Site Visit.
   b. Written review of the subdelegate’s understanding of the standards and the delegated tasks.
   c. Staffing capabilities.
   d. Performance records (e.g. Audit).
   e. Exchange of documents and review.
   f. Pre-delegation/Committee meetings.
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  g. Telephone consultation.
  h. Virtual review.

C. For delegation arrangements in effect for twelve (12) months or longer the Delegate must:

1. Annually review its delegate’s credentialing policy and procedures.
   a. Review for evidence that the Delegate’s staff or committee annually reviewed their subdelegate’s credentialing policies and procedures, e.g. audit tool, audit correspondence, audit summary documentation, committee minutes, and email approval, noted in their database or other methods.
   b. A Delegate may use an accredited health plan audit as the annual evaluation.
      1) If Delegate uses a health plan audit, there must be evidence that the health plan audit was reviewed, e.g. Committee minutes, email approval or other methods indicating acceptance of review.
      2) For NCQA-Certified or Accredited Delegates, including certified CVOs:
         • Review evidence of annual review of policy and procedures for delegated functions, as applicable.

2. Annually audits credentialing and recredentialing files against NCQA, state and federal regulatory standards for each year that delegation has been in effect.
   a. Review for evidence that the Delegate’s staff or committee annually reviewed their subdelegate’s credentialing policies and procedures, e.g. audit tool, audit correspondence, audit summary documentation, committee minutes, and email approval, noted in their database or other methods.
   b. A Delegate may use an accredited health plan audit as the annual evaluation.
      1) If Delegate uses an accredited health plan audit, there must be evidence that the health plan audit was reviewed, e.g. Committee minutes, email approval or other methods indicating acceptance of review.
      2) If Delegate does not use an accredited health plan audit, the Delegate must audit per IEHP standards (See Attachment, “Credentialing DOA Audit Tool” in Section 25).

3. Annually evaluates delegate performance against NCQA, state and federal regulatory standards for delegated activities.
   a. The audit must include all pieces of the credentialing process (e.g., policies and procedures, ongoing monitoring, file audit, etc.).

4. Semi-annually evaluates regular reports, as specified in element A. Acceptable methods of review include:
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   a. Assess the Quality or Credentialing Committee Minutes.
   b. It is acceptable to only receive lists of credentialed and recredentialed Practitioners from NCQA-accredited or NCQA-certified delegates.
   c. Delegates that are not NCQA-accredited or NCQA-certified need to demonstrate that it collects credentialing data from the delegate, evaluates the data, and takes corrective action if needed and follow-up on deficiencies.
   d. If no performance issues are identified, reporting could be limited to lists of credentialed and recredentialed Practitioners.
   e. For MSOs, reviewing reporting numbers which can usually be found in the Quality Improvement Meeting Minutes.

5. For delegation arrangements that have been in effect for more than twelve (12) months, at least in the past year, the organization identified and followed up on opportunities for improvement, if applicable.
   a. Findings from the Delegates pre-delegation evaluation, annual evaluation, file audits or ongoing reports can be sources for identifying areas of improvement for which it takes actions.
   b. The Delegate can use an accredited health plan audit to look for opportunities for improvement. If the Delegate sees that the health plan found opportunities for improvement, the Delegate reviews the corrective action plan (CAP) from the delegated entity and reviews to see if the audit and CAP were reviewed and approved, i.e. committee minutes, email approval or other method indicating acceptance of review of the CAP.

REFERENCES:

A. NCQA, 2019 HP Standards and Guidelines, Credentialing and Recredentialing (CR) 1, 2, 3, 4, 5, 6, 7, and 8.
C. Medicare Managed Care Manual, Chapter 11 § 110.2.
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9. Identification of HIV/AIDS Specialists

APPLIES TO:

A. This policy applies to all organizations delegated credentialing activities for IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid) lines of business.

POLICY:

A. Delegate has written policy and procedure regarding the identification of HIV/AIDS Specialists.

B. Delegate identifies or reconfirms the appropriately qualified physician who meet the definition of an HIV/AIDS Specialist on an annual basis.

C. The list of identified qualifying physicians is provided to the department responsible for authorizing standing referrals.

DEFINITION:

A. Delegate – If IEHP gives another organization (i.e. Credentials Verification Organization (CVO), Independent Practice Association (IPA), Specialty Network, etc.) the authority to perform certain functions on its behalf, this is considered delegation, e.g. Primary Source Verification of License, collection of the application, verification of board certification. The Delegated Entity is referred to as a Delegate.

1. Subdelegate: If the Delegate delegates certain functions on its behalf to another organization (i.e. CVO, MSO etc.), this is considered subdelegation, and the organization would be considered a subdelegate. The Delegate will be responsible for subdelegation oversight.
   a. Ongoing Monitoring or data collection and alert service are NOT seen as delegation.
   b. If information is gathered from a company website and the Delegate staff is pulling the queries for OIG or other types of queries, it is NOT considered delegation.

PROCEDURES:

A. Delegate has a written policy and procedure describing the process that the Delegate identifies and verifies the appropriately qualified physicians who meet the definition of an HIV/AIDS Specialist. An HIV/AIDS Specialist is a Physician who holds a valid, unrevoked and unsuspended certificate to practice medicine in the State of California, who meets any one of the four (4) criterion below:

1. Is credentialed as an HIV specialist by the American Academy of HIV Medicine (AAHIVM);

2. Is board certified, or has earned Certificate of Added Qualifications, in the field of HIV medicine granted by a member board of the American Board of Medical Specialties,
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should a member board of that organization establish board certification, or a Certificate of Added Qualifications, in the field of HIV medicine; or

3. Is board certified in the field of Infectious Disease by a member board of the American Board of Medical Specialties and meet the following qualifications:

a. In the immediately preceding twelve (12) months has clinical managed medical care to a minimum of twenty-five (25) patients who are infected with HIV; and

b. In the immediately preceding twelve (12) months has successfully completed a minimum of fifteen (15) hours of category 1 continuous medical education (CME) in the prevention of HIV infection, combined with diagnosis, treatment, or both, of the HIV-infected patients, including a minimum of five (5) hours related to antiretroviral therapy per year.

4. Meets the following qualifications:

a. In the immediately preceding twenty-four (24) months has clinically managed medical care to a minimum of twenty (20) patients who are infected with HIV; and

b. Has completed any of the following:

1) In the immediately preceding twelve (12) months has obtained board certification or recertification in the field of infectious disease from a member board of the American Board of Medical Specialties; or

2) In the immediately preceding twelve (12) months has successfully completed a minimum of thirty (30) hours of category 1 continuing medical education in the prevention of HIV infection, combined with diagnosis, treatment of both, of HIV-infected patients.

3) In the immediately preceding twelve (12) months has successfully completed a minimum of fifteen (15) hours of category 1 continuing medical education in the prevention of HIV infection, combined with diagnosis, treatment, or both, of HIV-infected patients and has successfully completed the HIV Medicine Competence Examination administered by the American Academy of HIV Medicine.

B. Delegate identifies or reconfirms the appropriately qualified physician who meet the definition of an HIV/AIDS Specialist, on annual basis. Delegate must provide:

1. Evidence that the Delegate identifies HIV/AIDS Specialists on an annual basis.
   a. This does not require screening of all the Delegate’s practitioners, only those who potentially may qualify and wish to be listed as HIV/AIDS Specialists.
   b. The department responsible for standing referrals may conduct the annual survey, instead of the Credentialing Department.
   c. Annual screening must be completed within twelve (12) months of prior’s years.
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   9. Identification of HIV/AIDS Specialists

   annual screening.

   C. The list of identified qualifying physicians is provided to the department responsible for
      authorizing standing referrals.

      1. Once the Delegate has determined which, if any, of its physicians qualify as HIV/AIDS
         Specialists under the above regulations, this list of qualifying practitioners is sent (e.g. e-
         mail, letter) or made available to the department responsible for authorizing standing
         referrals.

         a. Distribution of findings must be communicated within thirty (30) days from the
            completion of the screening/survey assessment (e.g. Use the date of the last survey
            collected/signed to begin your calculation).

            1) A verbal statement that the list was provided to the appropriate department is
               not acceptable evidence of compliance.

         b. If the survey revealed that there are no qualified contracted HIV/AIDS Specialists
            within the Delegate, communication regarding HIV/AIDS Specialists availability to
            the appropriate department (e.g. Utilization Management or Case Management) is all
            that is necessary.

REFERENCES:

A. California Health & Safety Code § 1374.16.
B. DMHC TAG (QM – 004).
C. DHCS MMCD All-Plan Letter 01001.
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10. Credentialing Quality Oversight of Delegates

APPLIES TO:

A. This policy applies to all organizations delegated credentialing activities for IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid) line of business.

POLICY:

A. Delegates must obtain approval of Practitioners seeking participation in the IEHP network, from the Delegates Credentialing Committee and/or Medical Director before submitting the Practitioner to IEHP, for review and approval. Delegates must confirm the Practitioners meet IEHPs criterion as specified in Policy 25B1, “Credentialing Standards – Credentialing Policies.”

B. If a Practitioner is changing from one (1) Delegated IPA to another, the new Delegated IPA must submit the Providers documentation (as noted in Procedure A below) within sixty (60) calendar days of the effective date of the change.

C. All Delegates are responsible for recredentialing and/or employed Practitioners within the thirty-six (36) months of the last credentialing decision, as required by National Committee for Quality Assurance (NCQA). Delegates are required to report their recredentialing activities to IEHP. Delegates must report recredentialing activities and terminations by the 15th of the following month.

D. All Practitioner terminations and changes (i.e. Address, specialty, age limits, Supervising Physicians, TIN changes etc.) must be submitted to providerrelationsinbox@iehp.org. All changes and terminations submitted through the Secure File Transfer Protocol (SFTP) server will not be processed.

E. Delegates must provide IEHP with a status report of their specialty network on a semi-annual basis during Provider Directory review. Delegates that do not require their Providers to be listed in the Provider Directory submit specialty networks quarterly.

F. Delegated IPAs must have established processes for outpatient and inpatient Utilization Management and are responsible for reviewing, maintaining and notifying IEHP of any changes to their Hospital admitting arrangements for each of their affiliated links.

PURPOSE:

A. IEHP must receive reports from its Delegates at least semiannually. At a minimum, Delegates must report its progress in conducting credentialing and recredentialing activities, and on performance-improvement activities, if applicable. Findings from the Delegates pre-delegation evaluation, annual evaluation, file audit or ongoing reports can be sources to identify areas of improvement for reporting. Areas could be related to NCQA credentialing standards or to IEHPs expectations.
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B. In addition to IEHP’s quality oversight, Delegated IPAs are expected to monitor the performance of their credentialed Practitioners on a continuous basis and to review any performance issues as may be applicable during the recredentialing process obtained by the Delegated IPA, from other sources or IEHP

DEFINITION:

A. Delegate: If IEHP gives another organization (i.e. Credentials Verification Organization (CVO), Independent Practice Association (IPA), Specialty Network, etc.) the authority to perform certain functions on its behalf, this is considered delegation, e.g. Primary Source Verification of License, collection of the application, verification of board certification. The Delegated Entity is referred to as a Delegate.

1. Subdelegate: If the Delegate delegates certain functions on its behalf to another organization (i.e. CVO, MSO etc.), this is considered subdelegation, and the organization would be considered a Subdelegate. The Delegate will be responsible for subdelegation oversight.

a. Ongoing Monitoring or data collection and alert service are NOT seen as delegation.

b. If information is gathered from a company website and the Delegate staff is pulling the queries for Office of Inspector General (OIG) or other types of queries, it is NOT considered delegation.

PROCEDURES:

A. Delegates must obtain approval of Practitioners seeking participation in the IEHP network, from the Delegates Credentialing Committee and/or Medical Director before submitting the Practitioner to IEHP, for review and approval.

1. All credentialing file information must be submitted to IEHP via the SFTP, into the Delegates assigned ‘Credentialing’ Folder.

a. Once the upload is complete, the Delegate must take a screenshot showing the files uploaded into the ‘Credentialing’ Folder. The Delegate will need to email Provider Delegation at CredentialingProfileSubmission@iehp.org notifying IEHP when the credentialing files are posted.

1) IEHP will then respond to your email with a confirmation that you are credentialing files were located.

• Upon receipt of credentialing files into the Delegates SFTP ‘Credentialing’ folder, IEHP will begin the credentialing process. Submitted files will be forwarded to IEHP Credentialing for processing.
B. Credentialing Standards
10. Credentialing Quality Oversight of Delegates

- For all Primary Care Physicians (PCPs), Obstetrics/Gynecology (OB/GYNs) and Urgent Care’s, once all credentialing information is received, IEHP’s Credentialing Department will request for a facility site review with IEHP’s Quality Management (QM) Department, in accordance to Policy 6A, “Site Review and Medical Record Review Survey Requirements and Monitoring.”

- If a Practitioner’s submission packet is incomplete and/or missing supporting documentation, the Delegate is notified via email with the reason why the process was terminated for the Practitioner. The Delegate must resubmit all documents again, to include missing information to IEHP for review and reconsideration.

- Credentialing Files submitted through any other methods will be rejected and the Delegate will be directed to submit the files via the SFTP.

2. The Delegate must submit the following for review and consideration:
   a. Contract (1st and signature pages)
      1) To include any applicable addendums to show the Practitioner’s relationship or affiliation with that contract.
   b. W-9 for all Tax Identification Numbers (TINs) used by the Practitioner.
   c. Delegation of Services Agreement & Supervising Physician Form (applicable to Physician Assistants (PAs) only).
   d. Standardized Procedures (applicable to Nurse Practitioners (NPs) and Nurse Midwives (NMs) only).
   e. Hospitalist Group or Admitter Agreement arrangements, if applicable, must include:
      1) Hospitalist Group or Admitter Agreement with Delegate.
      2) Hospitalist Group or Admitter Specialty.
      3) Hospitalist Group or Admitter age range covered.
      4) Name of Hospital affiliated with the Agreement.
      5) Hospitalist Group or Admitter’s W-9.
   f. Practitioner Profile or spreadsheet that includes all the elements listed below, otherwise, it will be rejected back to the Delegate with the reason for review and resubmission.
## 25. DELEGATION AND OVERSIGHT

### B. Credentialing Standards

#### 10. Credentialing Quality Oversight of Delegates

<table>
<thead>
<tr>
<th>PROVIDER PROFILE ELEMENT(S)</th>
<th>Primary Care Physician (PCP)</th>
<th>Specialist (SCP)</th>
<th>Mid Level (ML)</th>
</tr>
</thead>
<tbody>
<tr>
<td>IPA Name</td>
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<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Line(s) of Business</td>
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<td>✓</td>
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<td>✓</td>
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<td>Identifier as to whether the Practitioner is a PCP, Specialist, or Mid-Level Practitioner</td>
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<td>Practitioner Name as it’s listed on License to Practice</td>
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</tr>
<tr>
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</tr>
<tr>
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<tr>
<td>Practitioner Phone and Fax numbers</td>
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<td>✓</td>
</tr>
<tr>
<td>Practitioner Office Hours</td>
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<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Practitioner Date of Birth (D.O.B.)</td>
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<td>✓</td>
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</tr>
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<tr>
<td>Practitioner Tax Identification Number(s)</td>
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</tr>
<tr>
<td>Practitioner License Number and expiration date</td>
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</table>
### 25. DELEGATION AND OVERSIGHT

#### B. Credentialing Standards

10. Credentialing Quality Oversight of Delegates

<table>
<thead>
<tr>
<th>Primary Care Physician (PCP)</th>
<th>Specialist (SCP)</th>
<th>Mid Level (ML)</th>
<th>PROVIDER PROFILE ELEMENT(S)</th>
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<tr>
<td>21.</td>
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<td>Hospital Affiliations (Hospital Name, Status, and Type of Service provided - Specialty)</td>
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<td>✅</td>
<td>Hospital Admitter arrangements (Name of Hospital, Name of Admitter)</td>
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<tr>
<td>23.</td>
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<td>Malpractice Insurance Coverage (Name of carrier, policy number, coverage per claim, coverage per aggregate and expiration date)</td>
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<td>26.</td>
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<tr>
<td>30.</td>
<td></td>
<td></td>
<td>Name of Supervising Physician</td>
</tr>
<tr>
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</tr>
<tr>
<td>32.</td>
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<td>✅</td>
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</tr>
</tbody>
</table>

3. Upon receipt of the documentation, IEHPs Credentialing Department performs a quality review of each delegate’s credentialed and approved Practitioner to ensure compliance with IEHP’s guidelines (See Policy 5A, “Credentialing Standards – Credentialing Policies”).

a. The Practitioner review includes, but is not limited to the following:
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1) Review of credentialed Practitioner specialty and relevant education, training, practice experience.

2) Review of requested age range

3) Review of Hospital arrangements, if applicable

4) Review of adverse history;
   - Malpractice history;
   - History of negative license action;
   - History of negative privileges action;
   - History of Medicare or Medicaid sanctions; and
   - Other adverse history (including felony convictions, etc.).

b. In cases where the Delegated IPA submitted credentialing information is consistent with IEHP guidelines, no adverse history is present, and the Practitioner has successfully passed IEHP’s site review (if applicable), the PCPs, Specialists, and Mid-Levels are reviewed and signed off by Credentialing Department.

c. In cases where either the Delegate(s) submitted credentialing information is inconsistent with IEHP guidelines or data, or there is evidence of significant adverse history, the Practitioner is forwarded to the IEHP Peer Review Subcommittee for further review.

1) For files whose information is inconsistent with IEHP guidelines or data, the Credentialing Department will notify the respective Delegate(s) and Practitioner, if needed, for clarification and correction, if needed. If the discrepancy is clarified and consistent with IEHP standards and data, the files are reviewed and signed off by the Credentialing Specialist.
   - Files that require further review are referred to the Peer Review Subcommittee for review, discussion and decision.

2) For files who have evidence of significance adverse history, the Practitioner is forwarded to the Peer Review Subcommittee for review. The IEHP Medical Director presents the Practitioner’s credentialing file and any other necessary supporting documentation from the Delegated IPA, Practitioners, or IEHP to determine if potential quality of care issues for Members exists.
   - If the IEHP Peer Review Subcommittee determines that no potential quality of care concern exists, no further action or review is undertaken.
   - The IEHP Peer Review Subcommittee reviews all pertinent information necessary. The IEHP Peer Review Subcommittee determines if there is a
potential quality of care concern or adverse event that exists. The Peer Review Subcommittee may make recommendations to improve the performance of a Practitioner, that includes but is not limited to:

- Request for additional information from the Delegate, with review at next meeting;
- Individual counseling by the Delegate or IEHP Medical Director;
- Focused audits of Practitioner’s practice by IEHP Quality Management staff;
- Continuing medical education or training;
- Restriction of privileges, including age range restrictions or other limitations;
- Termination of the Practitioner from the IEHP network; and
- Any other action appropriate for the circumstances

3) Actions by the IEHP Peer Review Subcommittee that differ from the Delegated IPA Credentialing Committee decisions, including changes in privileges and termination are tracked by IEHP.

- The IEHP Medical Director reviews the tracking report, the credentialing files and any other supporting information as necessary.
- After review, IEHP takes any of the following action(s) against the delegate:
  - No action;
  - Verbal or written request for additional information from the Delegate’s Medical Director;
  - Request an interim focused credentialing audit of the Delegate by IEHP staff; or
  - Any other action as appropriate, including revocation of delegated credentialing responsibilities.

B. If a Practitioner is changing from one (1) Delegated IPA to another, identified as a “pend change,” the new Delegated IPA must submit the Provider’s documentation (as noted in Procedure A above) within sixty (60) calendar days of the effective date of the change.

1. Failure to meet this timeframe will result in “freezing” the Provider to auto-assignment of Member or possible termination.
   a. Delegated IPAs who have outstanding “Pend changes” will be placed on a Corrective Action Plan (CAP) until all documents are submitted.

C. All Delegates are responsible for recredentialing and/or employed Practitioners within the
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thirty-six (36) months of the last credentialing decision, as required by NCQA. By the 5th of every month, IEHP will post the Delegates outstanding recredentialing report to the SFTP Server. Delegates are required to review these reports and ensure that the Providers identified on the report are submitted to IEHP with their new recredentialing dates. These dates are used to conduct file selections for the Delegates Delegation Oversight Audit for Credentialing.

Failure to submit the current recredentialing dates will result in an administrative termination from the IEHP network. The Delegate will have to submit the Providers information for IEHP Delegated credentialing review, for the Provider to participate in the IEHP network again.

Delegates are required to report their recredentialing activities via excel format. (See Attachment, “Credentialing and Recredentialing Report”, in Section 25). Delegates must report recredentialing activities and terminations by the 15th of the following month.

1. The spreadsheet must include the following information:

REcredentialing activities:

<table>
<thead>
<tr>
<th>PCP</th>
<th>SCP</th>
<th>ML</th>
<th>REcredentialing Report Element(s)</th>
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<td>IPA Name</td>
</tr>
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<td>✓</td>
<td>✓</td>
<td>Previous Credentialing Date</td>
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<tr>
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<td>Recredentialing Date</td>
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</tr>
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<td>✓</td>
<td>✓</td>
<td>Last Name</td>
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<tr>
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<td>✓</td>
<td>✓</td>
<td>First Name</td>
</tr>
<tr>
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<td>✓</td>
<td>✓</td>
<td>Middle Initial (M.I.)</td>
</tr>
<tr>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Suffix</td>
</tr>
<tr>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Degree</td>
</tr>
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</tr>
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<td>✓</td>
<td>Board Certification (2)</td>
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</table>
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<table>
<thead>
<tr>
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<td>R.</td>
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TERMINATIONS:

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<tr>
<td>C.</td>
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<td>✓</td>
<td>✓ Recredentialing Date</td>
</tr>
<tr>
<td>D.</td>
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<td>✓</td>
<td>✓ License#</td>
</tr>
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<td>✓</td>
<td>✓ Type (i.e. PCP, SCP, ML)</td>
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<td>✓</td>
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<td>✓ Last Name</td>
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<tr>
<td>G.</td>
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<td>✓ First Name</td>
</tr>
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<tr>
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<td>✓</td>
<td>✓ Termination Due to Quality of Care (Yes or No)</td>
</tr>
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D. All Practitioner terminations and changes (i.e. Address, specialty, age limits, Supervising Physicians, Taxpayer Identification Number (TIN) changes etc.) must be submitted to providerrelationsinbox@iehp.org. All changes and terminations submitted through the SFTP server will not be processed. (See Policy 18, “Provider Network”).

1. PCP relocations must pass a California Department of Health Care Services (DHCS)
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required FSR Survey and close CAPs prior to receiving assignment of members, within thirty (30) days upon relocation or the date IEHP discovers that the PCP site moved, and a minimum every three (3) years thereafter, unless it was determined that they be placed on annual review. (See Policy 6A, “Facility Site Review and Medical Record Survey Requirements and Monitoring”).

2. Changes in Specialty and age limits are considered practice parameter expansions and reductions and submit the required documentation in Policy 25B1, “Credentialing Standards - Credentialing Policies”).

3. Mid-Levels (PAs, NMs, and NPs) relocating or changing supervising Physicians, Delegates must provide a current copy of the following documents to ensure compliance with IEHP guidelines (See Policy 6F, “Non-Physician Practitioner Requirements”).

a. Physician Assistants (PAs) may act as an agent of the supervising Physician in which they have an agreement. A Delegation of Services Agreement may authorize a PA to provide or perform the following activities as long as there is documentation evidencing the activity was actually performed:

1) Physician examinations, including interscholastic athletic program examinations;

2) Order durable medical equipment (DME) and make arrangements with regard to home health services or personal care services, as applicable. For home health and/or personal care services, after consultation with the supervising Physician, the PA may approve, sign, modify or add to the plan of treatment of care.

3) Routine visual screenings, which includes non-invasive, non-pharmacological, simple testing for visual acuity, visual field defects, color blindness and depth perception.

Physician Assistants and Supervising Physicians must have the following documents current, in place, and readily available on-site subject for review:

4) Delegation of Services Agreement and Supervising Physician Form. (See Attachment, “Delegation of Services Agreement and Supervising Physician Form” in Section 5), This agreement must define specific services identified in practice protocols or specifically authorized by the supervising Physician., and

- Both the Physician and PA must attest to, date and sign the document;
- PAs must be practicing at a site assigned to their supervising physician;
- An original or copy must be readily accessible at all practice sites in which the PA works; and
- The agreement must be reviewed, dated and signed annually; and provided to IEHP, upon request.
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b. Nurse Practitioners (NPs) and Nurse Midwives (NMs) may perform the following procedures if a standardized procedure is in place:

1) To diagnose mental and physical conditions, to use drugs in or upon human beings, to sever or penetrate the tissue of human beings and to use other methods in the treatment of diseases, injuries, deformities or other physical or mental conditions.

2) Standardized Procedures must be on-site site specific and
   • Reference textbooks and other written sources to meet the requirements of Title 16, CCR § 1474 (3), must include:
     o Book (specify edition) or article title, page numbers and sections.
   • NP and/or NM must be practicing at a site assigned to their supervising physician; and
   • Standardized Procedures must be signed by both the Practitioner and the supervising Physician, initially and annually; and provided to IEHP, upon request. At minimum, the Delegate must collect and submit to IEHP:
     o Table of Contents of the Standardized Procedures used, between the NP and/or Certified Nurse Midwife (CNM) and supervising Physician, that references the textbook or written sources to meet the requirements of the Board of Registered Nursing.
     o Evidence that the Standards of Care established by the sources were reviewed and authorized by the nurse practitioner, Physician and administrator in the practice setting (i.e. signature page that includes all parties involved).
   • Standardized Procedures written using the Physician Assistants Delegation of Services Agreement and Supervising Physician Form format and/or verbiage is not accepted by IEHP.

4. Practitioner Terminations. All Delegates are required to notify IEHP of any adverse actions against any of their contracted Practitioners. Delegates must provide IEHP sixty (60) calendar days advance notice of any significant change in their network, including the termination of a Practitioner.

E. Delegates must provide IEHP with a status report of their specialty network on a semi-annual basis during Provider Directory review. Delegates that do not require their Providers to be listed in the Provider Directory submit specialty networks quarterly.

On a semi-annual basis, IEHP provides Delegates with the Specialty Roster information via online verification reports on the Secure Provider Portal including admitter and ancillary Providers previously submitted by the Delegate to IEHP that identifies the Delegate’s current
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Provider Network that includes: Practitioner name, address, phone number, license number, specialty type, Hospital affiliations, Delegated IPA credentialing committee dates and, for obstetricians only the Hospitals where they deliver. Delegates are required to verify and update the following information:

1. Delegated IPA Credentialing Committee Date must be completed for all Practitioners with the most recent Committee Date.
2. Indicate for each specialist listed, as applicable, the following:
   a. “New Hospital Privileges” – provided to indicate the Practitioner is adding new privileges with an IEHP network Hospital. Indicate privileges (active, courtesy, etc.).
   b. “New Hospital Link” – provided to indicate which network Hospital will be added to Practitioner.
   c. “Information is correct” – provided to specify information is correct and no changes are required.
   d. “Provider Term Date” – provided to indicate the Practitioner is no longer part of the Delegated IPA’s specialty network. Provide effective date of termination.
   e. “Term This Site Only” – provided to indicate the Practitioner is no longer at this location only. Provide effective date of location closure. Provide IEHP additional details on a separate sheet, if further review is required (i.e. provider is relocating, this site is the providers only existing location with IEHP and needs to add a different location.”
   f. “Updated information” – provided to specify new addresses, a typo, or any other changes to the information provided on the secure Provider Portal.
3. IEHP makes the indicated changes that will be reflected on the Delegated IPA’s roster.
   a. Delegates are required to update all information online and advise of completion to their Provider Service Representative within thirty (30) days of receipt. The online verification reports being made available in IEHP’s secure portal.

F. Delegated IPAs must have established processes for outpatient and inpatient Utilization Management and are responsible for reviewing, maintaining and notifying IEHP of any changes to their Hospital admitting arrangements for each of their affiliated links, through the following process:

1. The Provider Services Analyst emails all Delegates on the 15th of each month for verification of all Admitters to ensure accurate information is obtained.
2. Delegated IPAs are responsible for the following:
   a. Ensuring all providers listed with the correct Admitting Provider.
25. DELEGATION AND OVERSIGHT

B. Credentialing Standards
   10. Credentialing Quality Oversight of Delegates

   1) Any changes from the Delegated IPAs must be submitted by the 25\textsuperscript{th} of every month, via Secure File Transfer Protocol (SFTP) server.
      
      - The Delegated IPAs failure to respond by the 25\textsuperscript{th} of each respective month will result in non-compliance and may result in a corrective action plan on monthly delegation reporting.

   b. If there are changes, the Delegated IPAs are responsible for notifying the provider of the changes and of their current admitter arrangements for each respective hospital.

   c. For the Admitting Providers, the Delegated IPA confirms admitting privileges to the Hospitals they are admitting to, are in place and in good standing.

      1) The Delegated IPA is responsible for providing a replacement. If not, the Provider will be terminated from the Delegated IPA’s network for not having Hospital admitting arrangements, and;

   d. The Delegated IPA is responsible for reviewing the Specialist Providers and reconfirming their Hospital arrangements, to ensure that the Admitting Provider is:

      1) Within the same specialty;
      2) Cover the same age range;
      3) Within the same practice; and
      4) Active within the same Delegated IPA network as the referring Physician.

   e. Ensuring all Providers on the report are still active with the Delegated IPA.

   On the last day of the month all network Hospitals are emailed the final Admitter list for that month. It includes Admitters name, phone number and fax number for each Provider who utilizes a Hospital Admitter. If Hospitals find discrepancies, they are emailed back to the Credentialing Specialist, who verifies with the Delegated IPA’s credentialing contact.

REFERENCES:

A. California Code of Regulations § 1379, 1399.540, and 1474.

B. NCQA, 2019 HP Standards and Guidelines, Credentialing and Recredentialing (CR) 1, 2, 3, 4, 5, 6, 7, and 8.

C. Medicare Managed Care Manual Chapter 11 – Section 110.2
25. DELEGATION AND OVERSIGHT

C. Care Management Requirements
   1. IEHP Monitoring and Oversight

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

POLICY:
A. IEHP delegates care management activities to those IPAs that meet standards set by the Department of Health Care Services (DHCS), Department of Managed Health Care (DMHC), Centers for Medicare & Medicaid Services (CMS), and IEHP. Delegated responsibilities are outlined in Policy 25C2, “Care Management Requirements – Delegated IPA Responsibilities”.
B. IEHP monitors IPAs’ care management activities monthly, quarterly, annually, and as frequently as needed.

PROCEDURES:
A. IEHP Delegation Oversight staff monitors and supports Delegated IPAs’ care management activities through the review of Care Management (CM) report logs and files monthly, annually and as needed.
B. On a routine basis, through the delegation oversight process with the use of the IPA Care Management Review Tools (See Attachment, “Delegated IPA Care Management Review Tool” in Section 25), IEHP shall review the Delegated IPA’s care coordination/care management activities for elements which may include, but are not limited to, the following:¹
   1. A process for offering Care Management to all Members;
   2. A person-centered, outcome-based approach;
   3. Spanning medical and Long Term Services & Support (LTSS) systems, including coordination with In Home Support Services (IHSS), with a focus on transitions;
   4. Coordination with county agencies and IEHP, if applicable, for Behavioral Health services;
   5. Development of Individual Care Plans (ICP) with Members;
   6. Stratification levels for the care management program and appropriate stratification of Members;
   7. A process for Interdisciplinary Care Team meetings; and
   8. Frequency of care management contact for each care management stratification level.

¹ Coordinated Care Initiative (CCI) Three-Way Contract September 2019, Section 2.5.
25. DELEGATION AND OVERSIGHT

C. Care Management Requirements
   1. IEHP Monitoring and Oversight

   C. IEHP provides education and training on care coordination annually, per Delegated IPA request and as needs are identified through oversight activities.

   D. As described in policy MA_25C2, “Care Management Requirements – Delegated IPA Responsibilities,” IEHP delegates the responsibility of primary care management of their assigned Members to the IPAs. IEHP selects and reviews, at a minimum, five (5) targeted cases each month to ensure that CM requirements are met. Additional files may be selected depending on population size.

   E. As indicated in MA_25D3, “Quality Management – Corrective Action Plan Requirements”, all Delegates that score less than 90% may be required to submit a Corrective Action Plan (CAP) to remedy any deficiencies noted on the audit tool. Upon request, the Delegated IPA must submit a complete and comprehensive CAP to IEHP that adequately addresses all deficiencies noted.
25. DELEGATION AND OVERSIGHT

C. Care Management Requirements

2. IPA Responsibilities

APPLIES TO:

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

POLICY:

A. IEHP delegates the responsibility of primary care management (CM) of their assigned Members to the Delegated IPA. Delegated IPA care management responsibilities include, but are not limited to: care management program enrollment, care coordination, continuity of care, referral for services and development of an Individualized Care Plan (ICP) in collaboration with an Interdisciplinary Care Team (ICT) that is assembled to meet the needs of the Member.

B. The assigned Delegated IPA CM staff must include non-restricted California licensed medical personnel including but not limited to Registered Nurses, Licensed Vocational Nurses, Licensed Clinical Social Workers or master’s level Social Workers.

C. All IEHP DualChoice Members are required to be enrolled in a care management program, unless they choose to opt-out. The Delegated IPA is required to have a process where they offer care management to all Members and reassess at least annually or when there is a change in Member’s condition.

D. IEHP and its Delegated IPAs maintain procedures for monitoring the coordination of Members’ care, including but not limited to all medically necessary services delivered both within and outside the Delegated IPAs Provider network.

E. Delegated IPAs are responsible for coordinating care with Long-Term Services and Supports (LTSS) programs, which includes Multipurpose Senior Services Program (MSSP), In-Home Supportive Services (IHSS), and Community-Based Adult Services (CBAS). This also includes coordinating care with County Mental health clinics for Members who are receiving specialty mental health services.¹

F. Delegated IPAs are responsible for reporting care management activities to IEHP via IEHP’s Secure File Transfer Protocol (SFTP) for delegation oversight purposes.

PROCEDURES:

Care Management Program Description

A. IEHP and its Delegated IPAs will develop a care management program that includes:
   1. Evidence used to develop the program;
   2. Process for identifying Members who are eligible for the program;
   3. Stratification levels for the care management program;

¹ Coordinated Care Initiative (CCI) Three-Way Contract September 2019, Section 2.5.
25. DELEGATION AND OVERSIGHT

C. Care Management Requirements

2. IPA Responsibilities

4. Frequency of care management contact for each care management stratification level;

5. Defined program goals;

6. How the Delegated IPA will evaluate the effectiveness of their care management program; and

7. A process to evaluate Member satisfaction with the Delegated IPAs care management program.

Care Management Stratification and Health Risk Assessment (HRA)

A. IEHP and its Delegated IPAs must have a process to stratify Members in their CM program into at least two (2) categories (high/low). To stratify Members, IEHP and its Delegated IPAs are required to analyze data such as claims, encounters, utilization, pharmacy, Provider data, and Member data, which includes Health Risk Assessment (HRA), IHSS, CBAS, and MSSP data. Delegated IPAs are not required to adopt the IEHP’s stratification process but must have a process to adequately assess the risk of the Member as stated in their CM program description and/or policies and procedures.

1. Assessment of risk should include, at a minimum, the post-HRA risk score, utilization patterns, pharmacy data, medical history, behavioral health diagnosis, social determinants and enrollment into an LTSS program such as IHSS, CBAS or MSSP and CM assessment data.

2. HRA data that is made available to the Delegated IPA will identify the post-HRA risk level as High or Low. An HRA risk level of High indicates that the Member should be immediately reviewed for care management needs.

3. IEHP requires its Delegated IPAs to:
   a. Review the HRA results with the Member timely and assign a stratification;
   b. Document the review of the HRA in the medical management system;
   c. Post-HRA results or lack thereof within the medical management system;
   d. Address identified risks and the plans to mitigate; and
   e. Develop/update care plan with Member upon discussion of identified risks.

4. After review of the above information, if the Delegated IPA re-stratifies a Member’s risk score to a lower level, the Delegated IPA must be able to demonstrate the rationale for the decision.

5. IEHP and its Delegated IPAs will maintain policies and procedures for how they support Members with complex conditions that include:

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2 CCI Three-Way Contract September 2019, Section 2.8.
3 DHCS DPL 17-001.
4 CCI Three-Way Contract September 2019, Section 2.8.
25. DELEGATION AND OVERSIGHT

C. Care Management Requirements
   2. IPA Responsibilities

   a. Complex Case Management criteria/triggers that are relevant to their Member population;
   b. The process to determine timeframes for re-contact or reassessment at least annually or more frequently as health status changes; and
   c. Other relevant CCM details of the program.

B. IEHP is required to perform an initial HRA and annual reassessment on all IEHP DualChoice Members. IEHP uses a validated HRA tool that was developed to comply with the Department of Health Care Services (DHCS) and Centers for Medicare and Medicaid Services (CMS) guidelines. Members are assessed by either telephone, mail or in person. The Delegated IPA is responsible for utilizing this data to identify Members that may benefit from CM. Please see Policy 12A2, “Care Management Requirements – Health Risk Assessment” for more information.

Care Management/Care Plan

A. IEHP and its Delegated IPAs are required to develop an ICP within ninety (90) calendar days of the Member’s enrollment date.

B. The care plan must be developed with the Member’s participation and based on the specific health care needs of the Member. Care plans must include data obtained from the HRA, and input from the ICT.

C. The Member’s HRA completion date is found in the IEHP’s secure Provider portal within the “Health Risk Assessment Survey” PDF document. Please see Policy 12A3, “Care Management Requirements – Individual Care Plan” for more information on ICP development.

D. Delegated IPAs are expected to retrieve, and review completed HRAs from both the SFTP and Provider portal daily and outreach to the Member timely to update and/or develop ICP.

E. On the Provider portal, if IEHP is unable to contact the Member to complete their HRA, the HRA status under the “Assigned Roster” will display as “Incomplete.” The Delegated IPA shall continue to outreach to the Member for ICP completion within ninety (90) calendar days of the Member’s enrollment date. If the Member is successfully contacted, the ICP must be developed with the Member’s participation.

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5 CCI Three-Way Contract September 2019, Section 2.8.
6 Department of Health Care Services (DHCS) Duals Plan Letter (DPL)17-001 Supersedes DPL 15-005, “Health Risk Assessment and Risk Stratification Requirements for Cal MediConnect.”
7 CCI Three-Way Contract September 2019, Section 2.5.
8 CCI Three-Way Contract September 2019, Sections 2.5 and 2.8.
9 DHCS DPL 15-001 Supersedes 13-004, “Interdisciplinary Care Team and Individual Care Plan Requirements for Medicare-Medicaid Plans”.

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Medicare DualChoice Page 3 of 6
25.  DELEGATION AND OVERSIGHT

C. Care Management Requirements

2. IPA Responsibilities

F. In the event there is an IEHP-developed ICP, the Delegated IPA is expected to retrieve this care plan from the Provider portal daily to review, complete and/or update timely with Member.

G. ICPs can be developed without having HRA data and must be developed with the Member and/or their authorized representative.

H. ICPs must be updated at least annually, and whenever the Member’s condition changes or is assigned to a new PCP.

I. Successful Member outreach attempts must align with the date of ICP development or documentation must support discrepancies in dates.

J. If IEHP is unable to contact the Member to review the HRA or to complete an assessment, the Delegated IPA must make, at a minimum, three (3) separate contact attempts to locate the Member. Attempts must be documented (See Attachments, “Monthly Medicare Care Management Log” and “Monthly Medicare Care Plan Outreach Log” in Section 25).

1. Contact attempts must be made within thirty (30) calendar days of HRA status notification.

2. Attempts may be telephonic, by mail, by email, etc.

3. All contact attempts of the same type on the same day are considered one (1) attempt.

Interdisciplinary Care Team

A. IEHP and its Delegated IPAs are required to establish an ICT based on the needs of each Member. The Delegated IPA should have in place an ICT to support the Member in their plan of care. The Delegated IPA is encouraged to utilize the IEHP’s ICT as needed. The ICT must be person-centered and collaborate with the Member and each other to assist in the development of an individualized care plan and assist in the coordination of the Members health care needs.10,11 Please see Policy 12A9, “Care Management Requirements – Interdisciplinary Care Team,” for more information.

1. At a minimum, the ICT consists of the Member and/or Member’s authorized representative, the Member’s caregiver, the Care Manager, the IHSS Social Worker if the Member is receiving IHSS benefits, and the Primary Care Physician (PCP) or Specialist if the Specialist is serving as the Member’s PCP. Additional members may include social workers, specialists, Behavioral Health Providers, Medical Directors, Health Plan staff and other individuals that are actively involved in the Members care.

B. IEHP and its Delegated IPAs are required to.12

10 DHCS DPL 15-001.
11 CCI Three-Way Contract September 2019, Section 2.5.
12 CCI Three-Way Contract September 2019, Section 2.5.
25. DELEGATION AND OVERSIGHT

C. Care Management Requirements

2. IPA Responsibilities

1. Offer an ICT for each Member, which will be developed around the Member and ensure the integration of medical and LTSS and the coordination of Behavioral Health Services delivered by a county Behavioral Health agency and IHSS services, when applicable.

2. Conduct ICT meetings at least annually, also when there is an identified need, including at the Member’s discretion.

3. Sharing of information/outcomes related to ICT meetings with providers, county agencies and Member.

C. If a Member declines an ICT meeting, at a minimum the care manager must provide his or her contact information to the Member and re-visit the refusal at the time of reassessment, or if the Member’s PCP changes and must be documented within the medical management system.13

D. Member has the right to exclude any member from their ICT.

Care Management Interventions

A. IEHP and its Delegated IPAs will establish the frequency of their care management interventions based on their written policies and CM program description, as well as the Member’s identified goals, issues, barriers, and risks. IEHP and Delegated IPA Care Manager interventions include:

1. Ensuring continuity of care as appropriate;

2. Focus on providing services in the least restrictive setting;

3. Following up on Member referrals;

4. Identifying the needs for LTSS services, appropriate community-based resources such as housing/utilities, meals etc.;

5. Identifying the need for behavioral health services;

6. Communication with county mental health clinics to discuss diagnoses (medical, behavioral, and social needs), review treatment plans, and/or coordinate mental health services provided by the county with other services such as medical, LTSS, CBAS, MSSP, IHSS, etc. Documentation of outreach attempts must include:

   a. Name of the Member’s county mental health Provider/county clinic;

   b. Case Manager’s name who made the contact attempt;

   c. Date and time of the outreach attempt;

   d. The method of the outreach attempt (phone, email, fax, in-person); and

   e. The outcome of the outreach attempt.

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13 CCI Three-Way Contract September 2019, Section 2.5.
25. DELEGATION AND OVERSIGHT

C. Care Management Requirements

2. IPA Responsibilities

7. Member communication to discuss the Member’s mental health needs and services and how those services may be coordinated with other services such as medical, LTSS, CBAS, MSSP, IHSS, etc. Documentation of outreach attempts must include:
   a. Date and time of outreach attempt;
   b. The method of the outreach attempt (phone, email, fax, in-person); and
   c. The outcome of the outreach attempt.

8. Assisting with the coordination of care across all settings;

9. Determining timeframes for re-contact or reassessment as stated in the Delegated IPA’s program description and policies as well as determined by the health status of the Member; and

10. Ensuring the PCP and other Members of the care team are updated on the Member’s health status.

Data Sharing

A. IEHP transfers all information necessary to support continuity of care when the Member transfers to another health plan. This information includes, but is not limited to: assessment, ICP, and other pertinent information. IEHP provides the information to the Member’s new health plan no later than thirty (30) calendar days from receipt of the notice of disenrollment to IEHP and no later than the effective date of transfer in the method and format specified by the Department of Health Care Services (DHCS) and Centers for Medicare and Medicaid Services (CMS).14

B. In order to provide the information within this timeframe, Delegated IPAs must provide the Member’s ICP and ICT information to IEHP within fourteen (14) business days of IEHP’s request.

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14 DHCS DPL 17-001.
25. DELEGATION AND OVERSIGHT

C. Care Management Requirements
   3. Reporting Requirements

APPLIES TO:

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

POLICY:

A. All Delegated IPAs must report care management information to IEHP as described below on a monthly basis.

B. All reports must be submitted to IEHP within the timeframes specified in Attachment, “Medicare Provider Reporting Requirements Schedule” in Section 25 and in the correct format, via IEHP’s Secure File Transfer Protocol (SFTP). Files not submitted in the correct format will be rejected, and Delegated IPA will be required to resubmit in the required format.

C. 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 or termination or non-renewal of the IEHP Agreement.

PROCEDURES:

A. Monthly Reporting Requirements:
   1. Monthly reports are to be submitted to IEHP via the Secure File Transfer Protocol (SFTP) within the timeframes specified in the Medicare Provider Reporting Requirements Schedule regardless if it falls on a holiday or weekend (See Attachment, “Medicare Provider Reporting Requirements Schedule” in Section 25). Care Management reporting requirements include:
      a. Monthly Medicare Care Management Logs
         1) The Monthly Medicare Care Management Log (See Attachment, “Monthly Medicare Care Management Log” in Section 25) includes all Members that are in any program level of care management (i.e. care coordination, high risk, complex).
         2) Monthly report should include previously opened active cases, when there is a change in status and newly identified case(s) for the month reporting.
         3) By the 1st business day of every month, IEHP will select ten (10) cases from various data sources for monthly file review. Delegated IPAs will be provided with file selections the 1st business day of the month for submission to the SFTP by the 15th day of the month.
         4) Member care management contact is based on the needs of the Member and the plan in the Individualized Care Plan (ICP). Members who are considered high/complex risk should receive care management contact at least monthly, if not more frequently. Each Delegated IPA must submit the information noted in
25. DELEGATION AND OVERSIGHT

C. Care Management Requirements
   3. Reporting Requirements

   the Monthly Medicare Care Management Log.

   b. Monthly Care Coordination for Members Receiving Specialty Mental Health Services Log

      1) On the 1st day of each month, IEHP will provide Delegated IPA a list of their IEHP DualChoice Members known to be receiving specialty mental health services through the County Mental Health Clinics. A similar report will be sent to the County Mental Health clinics as well on a quarterly basis.

      2) IEHP will pre-schedule case conferences to take place on a quarterly basis. The Delegated IPA and County Mental Health Clinics are expected review the status of their respective Members prior to the case conference for a more productive discussion of identified Member issues. These case conferences will serve as the forum for the required county outreach as outlined in Policy 25C2, “Care Management Requirements – Delegated IPA Responsibilities.”

      3) Delegated IPAs will complete the report log by providing the data elements specific to the CA1.7 measure, as outlined in Policy 25F1, “Medicare MMP Reporting Requirements – IEHP DualChoice Cal MediConnect Plan (Medicare-Medicaid Plan)” and Attachment, “Medicare Provider Reporting Requirements Schedule” in Section 25.

   2. As described in 25D3, “Quality Management - Corrective Action Plan Requirements”, Persistent failure to submit required reports may result in the request of a CAP. Upon request, the Delegated IPA must submit a complete and comprehensive CAP to IEHP that adequately addresses all deficiencies noted. The CAP must be submitted to IEHP within thirty (30) calendar days of written notification by IEHP.

REFERENCE:

A. Medicare-Medicaid Capitated Financial Alignment Model Reporting Requirements: California-Specific Reporting Requirements, eff. 10/01/18, issued 02/28/19.

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25. DELEGATION AND OVERSIGHT

D. Quality Management
   1. Quality Management Reporting Requirements

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Independent Physicians Associations (IPA).

POLICY:

A. All IPA must report Quality Management (QM) and Quality Improvement (QI) information to IEHP as described below.

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

PROCEDURES:

A. Semi-Annual Reporting Requirements:
   1. Reporting requirements include a QM semi-annual assessment, which documents the progress of the QM, QI and Utilization Management (UM) activities found in the QM Work Plan.
      a. Quality Management – Reports must include the following:
         1) Quality of Clinical Care;
         2) Quality of Service;
         3) Safety of Clinical Care;
         4) Member Experience
         5) Program Scope;
         6) Yearly Objectives;
         7) Yearly Planned Activities;
         8) Timeframe within which each activity is to be achieved;
         9) Staff member(s) responsible for each activity;
         10) Monitoring of previously identified issues; and
         11) Evaluation of the QM/QI program.
   2. QM Semi-Annual Reports must be submitted via IEHP’s Secure File Transfer Protocol (SFTP) by these due dates, regardless of whether these dates fall on a weekend or holiday:
      a. 1st Semi-Annual: August 15th, and
25. DELEGATION AND OVERSIGHT

D. Quality Management

1. Quality Management Reporting Requirements

b. 2nd Semi-Annual: February 15th.

3. The reporting periods for each report are as follows:
   a. 1st Semi-Annual: January 1st through June 30th of the reporting year; and
   b. 2nd Semi-Annual: July 1st through December 31st of the reporting year.

B. Annual Reporting Requirements: The following reports must be submitted annually to IEHP via IEHP’s SFTP by the 15th of February each calendar year regardless of whether this date falls on a weekend or holiday:

1. Quality Management

   a. Quality Management Program Description: Reassessment of the QM Program Description must be done on an annual basis by the QM Committee and reported to IEHP. The following must be included with the submission to IEHP:

      1) Any changes made to the QM Program Description during the past year or intended changes identified during the annual evaluation; and
      2) Signature page noting date of committee approval.

   b. Quality Management Work Plan: Submit an outline of planned activities for the coming year, including timelines, responsible person(s) and committee(s). The Work Plan should include planned audits, follow-up activities and interventions related to identified problem areas.

   c. Quality Management Program Annual Evaluation: The evaluation should include a description, trending, barrier analysis and evaluation of the overall effectiveness of the QM Program.

C. IEHP’s Quality Management Department monitoring and oversight duties include:

1. Review all monthly, semi-annual and annual Delegated IPA reports for tracking and trending levels of activity; comparison to other Delegated IPA, variances compared to other Delegated IPA and other significant data issues. Reports include those listed above.

2. Review and approve the Semi-annual and annual reports submitted by the Delegated IPAs (e.g., QM Program Description and Work Plan).

3. Review all grievances received by IEHP for Delegated IPAs. The review includes assessment of grievance rates and response timeliness, examination for trends, significant changes in volume or amount of grievances received, quality issues, or other significant findings. Any trends or discrepancies in reported information are addressed with the Delegated IPAs in accordance with Policy 25D2, “Delegated IPA Quality Management Program Structure Requirements”.

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Medicare DualChoice
25.  DELEGATION AND OVERSIGHT

D.  Quality Management
    1.  Quality Management Reporting Requirements

REFERENCE:

A.  Coordinated Care Initiative (CCI) Three-Way Contract, Section 2.2 eff January 1st, 2018.
25. DELEGATION AND OVERSIGHT

D. Quality Management

2. Delegated IPA Quality Management Program Structure Requirements

APPLIES TO:

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

POLICY:

A. IEHP is responsible for conducting the Health Plan Quality Management (QM) Program. IEHP and its Delegates are required to have certain QM structural components as noted below:

1. All Delegates must have a written QM Program Description, QM Work Plan, Annual Evaluation and related QM Policies and Procedures.

2. The Delegate’s QM Program Description outlines the structure and content of the Delegate’s QM Program, including the QM Committee and related activities.

3. All Delegates’ QM Program activities must meet Department of Health Care Services (DHCS), Centers for Medicare and Medicaid Services (CMS), National Committee for Quality Assurance (NCQA), and IEHP standards.

4. The Delegate’s QM Committee is responsible for oversight and annual approval of the Delegate’s QM Program Description, Work Plan and Annual Evaluation.

5. The Delegates’ QM Committees are responsible for monitoring, measuring, and evaluating the quality, effectiveness, safety, coordination and appropriateness of the care provided by Practitioners to Members for the purpose of continued quality improvement.

6. The Delegates must have adequate QM staffing to support QM Program and related activities.

7. QM Programs must be accountable to the Delegates’ QM Committees.

B. IEHP monitors Delegates’ QM Program Structure and implementation of quality management activities through the Delegate’s semi-annual reports and the annual delegation oversight audit (DOA). The DOA audit tool is based upon current NCQA, CMS, DHCS, and IEHP standards.

DEFINITION:

A. Delegate - A medical group, Health Plan, Delegated IPA, or any contracted organization delegated to provide services.

PROCEDURES:
25. DELEGATION AND OVERSIGHT

D. Quality Management

2. Delegated IPA Quality Management Program Structure Requirements

A. Responsibilities – IEHP has adopted a health care delivery structure that includes QM Program activities required of contracted Delegates. Details are noted in both the Agreement between IEHP and Providers and the IEHP Provider Policy and Procedure Manual. Activities related to medical services include:

1. Quality Management:

   a. Quality Structure – IEHP is responsible for conducting the Health Plan QM Program. Delegates are also required to have a structure in place that monitors quality activities, including a formal Committee structure and sufficient personnel in place to perform quality management activities.

   b. Quality Studies – IEHP is responsible for performing quality studies to maintain compliance with CMS, DHCS, NCQA requirements, and IEHP standards. In addition, Delegates are required to perform a minimum of two (2) quality studies for their Membership per calendar year. One (1) study must be in the area of access; the other study should be an area pertinent to the Delegate, IEHP Membership served by the Delegate, and quality issues identified by the Delegate. Study results must be made available to Primary Care Physicians (PCPs) and IEHP Members upon request. IEHP has the right to mandate the type of access study required if the Plan has identified quality or access issues.

   c. Peer Review – Delegates must perform peer review. All Delegates are required to have a Peer Review Committee made up of Physicians and representatives of the network that provides peer review of any Practitioner noted to have potential quality issues. The Delegates’ Peer Review Committees are responsible for reviewing Provider, Member, or Practitioner grievances and/or appeals, Practitioner-related quality issues and other peer review matters. In addition, the Committee performs oversight of the Credentialing Program and activities, grievance and appeals processes with recommendations for modification as necessary. Data utilized to identify candidates for peer review include quality studies by IEHP or the Delegate, grievances received by the Delegate or IEHP, utilization and/or encounter data, and other data sources.

   d. Clinical Data – IEHP is responsible for providing Member experience and clinical performance data to all Delegates in order for them to conduct quality studies and perform all delegated functions. This data will be provided upon request from the Delegate or as both parties agree to specific quality studies where IEHP has the necessary data. In addition, all Delegates are free to collect their own clinical and service data to support Quality Improvement (QI) initiatives.

2. Utilization Management (UM) – IEHP delegates the utilization management process to those Delegates that have sufficient administrative capacity with accompanying
25. DELEGATION AND OVERSIGHT

D. Quality Management

2. Delegated IPA Quality Management Program Structure

Requirements

policies and procedures to meet all IEHP, DHCS, CMS and NCQA standards for utilization management activities. Refer to Section 14, “Utilization Management,” for more information.

3. Credentialing/Recredentialing - Delegates may be delegated the responsibility for credentialing and recredentialing of participating Practitioners, as identified in Section 25, “Delegation and Oversight.” This includes a signed attestation by the Delegate’s Medical Director that states all Practitioner-required reviews were conducted. IEHP’s Chief Medical Officer and/or Medical Director designee review all Practitioners (PCPs and Specialists) individually for quality-related issues prior to assignment of Members. The IEHP Peer Review Subcommittee performs peer review for Practitioners on Providers identified through the Ongoing Monitoring of Sanctions process conducted by Credentialing and those Practitioners referred by the Chief Medical Officer or Medical Director for potential quality of care concerns. IEHP also performs Credentialing/Recredentialing functions for those Practitioners that are directly contracted with IEHP.

4. Care Management (CM) – Delegates have been delegated care management responsibilities for Members including case finding, assessment of needs and care coordination, referral to outside agencies, and all other necessary CM activities. Refer to Policy 25C2, “Care Management Requirements – Delegated IPA Responsibilities,” for more information.

5. Practitioner Education – Delegates and IEHP share Provider education and training responsibilities including orientation to IEHP DualChoice line of business, delineation of IEHP policies and procedures pertinent to the Practitioner, site and medical record audit preparation, specialized support and training such as preventive services and health education. IEHP provides network wide training on a variety of subjects including preventive services, IEHP policies and procedures, case management, and health education.

Delegates are also required to be aware and require their Practitioners’ use of certain forms, supplied by IEHP on the Provider website, to their Practitioners including: Perinatal Risk Assessment Forms, Individual Health Education Behavioral Assessment (IHEBA) forms, etc. IEHP forms are available online at www.iehp.org.

6. Health Education – IEHP actively works to improve the health and welfare of Members. Those Members with chronic conditions are identified through pharmacy data, referral information, and other reporting measures. IEHP notifies the Delegate’s CM department for the purpose of individualized care management and referral to appropriate health education programs. IEHP works collaboratively with Providers and Practitioners to identify and educate these Members. IEHP provides certain network-wide health education programs to all Members. IEHP supplies Delegates and PCPs
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with health education brochures, materials, forms and a Provider Resource Directory. Refer to Section 15, “Health Education” for more information.

7. Medical Records Maintenance – IEHP is responsible for establishing and distributing medical record standards to Providers and Practitioners. Delegates are required to monitor Physician offices for compliance. Practitioners are required to maintain policies and procedures consistent with IEHP requirements. These requirements are outlined in Policy 7A, “Provider and Delegated IPA Medical Records Requirements.”

8. Preventive Care and Non-Preventive Care Guidelines – Practice guidelines are developed by IEHP using current published literature, current practice standards, and expert opinions. They are based upon specific medical issues commonly found within IEHP’s Membership. Delegates are expected to monitor Practitioner’s care related to clinical guidelines as applicable. IEHP measures its performance against at least four (4) of its standards on an annual basis, two (2) of which relates to Behavioral Health. Standards are reviewed and updated by IEHP at least every two (2) years, or earlier, if necessary.

9. Access Standards – Delegates are required to adhere to IEHP standards for availability and accessibility of services. Refer to Section 9, “Access Standards” for more information. IEHP ensures the standards for appointment availability, after-hours access, Practitioner wait time, Physician site hours, emergency service availability, medical triage both during and after hours, proximity of Specialists and Hospitals, and follow-up care through studies and audits. The Delegate is required to perform access studies on their Practitioners to ensure they meet IEHP requirements.

B. Assessment and Monitoring: To ensure that Delegates have the capacity and capability to perform required functions, IEHP has a rigorous pre-contractual and ongoing assessment and monitoring system. Details of these activities with standards, tools and processes are found in the Provider Services policies.

1. Pre-Delegation Audit – IEHP performs pre-delegation audits to newly Delegated IPAs to evaluate the Delegate’s capacity to meet regulatory requirements within twelve (12) months prior to implementing delegation using an audit tool that reflects current NCQA, DHCS, and IEHP standards.


C. Delegate QM Reporting Requirements: Delegates are required to report the following information on a periodic basis. Policy 25D1, “Quality Management - Quality Management Reporting Requirements,” specifies the reporting requirements.

1. QM Program Description - copy of the annual, updated program description;
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2. QM Work Plan - copy of the annual work plan, that includes responsible person and anticipated completion date for activities;

3. QM Semi-Annual Reports of quality improvement activities;

4. Quality Studies performed by the Delegate; and

5. QM Program Annual Evaluation - annual assessment of Delegate’s QM Program and related activities.

D. Annual Quality Management Program Description

1. Contracted Delegates must have a written Annual QM Program Description that describes the structure of the Delegate’s Quality Program. This program must include the following:
   a. QM Program goals, objectives, and structure;
   b. Accountability to the Delegate’s Governing Body;
   c. Designated Physician involvement in the QM program;
   d. Patient Safety;
   e. Member Experience
   f. Description of behavioral health care activities, as applicable;
   g. Description of behavioral health care Practitioner involvement in behavioral health care aspects of the program; as applicable;
   h. Description of QM Committee oversight of quality management functions;
   i. Role, structure and function of the QM Committee and related Sub-committees including meeting frequency;
   j. An annual work plan;
   k. Description of the resources that devote time to meeting the objectives of the QM Program;
   l. Objectives for serving a culturally and linguistically diverse membership; and
   m. Objectives for serving Members with complex health needs and Seniors and Persons with Disabilities (SPD).

2. The Delegate’s Annual QM Program Description must be evaluated annually and updated as necessary by the Delegate’s QM Committee. The Annual QM Program Evaluation must include a description, trending, analysis, and evaluation of the overall effectiveness of the Delegate’s QM Program. The Annual QM Program Evaluation
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must be submitted to IEHP via IEHP’s Secure File Transfer Protocol (SFTP) no later than February for each calendar year.

3. The Delegate must have a written description for the staff dedicated to perform the activities defined in the QM Program.

4. The Delegate must document all resources devoted to the QM Program, not merely the QM Program staff, but also the planned number and type of quality management activities. There must be documentation of the resources regularly devoted to specific quality management activities and if the Delegate is completing quality management activities in a competent and timely manner. These resources include but are not limited to the following:

a. Employees;

b. Consultants;

c. Data sources; and

d. Analytic resources such as statistical persons and/or programs.

5. The Delegate must have access to, and the ability to manage, the data supporting measurement of quality management activities documented in the QM Work Plan.

6. The Delegate’s Board of Directors is responsible for the QM Program Structure. There must be documentation of this responsibility in the Annual QM Program Description.

7. There must be evidence of the Board of Directors’ review and approval of the Annual QM Program Description on an annual basis.

8. The Delegate’s Annual QM Program Description must be submitted to IEHP via IEHP’s SFTP for final approval from the QM department. This submission must be received by IEHP no later than the February for each calendar year.

9. The Delegate’s Annual QM Program Description must outline their approach to address the cultural and linguistic needs of its membership.

10. The Delegate’s Annual QM Program Description must outline their approach to address Members with complex needs. Members with complex needs can include individuals with physical or developmental disabilities, multiple chronic conditions, and severe mental illness.

E. **Quality Management Committee**

1. The QM Committee is an interdisciplinary committee with participation from the Delegate’s appointed Practitioners who represent network Physicians. The QM Committee is responsible for developing, implementing, monitoring and overseeing the activities in the QM Program.
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2. The Delegate’s description of the QM Committee must include the following:
   a. Role;
   b. Function;
   c. Structure that includes organizational structure and reporting responsibility;
   d. Membership;
   e. Terms of service;
   f. Voting rights;
   g. Quorum definition;
   h. Meeting frequency;
   i. Minute format and storage; and
   j. Committees associated with oversight of delegated activities.

3. The Delegate’s description of the QM Committee must include how the following actions are performed:
   a. Recommending policy decisions;
   b. Analyzing and evaluating QM Activity findings;
   c. Ensuring Practitioners’ participation in the QM Program through planning, design and implementation or review;
   d. Implementing needed actions;
   e. Ensuring needed follow-up; and
   f. Maintain signed and dated meeting minutes.

4. The Delegate’s QM Committee must meet at least quarterly and follow a prescribed agenda.

5. The Delegate’s QM Committee discussions, conclusions, recommendations, and actions must be documented in the signed Committee minutes.

6. The Delegate’s QM Committee is responsible for monitoring, measuring, and evaluating the effectiveness of care provided to its Members.

F. Quality Management Work Plan

1. The QM Work Plan must be a separate document included in the Annual QM Program Description. The Work Plan must document the QM activities scheduled for the calendar year with a brief explanation of timing and party responsible for the activity. The Work Plan must include the following:
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   a. Objectives for the year;
   b. Quality of clinical care;
   c. Quality of service;
   d. Safety of clinical care;
   e. Program scope;
   f. Activities planned for the year, including the quality and safety of clinical care and quality of service;
   g. Time frame within which each activity is to be completed;
   h. Person responsible for each activity;
   i. Planned monitoring of previously identified issues; and
   j. Planned evaluation of the QM Program.

2. The Work Plan must be submitted to IEHP via IEHP’s SFTP by the February for each calendar year.

G. **Quality Management Semi-Annual Reports**

1. The Delegate’s QM Semi-Annual Reports document the progress of the QM activities found in the QM Work Plan.

2. The QM Semi-Annual Reports assist the Delegate in its development of the QM annual assessment.

3. The QM Semi-Annual Report must include:

   a. Component/Activity;
      1) Clinical Improvement;
      2) Continuity and Coordination of Care;
         • General Medical Care
         • General Medical and Behavioral Health
      3) Access;
      4) Satisfaction Improvement;
      5) Patient Safety; and
      6) Other QI Activities.

   b. Each Component must include:
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1) Objectives;
2) Activities planned;
3) Responsible person for each activity; and
4) Timeframe within each activity is to be completed.

c. Semi-Annually the Delegate must include a description of the following areas for each separate component:

1) Reporting Period;
2) Key findings;
3) Interventions taken;
4) Analysis of findings along with progress; and
5) Any follow-up actions.

4. QM Semi-Annual Reports must be submitted to IEHP via IEHP’s SFTP on the following dates:
   a. 1st Semi-Annual report covers period from January 1st to June 30th and must be reported to IEHP by August 15th.
   b. 2nd Semi-Annual report covers period from July 1st to December 31st and must be reported to IEHP by February 15th.

H. Quality Management Program Annual Evaluation:

1. The QM Annual Evaluation may be included on the QM Work Plan or in a separate document. The Annual Evaluation must evaluate the Delegate’s performance on planned QM Activities described in its QM Program Description and Work Plan, including all delegated activities. The Annual Evaluation must include the following:

   a. A description of completed and ongoing QM and QI activities that address quality and safety of clinical care and quality of service;
   b. Trending of measures to assess performance in the quality and safety of clinical care and quality of service;
   c. Analysis of the results of QM and QI initiatives, including barrier analysis; and
   d. Evaluation of the overall effectiveness of the QM Program, including progress toward safe clinical practices.

I. Continuity and Coordination of Care: IEHP delegates care management and coordination of care activities to contracted Delegates. CM requirements are delineated in Section 12, “Coordination of Care.”
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J. **Confidentiality:** Providers are required to restrict Member medical records access to those Practitioners and associated staff with a legitimate reason to view the files. Records must be maintained in a protective and confidential manner and not be readily accessible to unauthorized persons or visible to the general public. Providers and Practitioners must maintain procedures to ensure appropriate records processing to prevent breach of confidentiality.

1. **Medical Records Release** – Medical records contain confidential information that must not be released to any party other than the PCP without the expressed written consent of the Member or legal representative. The PCP must maintain procedures for obtaining such written consent prior to release of records copies. Refer to Policy 7B, “Information Disclosure and Confidentiality of Medical Records,” for more information.

2. **Members’ Right to Confidentiality** – Members have the right to confidentiality of medical information. All Provider contracts and subcontracts include the provision to safeguard the confidentiality of Member health records and treatment in accordance with applicable state and federal laws. Release of Member medical information may be necessary to protect the health of the Member and/or for coordination of services between Practitioners, Specialists, or other health care Providers of service. Refer to Policy 7B, “Information Disclosure and Confidentiality of Medical Records,” for more information.

3. **Education of PCP Staff Regarding Confidentiality Issues** – Providers must educate Physicians and associated staff regarding confidentiality issues. Signed confidentiality statements are required for participation in the IEHP Practitioner network and monitored as part of the facility review process. Referral or access to sensitive services requires the maintenance of high standards of confidentiality. Members requiring family planning services, treatment for sexually transmitted diseases, abortion information and/or treatment, and Human Immunodeficiency Virus (HIV) testing or are requesting assistance with highly sensitive issues, must be treated with respect and consideration for confidentiality.

4. **Conflict of Interest** – Delegates are required to perform Peer Review within their organization. Should a significant practitioner problem or quality issue arise that cannot be resolved at this level; Delegates’ QM Committees may refer the issue to the IEHP Peer Review Subcommittee for resolution. Should an issue arise involving care provided by a Physician member of the QM Committee or any Subcommittee, that Physician is replaced by a substitute until the issue is resolved. The Member involved in the issue has all rights normally given to anyone with a case presented to the Committee or Subcommittee. IEHP Committee members are required to sign a confidentiality and conflict of interest statement.
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5. Confidentiality Policy – IEHP retains oversight for Provider confidentiality procedures through the IEHP QM Committee and Peer Review Subcommittee. As a condition of participation in the IEHP network, all contracted and subcontracted Providers retain signed confidentiality forms for all staff and provide education regarding policies and procedures for maintaining the confidentiality of IEHP Members.

6. Provider Confidentiality Procedures – Delegates must have policies and procedures for maintaining the confidentiality of Members.


K. Provider Participation:

1. Provider Information – Delegates are required to inform network Practitioners of guidelines, policy and procedure changes, and other important information. Delegate methods of Practitioner education or notification are evaluated annually during Delegation Oversight Audits performed by IEHP Health Services staff. Practitioners are informed through the IEHP Provider Newsletter, letters, memorandums, distribution of updates to the Provider Manual, and training sessions. Delegates are notified through letters, memorandums, Provider Manual updates, training sessions for specific issues, Joint Operations Meetings, and by attending IEHP University, when available.

2. Provider Cooperation: IEHP requires that Delegates and Hospitals cooperate with IEHP QM Program studies, audits, monitoring, and quality related activities. Requirements for cooperation are included in Hospital and Delegate Provider contract language that describes contractual agreements for access to information.

L. Delegate and Hospital Contracts – The IEHP Capitated and Per Diem Agreements contain language that designates access for IEHP to perform monitoring, and require compliance with IEHP QM Program activities, standards, and review system.

1. Provider Agreements include the following provisions:

a. Delegate is subject to, and agrees to participate in the IEHP QM Program, with regular IEHP monitoring and evaluation of compliance with QM Program standards and IEHP policies and procedures, including participation in Member grievance and/or appeal resolution.

b. Delegate shall provide access at reasonable times, upon demand by IEHP, to inspect facilities, equipment, books and records including Member patient records, financial records pertaining to the cost of operations and income received by Delegate for medical services rendered to Members. Delegate shall ensure that Providers allow IEHP to access and use Provider performance data.
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c. Delegate shall cooperate with IEHP’s QM Program and, upon reasonable request, shall provide IEHP with summaries of or access to records maintained by Delegate and required in connection with such programs, subject to applicable state and federal law concerning the confidentiality of medical records.

d. Delegate shall not impede open Practitioner-patient communication. Members are allowed to participate with doctors in decision-making about their own health care including the ability to talk with their doctor about their medical condition regardless of cost or benefit.

2. Hospital contracts include provisions for the following:

a. Hospital agrees to participate with IEHP in the IEHP QM Program, with regular IEHP monitoring and evaluation of compliance with QM Program standards and IEHP policies and procedures, including participation in Member grievances and resolution. Hospital shall also provide access to IEHP utilization review and case management personnel for the purpose of conducting concurrent review and case management on Members who are receiving Hospital services.

b. Hospital shall implement an ongoing QM Program and shall develop procedures for ensuring that the quality of care provided by Hospital conforms with generally accepted Hospital practices prevailing in the managed care industry. Hospital shall develop written procedures for remedial action whenever, as determined by the QM Program, inappropriate or substandard services have been furnished, or services that should have been furnished have not been furnished.

c. Hospital shall provide access at reasonable times, upon demand by IEHP, to inspect facilities, equipment, books and records including Member patient records and financial records pertaining to the cost of operations and income received by Hospital with a five (5) working day prior written notice of any such inspection. Hospital shall ensure that Providers allow IEHP to access and use Provider performance data.

d. Hospital shall cooperate with IEHP’s QM Program and, upon reasonable request, provide IEHP with summaries of or access to records maintained by Hospital and required in connection with such programs, subject to applicable state and federal law concerning the confidentiality of medical records.

M. Auditing and Monitoring Activities: IEHP performs a series of activities to monitor Delegate functions including the following:

1. Delegation Oversight Audit – IEHP performs an annual Delegation Oversight Audit of all contracted Delegates using an audit tool that is based upon current DHCS, NCQA, CMS, and IEHP standards. This audit assesses Delegate’s operational capabilities in
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the areas of QM, QI, Credentialing, UM, CM, and Compliance. Refer to Policy 25A2, “Delegation Oversight – Audit,” for more information.

2. Joint Operations Meetings (JOMs) - JOMs are intended to provide a forum to discuss issues and ideas concerning care for Members. They allow IEHP a method of monitoring plan administration responsibilities that the Delegates are required to perform. JOMs may address specific UM, QM, QI, CM, grievance, study results, or any other pertinent quality issues. They are held with Delegates. These meetings are designed to address issues from an operational level.

3. Member or Practitioner Grievance Review: IEHP performs review, tracking, and trending of Member or Practitioner grievances and appeals. IEHP reviews individual grievances and their resolutions for Delegate policies or procedures, actions, or behaviors that could potentially negatively impact health care delivery or Member health status.

4. Specified Audits: IEHP performs specific audits of Delegates and PCPs to assess compliance with IEHP standards. These audits include facility reviews, claims audits, CM audits, and health education audits.

5. Focused Audits: IEHP performs focused audits of Delegates or Practitioners as indicated whenever a quality or clinical issue is identified.

6. Review of Referral Universes: All Delegates are required to submit monthly referral universes to IEHP listing all approvals, denials and partial approvals (modifications) of referrals or services from the previous month. In addition, Delegates are required to submit copies of all denial letters sent to Members. All denials are reviewed for appropriateness and trends or patterns of concern. Refer to Policy 25E1, “Utilization Management – Delegation and Monitoring” for more information.

7. Review of CM Logs: All Delegates are required to submit monthly CM Logs to IEHP listing all CM cases from the previous month. In addition, Delegates are required to submit copies of CM files. All files are reviewed for appropriateness and trends or patterns of concern. Refer to Policy 25C1, “Care Management Requirements – IEHP Monitoring and Oversight” for more information.

8. Delegated Reporting Requirements Review: IEHP performs review of scheduled submitted reports as defined in the Provider Reporting Requirements Schedule (See attachment, “Medicare Provider Reporting Requirements Schedule” in Section 25 and delegated activities as defined in the Delegation Agreement in Section 25).

9. Focused Referral and Denial Audits: IEHP performs focused audits of the referral and denial process for Delegates when quality of care issues are identified. Audits examine source data at the Delegate to review referral process timelines, appropriateness of denials and the denial process, including denial letters. Refer to
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10. Member and Physician Satisfaction Surveys: IEHP performs Member and Physician satisfaction surveys to assess their satisfaction with IEHP, their Delegate and managed care.

O. Delegates that are significantly out of compliance with QM requirements receive letters requesting a Corrective Action Plan (CAP). Persistent non-compliance, or failure to adequately address or explain discrepancies identified through oversight activities, may result in freezing of new Member enrollment, termination or non-renewal of the Agreement with IEHP.

REFERENCES:

A. Title 28, California Code of Regulations §1300.70(b)(2).

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3. Corrective Action Plan Requirements

APPLIES TO:

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

POLICY:

A. IEHP’s Quality Management (QM) Department is responsible for the oversight, monitoring and tracking of all assessments and Corrective Action Plans (CAPs), including but not limited to: Facility Site Review (FSR) and Medical Record Review (MRR) Surveys, Focused Audits, or as determined by the Delegation Oversight Committee.

B. Provider Services Delegation Oversight is responsible for oversight of required Delegates reporting, Clinical Audits and the Annual Delegation Oversight Audits (DOAs), or audits as determined by the Delegation Oversight Committee.

C. IEHP monitors Primary Care Physician (PCP) compliance against pertinent IEHP, Centers for Medicare and Medicaid Services (CMS), and National Committee for Quality Assurance (NCQA) requirements through FSR and Medical MRR Surveys.

D. IEHP may choose whether to delegate site review responsibilities to another Managed Care Plan.

E. The CAP Process addresses deficiencies found during the FSR and/or MRR and provides guidance for PCPs to bring their site into full compliance with regulatory standards.

F. All PCPs are responsible for developing and submitting their CAPs directly to IEHP.

G. IEHP monitors the Delegates and IEHP Health Plans Quality Management (QM), Utilization Management (UM), Care Management (CM), Compliance, and Credentialing program structure and implementation of policies through the annual Delegation Oversight Audits. These audits are performed using current NCQA, CMS, and IEHP standards. IEHP also monitors these areas through the Delegate’s monthly, quarterly, semi-annual and annual report submissions which are presented to the Delegation Oversight Committee.

H. CAPs are also required to remediate deficiencies identified during monthly review of required reporting and file reviews, focused and/or clinical audits, and the annual Delegation Oversight Audits (DOA).

DEFINITION:

A. Delegate is defined as an organization authorized to perform certain functions on IEHP’s behalf.

PROCEDURES
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3. Corrective Action Plan Requirements

Facility Site Review and Medical Record Review Survey CAP

A. Deficiencies that are identified through the combined FSR and MRR Survey resulting in an audit score below 90% or above 90% with deficiencies in the nine (9) critical elements, pharmacy and/or infection control sections, require a CAP. MRR Surveys scoring below 90%, or above 90% with one (1) or more individual sections scoring below 80%, also require a CAP. A CAP may also be required at the discretion of the Certified Site Reviewer (CSR), Designated Plan Trainer (DPT), or Master Trainer (MT). Refer to Policy 6A, “Facility Site Review and Medical Record Review Survey Requirements and Monitoring”.

B. The CAP is a standardized, pre-formatted document developed to assist the PCP in meeting IEHP requirements. This CAP includes deficiencies noted during the PCP Facility Site Review and Medical Record Review, specified corrective actions, their evidence of corrections, date corrections were implemented, Physician or designee responsible for corrective actions, and the name and title of the CSR. In addition, there is a section for IEHP’s verification of corrections. The CAP contains three (3) separate sections: Facility Site Review Survey; Critical Elements Survey; and Medical Record Review Survey.

The CAP includes Disclosure and Release statements regarding CAP submission timeline and authorization to furnish results of the reviews and corrective actions to Health Plans participating in the collaboration, government agencies that have authority over the Health Plans, and authorized county entities in the State of California. The CAP informs the PCP that Health Plans participating in the collaborative for FSR and MRR Surveys may agree to accept the survey findings and to furnish each other with surveys and CAP. The collaborative process does not supersede any contractual requirement and participation is voluntary.

C. CAP Process

1. The entire CAP process must be completed within one hundred twenty (120) calendar days from the date of the audit and CAP notification, as follows:
   a. Provider has forty-five (45) days to resubmit a corrective action plan to IEHP.
   b. IEHP has forty-five (45) days to review and accept the CAP and/or complete a verification site visit.
   c. If the site continues to have deficiencies, an additional thirty (30) days may be given for the PCP to address all issues and IEHP to review and accept the CAP or perform a verification site visit.

2. CSRs perform focused audits within six (6) months on any PCP with persistent issues. If the deficiencies are not corrected at the time of the focused audit, the CAP process begins again. The site is also placed on annual review requiring a full survey which includes both the FSR and MRR.
3. IEHP CSR evaluates the FSR and MRR findings and documents deficiencies on the review tool and CAP. IEHP provides a survey findings report and a formal written request for corrections of all (i.e. critical and/or non-critical) deficiencies to Providers.

4. Upon completion of the review, the IEHP CSR discusses the findings and the required corrective actions with the PCP or designee as follows:
   a. The PCP must submit a CAP that includes implementation dates and evidence of corrections to IEHP within forty-five (45) calendar days from the date of the survey;
   b. The critical element deficiencies must be addressed with CAP submitted to IEHP within ten (10) business days of the survey date with evidence of correction(s) approved by IEHP. If evidence does not support the corrective action(s) taken, IEHP will verify corrections within thirty (30) calendar days;
   c. The survey findings and CAP information are shared with collaborative Health Plans, if applicable; and
   d. The CSR explains that the PCP/designee signature acknowledges receipt of the CAP and agreement to comply with designated timeframes.

5. The PCP should note corrections on the CAP as follows:
   a. Document the corrective actions taken in the “Corrective Action Taken” column;
   b. Document the date the correction was implemented. PCP may document additional steps taken in this column;
   c. Initial the appropriate column on the CAP (by person responsible for corrective actions); and
   d. Attach evidence of correction(s) (e.g. in-service sign-in sheet and agenda, invoices, forms, used, etc.).

6. FSR CAPs: CAP verification may be accomplished by PCP submission of appropriate evidence of corrections (e.g. invoices for receipt of safety needles). CAP verification may require an onsite visit within forty-five (45) calendar days from receipt of the CAP if evidence of corrections is insufficient or deficiency cannot be verified in writing.

7. MRR Survey CAPs: Follow-up action is scheduled at the discretion of IEHP and may include the following within forty-five (45) days of receipt of the CAP:
   a. Score < 80%: Onsite visit to verify processes have been implemented;
   b. Score 80-89%: Accept documented CAP and/or a CAP verification visit or follow-up record review may be requested at the discretion of IEHP; or
   c. Score 90-100%: Exempted Pass without CAP required; however, CAP and CAP Verification may be requested at the discretion of IEHP for any individual section that scores below 80% on the Medical Record Review.
8. Critical Element CAPs: At the time of the survey, CSRs notify PCPs of critical element deficiencies, or other deficiencies determined by IEHP to require immediate corrective action, and the CAP requirements for these deficiencies. Within ten (10) business days of the survey date PCPs must submit to IEHP a completed CAP with verification for all critical elements and/or other survey deficiencies requiring immediate correction.

9. Any site unable to complete actions required for a CAP for the original survey, or any PCP that scores less than 80% on the FSR and/or MRR is placed on a twelve (12) month monitoring at which time a full resurvey, including FSR and MRR, is performed.

10. New Members are not assigned to PCPs that score below 80%. If the corrections are appropriately made and the CAP is closed, the PCP remains in the network and new Member assignments resumes.

11. Communication to Participating Health Plans: IEHP monitors the CAP until completion. Information regarding PCPs showing no improvement and/or non-compliance to the CAP within the defined Medi-Cal Managed Care Division (MMCD) timeframes is communicated to the collaborative Health Plans.

12. IEHP notifies all Managed Care Health Plan collaborative partners of PCP scores below 80% within three (3) business days from the audit.

D. Pre-contractual PCP Surveys and CAPs

1. New sites that are noted to have deficiencies in Critical Elements, regardless of the overall score, are not eligible to receive Membership until the Critical Element CAPs are submitted and accepted by IEHP.

2. New sites scoring below 80% are not accepted into the PCP network but may request reconsideration of this decision by the IEHP Chief Medical Officer or designee.
   a. PCPs wishing to request reconsideration of an FSR and/or MRR must do so in writing to the IEHP Chief Medical Officer within fourteen (14) working days of the date of the notification letter.
   b. After receiving a written appeal, the IEHP Chief Medical Officer or designee responds to the appealing PCP in writing noting the status of the request within thirty (30) calendar days.
   c. If the request reconsideration is approved by IEHP, the PCP has thirty (30) calendar days to submit a CAP addressing all deficiencies noted in the FSR and MRR.
   d. If the CAP is approved by IEHP, a re-assessment is scheduled within thirty (30) days. If upon re-assessment the site and/or medical record score is less than 80%, it is considered a “failed site” and is not approved as a participating site with IEHP.

3. Providers who do not pass the initial FSR may correct deficiencies, reapply to IEHP, and be re-surveyed after twelve (12) months.
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4. Any PCP whose site review reveals significant quality of care issues is not eligible for initial participation in the IEHP network, pending the outcome of a review by the IEHP Chief Medical Officer or designee, and possible further review by the IEHP Peer Review Subcommittee.

E. PCP Non-compliance for CAP Completion

1. If a PCP submits a CAP but continues to be non-compliant with the completion of CAP process after one hundred and twenty (120) calendar days, the PCP is frozen to auto assignment until such time as the corrections are verified and the CAP is closed.

   a. Delayed CAP submission process:

      1) If the CAP for the critical element was not completed and submitted within ten (10) business days from the date of the review, a reminder phone call is made to the PCP. Failure to submit required documentation within seventy-two (72) hours of the reminder call results in the freezing of Member assignment.

      2) CAP deficiencies other than critical elements should be received within forty-five (45) calendar days from the date of the request.

         • If a CAP is not received within forty-five (45) calendar days of the request, a concerted effort of communication to the PCP. If the CAP is not received within five (5) business days, IEHP notifies the collaborative Health Plans. Each Health Plan follows internal escalation procedures.

         • Providers who do not correct survey deficiencies within established CAP timelines are not assigned new Members until such time as corrections are verified and the CAP is closed. Any network Provider who does not meet compliance with survey criteria within one hundred and twenty (120) calendar days is administratively removed from the network.

         • Sites scoring below 80% in either the FSR or MRR for two (2) consecutive reviews will receive a non-compliance notification letter and must score a minimum of 80% in the next site review in both the FSR and MRR or will be administratively terminated from the IEHP Network. IEHP shall notify affected Members thirty (30) calendar days prior to the non-compliant Provider termination from the network. Plan Members shall be appropriately reassigned to other network Providers.

         • IEHP tracks the CAP process and may contact its collaborative partners with a mutual contract to meet with the PCP to review deficiencies and to make joint efforts to bring the PCP into compliance with MMCD requirements.
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- PCP failure to submit a CAP within the established CAP timelines requires IEHP to notify its collaborative partners for submission to their appropriate committee for review and action.

- Providers who do not correct survey deficiencies within established CAP timelines are not assigned new Members until such time as corrections are verified and the CAP is closed.

- Provider sites that score below 80% in either the FSR and/or MRR for two (2) consecutive reviews must score a minimum of 80% in the next site review in both the FSR and/or MRR. Sites that continually score under 80% in both the FSR and/or MRR may be removed from the network. Providers that receive two (2) consecutive non-passing scores (under 80%) will be sent a non-compliance notification letter and are at risk for administrative termination from the IEHP Provider Network. IEHP shall notify affected Members thirty (30) calendar days prior to the non-compliant Provider termination from the Network. Plan Members are appropriately reassigned to other network Providers.

F. Providers administratively terminated from the IEHP network shall have the right to appeal the decision with the health plan. IEHP has a formal and fair process to resolve grievances and complaints submitted by Providers of medical services. If verified evidence of corrections is accepted by IEHP and the decision is reversed, IEHP shall repeat the facility survey or accept the current survey and CAP as completed and place the PCP site on intensive review for twelve (12) months and shall re-survey the site at the end of twelve (12) months from the last survey. The Provider must receive 80% on the surveys. If the appeal decision is not reversed by IEHP, the Provider may re-apply through the application process.

G. IEHP monitors all sites for subsequent deficiencies through review of grievances, information from quality improvement activities, and through internal and external sources such as public health.

Delegation Oversight Audit

A. IEHP monitors Delegate’s compliance with IEHP, CMS and NCQA requirements through its annual Delegation Oversight Audits, which includes oversight for QM, UM, Credentialing, Compliance, and Care Management. These audits are performed using current NCQA, IEHP and CMS standards (when applicable). Refer to Policy 25A2, “Delegation Oversight – Audit”.

B. IEHP uses the IEHP Delegation Oversight Audit Tool, which is based on current standards, to sufficiently document information from the examined policies and procedures, committee minutes, files and other documents to meet standards, as well as to support conclusions reached.
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C. The Delegates have an exit interview with IEHP auditors at the completion of the Delegation Oversight Audit. This interview identifies areas found to be deficient, allowing the Delegates an opportunity to provide additional information within two (2) business days, to clear the deficiency and highlighting opportunities for improvements that need to be addressed through the CAP process.

D. Within thirty (30) calendar days of the audit, the Delegates receive written notification of the results of the audit. The written notification includes a cover letter and a completed audit tool noting any deficiencies found during the audit noted. The cover letter defines the timeframes for corrective action, and any other pertinent information.

E. Scoring categories for each section of the Delegation Oversight Audit are as follows:

1. Full Compliance 90-100%
2. Partial Compliance 80-89%
3. Non-compliance <79%

F. All Delegates that score 90% or greater pass that section of the audit. However, all Delegates with scores less than 100% may be required to submit a CAP to remedy any deficiencies noted on the audit tool.

1. The Delegates must submit a complete and comprehensive CAP response form to IEHP that adequately addresses all deficiencies for each section.

2. A CAP is considered complete only if all deficiencies from each section are present and submitted together. These sections are as follows:
   a. QM;
   b. UM;
   c. Credentialing & Re-credentialing;
   d. Compliance; and
   e. Care Management.

3. The Delegates are responsible for coordination of their CAP response with each of its internal departments responsible for addressing audit deficiencies.

4. IEHP does not accept CAPs for Delegation Oversight Audit and deficiencies when received in individual sections. These are returned to the Delegates and considered delinquent until a complete and all-inclusive CAP is received.

5. Each section of the CAP response must be clearly identified with supporting documentation attached and clearly labeled.

6. The CAP must be submitted to IEHP within thirty (30) calendar days of written notification by IEHP of the audit results.
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   a. The Delegation Oversight Audit score received for each section;
   b. A list of the deficiencies identified by IEHP;
   c. CAPs must identify the root cause analysis for the deficiency;
   d. CAPs must specifically state how the deficiency is corrected and must include supporting documentation, including policies and procedures, training agenda, training materials, and sign in sheets when applicable;
   e. Completion dates for each of the corrective actions;
   f. Identification of the person responsible for completing the corrective action; and
   g. Follow-up or monitoring plan to ensure that the corrective action plan is successful.

7. Upon receipt of the initial CAP, IEHP reviews the CAP and either approves or denies the CAP in writing within thirty (30) calendar days of receipt.

8. If the CAP is denied:

   a. IEHP will communicate all remaining deficiencies to the delegates with a written request for a second CAP.
   b. Delegates requiring a second CAP may be frozen to new Member enrollment until a CAP is received and approved.
   c. The Delegates are required to resubmit a second CAP within fifteen (15) calendar days to IEHP.

9. Upon receipt of the second CAP by IEHP:

   a. If the second CAP is approved, the CAP process is closed. If applicable, the Delegates are then re-opened to new Member enrollment.
   b. If the second CAP is denied, the Delegates may be placed in a contract cure process that gives the Delegates thirty (30) calendar days to adequately correct the deficiencies.

G. Delegates wishing to appeal the results of the initial Delegation Oversight Audit must do so in writing to the IEHP Director of Delegation Oversight or designee within thirty (30) calendar days of receiving their results. Delegates must cite reasons for their appeal, including disputed items or deficiencies.

H. After receiving a written appeal, the IEHP Director of Delegation Oversight or designee responds to the appealing Delegates in writing, noting the status of the appeal. Once an appeal is received, all additional documentation submitted by the Delegates is reviewed and, if appropriate, scores may be adjusted. If necessary, a re-assessment audit is performed for areas with scores being appealed.
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I. IEHP monitors for subsequent Delegates deficiencies through review of grievances, assessment of reports, and results of activities related to each area addressed by the Delegation Oversight Audits.

Other Oversight Activities or Focused and/or Clinical Audits

A. Other QM monitoring activities that could result in CAPs include but are not limited to:
   1. Monthly, Quarterly, Semi-Annual and Annual report submissions;
   2. UM, CM and Clams focused file audits;
   3. Grievance and Appeal audits;
   4. Compliance audits;
   5. Twenty-four (24) hour access studies;
   6. Appointment availability studies;
   7. Language competency audits;
   8. Clinical audits (including asthma, diabetes, etc.);
   9. Specific quality studies;
   10. Focused audits;
   11. Pharmacy audits;
   12. Audits determined necessary by the Delegation Oversight Committee; and/or
   13. Follow up audits.

B. IEHP reviews results of each audit or study and identifies deficiencies as noted in IEHP policies and procedures.

C. IEHP shares with its Delegates the annual plan-wide Appointment Availability and Access Study results. While IEHP does not require Delegates to submit CAPs for identified deficiencies in their network, IEHP does require Delegates to submit their Annual Appointment Availability and After-Hours Access Study program, results, corrective actions taken, follow-up call campaigns and proof of Provider training given to remediate any identified deficiencies.

D. Within thirty (30) calendar days of the audit or study, the Delegates receives written notification of the results including any required CAPs or sanctions. The written notification includes a cover letter and a completed audit tool (when applicable) noting any deficiencies found during the audit. Identified deficiencies will include requests for standard Corrective Action Plans (CAP) and/or Immediate Corrective Action Plans (ICAP). The cover letter defines the timeframes for corrective action, and any other pertinent information.
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1. The Delegates must submit a complete and comprehensive CAP response to IEHP that adequately addresses all deficiencies for each section.

2. A CAP is considered complete only if all deficiencies from each section are present and submitted together. These sections are as follows:
   a. QM;
   b. UM;
   c. Grievance and Appeals;
   d. Compliance; and
   e. Care Management.

3. The Delegates are responsible for coordination of its CAP response with each of its internal departments responsible for addressing audit deficiencies.

4. IEHP does not accept CAPs for multiple deficiencies when received in individual sections. These are returned to the Delegates and considered delinquent until a complete and all-inclusive CAP is received.

5. Each section of the CAP response must be clearly identified with supporting documentation attached and clearly labeled.

6. The CAP for ICAP findings must be submitted to IEHP within seventy-two (72) hours of the issuance of the written notification. The CAP for standard Corrective Action Plan findings must be submitted within thirty (30) calendar days of written notification by IEHP of the audit results, and must include the following:
   a. The Audit or Study score received for each section;
   b. A listing of the deficiencies as identified by IEHP;
   c. CAPs must identify the root cause analysis for the deficiency;
   d. CAPs must specifically state how the deficiency is corrected and must include supporting documentation, including policies and procedures, training agenda, training materials, and sign in sheets when applicable;
   e. Completion dates for each of the corrective actions;
   f. Identification and signature of the person responsible for completing the corrective action; and
   g. Follow-up or monitoring plan to ensure that the corrective action plan is successful.

7. Upon receipt of the initial CAP, IEHP reviews the CAP and either approves or denies the CAP in writing within thirty (30) calendar days of receipt. For Immediate Corrective Action Plans, IEHP will review the CAP and determine to approve or deny the CAP in writing within seventy-two (72) hours of receipt of the CAP.
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8. If the CAP is denied:
   a. IEHP will communicate all remaining deficiencies to the Delegates with a written request for a second CAP.
   b. Delegates requiring a second CAP may be frozen to new Member enrollment until a CAP is received and approved.
   c. For standard Corrective Action Plan findings, the Delegates are required to resubmit a second CAP response within fifteen (15) calendar days to IEHP. For Immediate Corrective Action Plan findings, the Delegates are required to submit a second CAP response within (72) hours to IEHP.

9. Upon receipt of the second CAP by IEHP:
   a. If the second CAP response is approved, the CAP process is closed. If applicable, the Delegates are then re-opened to new Member enrollment.
   b. If the second CAP response is denied, the Delegates may be placed in a contract cure process that gives the Delegates thirty (30) calendar days to adequately correct the deficiencies.

E. Delegates can appeal the results of any oversight activity, specialized study, audit and any required CAPs or sanctions to IEHP within thirty (30) calendar days of receiving their results. Delegates must cite reasons for their appeal, including disputed items or deficiencies.

F. After receiving a written appeal, the IEHP Director of Delegation Oversight or designee responds to the appealing Delegates in writing, noting the status of the appeal. Once an appeal is received, all additional documentation submitted by the Delegates is reviewed and, if appropriate, scores may be adjusted. If necessary, a re-assessment audit is performed for areas with scores being appealed.

G. Failure to submit CAPs may result in one of the following activities, depending on the nature of the audit or study and the seriousness of the deficiency:
   1. Delegates are frozen to new Member enrollment;
   2. Request for cure under contract compliance;
   3. Requirement to subcontract out the deficient activities within Management Services Organization (MSO) or Delegated IPA;
   4. De-delegation of specified functions;
   5. Contract non-renewal; or

REFERENCE:
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3. Corrective Action Plan Requirements

A. Department of Health Care Services (DHCS), Policy Letter (PL) 14-004 Supersedes PL 02-002, Site Reviews: Facility Site Review and Medical Record Review.
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E. Utilization Management
   1. 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 oversight 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 Delegates that meet IEHP UM standards except for 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 Work 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 who make utilization-related decisions are responsible for identifying barriers to care, and 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. Please see Policy 9H3, “Cultural and Linguistic Services – Non-Discrimination” for more information.

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

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

A. To ensure that IEHP and all 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 – A health plan, medical group, IPA, or any contracted organization delegated to provide utilization management services.

PROCEDURES:

A. UM Standards: IEHP is responsible for defining overall standards for UM activities performed by its Delegates. These standards must be performed in accordance with California Health and Safety Code Section 1367.01 and represent the minimum performance level acceptable to IEHP for its Delegates; however, Delegates can choose to exceed any specific standard.

B. Criteria: Delegates 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. IEHP may distribute additional criteria following approval by the IEHP UM Subcommittee.

1. Development: Criteria or guidelines that are developed by IEHP and used to determine whether to authorize, partially approve (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: IEHP and its Delegates are required to apply criteria in a consistent and appropriate manner based on available medical information and the needs of individual Members. 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. Decisions to deny services cannot be solely based on codes being listed as non-covered, i.e. Medi-Cal Treatment Authorization Request (TAR) and Non-Benefit list of codes. 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 Members, such as:
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a. Availability of skilled nursing facilities, subacute care facilities or home care in the organization’s service area to support the Member after hospital discharge;

b. 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

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

IEHP and its Delegates must ensure consistent application of UM criteria by following this specific order as IEHP or Delegate is licensed to use:

a. IEHP Member Handbook (Evidence of Coverage); then

b. Local Coverage Determination (LCD); then

c. National Coverage Determination (NCD); then

d. Medicare Benefit Policy Manual; then

e. National Comprehensive Cancer Network (NCCN) Drug and Biologics Compendium or IBM Watson Health Products: Micromedex; then

f. MCG Health Informed Care Strategies Care Guidelines; then

g. InterQual Criteria; then

h. Apollo Medical Review Criteria Guidelines for Managing Care; then

i. IEHP Utilization Management (UM) Subcommittee Approved Authorization Guidelines or Pharmacy and Therapeutics (P&T) Subcommittee Approved Prior Authorization Criteria.

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

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.

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 Providers, Members, Members’ representative or the public, upon request.
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IEHP and its Delegates 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 Providers 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” (See Attachment, “Response to Request for UM Criteria” in Section 25). IEHP and its Delegates must maintain a log of all requests for criteria (See Attachment, “Request for UM Criteria Log” in Section 25). 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 its Delegates may use one (1) 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.

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
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   may continue to receive services through the county. PCPs or Delegates 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 BH web forms available at
   www.iehp.org. PCPs or Delegates may contact the IEHP Provider Relations Team at (909)
   890-2054 for assistance.

C. Delegate UM Structure:
   1. IEHP and its Delegates 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 regarding UM issues; and
      g. Process to track open and unused referrals.
   2. **IEHP and 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 processes, including at a minimum, the following activities:
      a. Review and final decision making on referrals denied or partially approved
         (modified) for medical necessity to assure consistent processes and decision-making;
      b. Review of requests for out-of-network services must be based on medical necessity;
      c. Review of physician-specific UM data to assess for potential over and
         underutilization of services;
      d. Sign-off on all internal policies and procedures related to UM; and
      e. Chairing the UM Committee or designating a Chair.
   3. **IEHP and Delegate UM Committee** - Committee membership must include a minimum
      of three (3) practicing Physicians from its network, representing the appropriate
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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, denied and partially approved (modified) referrals to assess consistency of processes and decisions;
c. Review of physician-specific UM data to assess for 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 and 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 Providers of referral process;
k. Submission of plan reporting requirements; and
l. Dissemination of summary UM data to Providers.

5. Network Practitioner Responsibilities: Network Practitioners are required to follow established UM procedures for authorization that include:

a. Providing sufficient information for decision-making; and
b. Following IEHP or its 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
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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 Provider 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. Registered Nurse (RN)/Licensed Vocational Nurse (LVN) – initial review of medical information, initial determination of benefit coverage, obtaining additional medical information, as needed, from the Provider’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 denials and partial approvals 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 its 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.

   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.
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   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 concerning the provision of health care services for Members. These policies and procedures must be available to the public upon request. Mandated timeframes for decisions including approval, denial or partial approval (modification) of a request and subsequent notification to the Member and Provider are outlined below. 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 Providers seeking information about the UM Process and the authorization of care. This includes the following:

   a. IEHP and its 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 Provider level involves utilizing information such as medical records, test reports, specialist consults, and verbal communication with the requesting Provider 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
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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 or 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 except for emergent services.

   2) The timeframes for completion and adjudication of the referral are as follows:

      • Providers have two (2) working days from the determination that a referral
        is necessary to submit the referral and all supporting documentation.
        Providers 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, partially approve (modify), or deny, must be made
        according to industry standards. For more information, please see Policy
        14D, "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
      Provider must be contacted for the additional clinical information
      preferably by telephone at least two (2) times and if no documentation
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received a final call to the Provider would be at the discretion of a Medical Director. 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 Providers must be 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 Provider 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 14C, "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 Provider 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 Provider 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. The Delegate must have a written policy/job aid that outlines the mailroom process to ensure timely Member written 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 about the appeal/grievance process. The Delegate is responsible for ensuring the most recent version of the template is being utilized. These IEHP-approved notification templates are available online at www.iehp.org.

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, continuity of care and/or services or treatments rendered by a contracted or non-contracted Provider without prior authorization.

2) Relevant clinical information must be obtained and reviewed for medical necessity based on approved clinical criteria and applicable state and federal regulations. 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 Providers must be made within thirty (30) calendar 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
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   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. The Milliman Care Guidelines (MCG) term “role remains uncertain” does not delineate a request is considered experimental/investigational. These requests must be reviewed utilizing the next criteria set in the hierarchy. If there is no other criteria to review, the Delegate must forward the request to IEHP as outlined above.

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 and its Delegates are 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 www.iehp.org.) The Delegate is responsible for ensuring the most recent version of the template is being utilized:

   1) Required CMS denial

   2) (utilizing only approved CMS denial letter templates);

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

   4) Be made available in English & Spanish (IEHP Threshold Languages), upon request;
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5) Include information about how to request translation services and alternative formats. Alternative formats, which shall include materials that can be understood by persons with limited English proficiency;

6) 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;

7) 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 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 Attachments, “IEHP Universe Standard MSSAR Data Dictionary,” “IEHP Universe Standard Auth MSSAR Template,” “IEHP Universe Expedited Auth MESAR Data Dictionary,” and “IEHP Universe Expedited Auth MESAR Template” in Section 25). 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 Provider 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 Provider the opportunity to discuss any issues or concerns regarding the decision within seventy-two (72) hours of the initial notification of the denial or partial approval (modification). This written notification of denial or partial approvals
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(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 Provider 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 Provider 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 25E2, “Utilization Management Reporting Requirements,” the Delegate must send IEHP all documentation for each denial including the following:

1) Referral Universes (See Attachments, “IEHP Universe Standard Auth MSSAR Template” and “IEHP Universe Expedited Auth MESAR Template” in Section 25);
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 and Time;
   • RN/LVN or physician reviewer note from medical management system; and
   • Proof of date and time letter was mailed to the Member.
7) Criteria used for the determination;
8) Initial notification including opportunity to discuss; and
9) Audit trail to include all changes and dates made to the case.

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

j. For Delegates responsible for Medicare benefit only:
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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) Preventive services; and
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. All emergency care costs are covered. Please see Policy 14C, “Emergency Services” for more information.

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. For more information, please see Policy 14A3, "Standing Referral and Extended Access to Specialty Care " for more information.

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.
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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 Delegated 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 have 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 Provider 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;
   c. Employ IEHP approved UM standards including Milliman Care Guidelines, InterQual, Apollo Managed Care Guidelines/Medical Review Criteria, and IEHP UM Subcommittee Approved Authorized Guidelines;
   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 area of the health care services requested either through an UM Committee member, telephonically, or with an outside consultant.

3. **Denials because the requested service or procedure is not a covered benefit:** The IEHP Evidence of Coverage (EOC) 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
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   initiated through the Member’s Delegated IPA. Specialists caring for Members can request referrals directly from the Delegated 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 requesting Provider 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. 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 Provider 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 Delegates 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: The utilization management process must include:
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   a. Determining medical necessity.
   b. Determining appropriate level of care.
   c. Coordinating with hospital Case Manager’s 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;
      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 the Delegates, 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, “Grievance Resolution System”.

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I. Second Opinions: IEHP provides for its Members second opinion from a qualified health professional within the network at no cost to the Member or arranges for the Member to obtain a second opinion outside of the network, if services are not available within the network. Refer to Policy 14B, “Second Opinions” for more information.

J. New Technology: 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’s Chief Medical Officer or physician designee will identify and research new technology and new applications of existing technologies, including medical procedures, treatment, and devices. Research and investigation include 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 reference.

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 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-Delegated 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:
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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 (see Attachments, “IEHP Universe Standard Auth MSSAR Template” and “IEHP Universe Expedited Auth MESAR Template” in Section 25). Thirty (30) denial/partial approval (modification) files and ten (10) approval files are selected from the monthly SARAG SOD and EOD universe reports. Delegates are required to submit copies of all denial letters sent to Members and Providers. If the Provider appeals a denial to the Delegate, and the Delegate upholds the decision, the notification letter sent to the Provider, regarding the upheld decision, must be submitted to IEHP with the monthly submission of denials.

4. **Focused Referral and Denial Audits** – IEHP performs focused audits of the referral and denial process for Delegates. Please refer to Policy 25E3, “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 Delegation Oversight 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
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   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.

**REFERENCES:**

A. Health and Safety Code §§1363.5, 1367.01, 1374.16, 1383.15.
B. California Code of Regulations (CCR) §1300.70(b)(2)(H) and (G);
D. Medicare Managed Care Manual, “Part C & D Enrollee Grievances, Organization/Coverage Determinations, and Appeals Guidance”.
E. Coordinated Care Initiative (CCI) Three-Way Contract, Section 2.11, eff January 1st, 2018.
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2. 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.

D. 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.

DEFINITION:

A. Delegate – A medical group, IPA, or any contracted organization delegated to provide utilization management services.

PROCEDURES:

A. Monthly Reporting Requirements:

1. Reporting requirements include a monthly 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 approved, denied or partially approved (modified) and include the following:

   a. Referral Universe – Using the universe templates in Excel file format, the Delegate must report all approved, denied and partially approved (modified) referrals during the report period (See Attachments, “IEHP Universe Standard Auth MSSAR Template” and “IEHP Universe Expedited Auth MESAR Template” in Section 25).

   b. Denials and Partial Approvals (Modifications) – The Delegate must submit all referral and clinical information, as well as copies of all denial letters from the reporting period. Partial approvals (modifications) occur when a decision is made, and proposed care is denied or altered.
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2. Reporting Requirements

1) Reasons for Denials and Partial Approvals:

- **Not Medically Necessary** – Does not meet approved nationally recognized criteria or IEHP UM Subcommittee Approved Authorization Guidelines. Please see Policy 25E1, “Utilization Management Delegation and Monitoring” for a list of these criteria.

- **Out-of-Network** – Requested provider is a non-contracted Provider. Out-of-Network requests must be reviewed by a physician and must be considered as a medical necessity decision.

- **CCS** – Services requested are carved-out to California Children’s Services. Member must have an open, active case for the service requested.

- **Experimental** – Requested service has not been approved by the Food and Drug Administration (FDA) and/or is not an accepted practice in the medical community and/or has not been proven to have a therapeutic benefit.

- **Non-Benefit** – Not a covered benefit.

c. **Approval File Review** – Using the universe reports submitted by the Delegate, IEHP will select ten (10) Approval Files to audit. Delegate submissions of Approval Letters need to include the supporting documentation used to make the decisions. Delegates must submit all required documentation related to the file selections by the 15th day of the following month.

d. **Second Opinion Tracking Log** – Using the Second Opinion Tracking Log, the Delegate must report 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 25).

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, the Delegate’s 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** - The Delegate’s 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).
25. DELEGATION AND OVERSIGHT

E. Utilization Management
   2. Reporting Requirements

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

D. Any discrepancies in reported information are addressed with the IPA in accordance with monitoring activities outlined in Policy 25E1, “Utilization Management - Delegation and Monitoring”.

INLAND EMPIRE HEALTH PLAN

<table>
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<td>Chief Medical Officer</td>
<td>Revision Date:</td>
<td>January 1, 2020</td>
</tr>
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APPLIES TO:
A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Members.

POLICY:
A. Per IEHP Policy 25E1, “Utilization Management Delegation and Monitoring,” utilization management activities are delegated to contracted entities that meet IEHP UM standards.
B. IEHP performs a monthly retrospective audit of approved, denied and partially approved (modified) referrals submitted monthly by the Delegate.
C. IEHP performs a Delegation Oversight Audit (DOA) of all Delegates to review the utilization management process for approving, denying or partially approving (modifying) referrals as outlined under Policy 25E1, “Utilization Management Delegation and Monitoring”. Focused approved referral and denial audits are also performed when issues are identified.
D. Persistent non-compliance may result in the termination of the Delegate’s contract.

DEFINITION:
A. Delegate - A medical group, IPA, or any contracted organization delegated to provide utilization management (UM) services.

PROCEDURES:
Monthly Retrospective Audit of Denials and Partial Approvals (Modifications)
A. IEHP performs a monthly retrospective audit of up to thirty (30) denied and partially approved (modified) referrals submitted by the Delegate (See Attachment, “Delegated IPA Denial Log Review Tool – IEHP DualChoice” in Section 25).
C. In order to pass the monthly audit, the Delegates must achieve a:
   1. Score of 90% or greater on:
25. DELEGATION AND OVERSIGHT

E. Utilization Management
   3. Referral and Denial Audits

   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
   e. Critical Element #4: Correct Template.

2. Score of 5% or lesser on:
   a. Denial and Partial Approval (Modification) Rate
      1) Appropriateness and volume of denials and partial approvals (modifications) would be taken into consideration.

D. If the Delegate fails to achieve a Substantial Compliance score of 90% for two (2) consecutive months on any of the audit areas above, 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/partial approval review for a percentage of total denials/partial approvals (modifications) 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 leadership;
   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 IEHP’s Delegation Oversight Committee.

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

F. Delegates who disagree with the audit score can appeal in writing to the IEHP Deputy Chief Medical Officer (CMO) within thirty (30) calendar days after the release of the final audit results.

Monthly Retrospective Audit of Approvals

A. IEHP performs a monthly retrospective audit of ten (10) approved referral files selected by IEHP from the SARAG SOD and SARAG EOD universes submitted by the Delegate for that month.

B. IEHP may request for more approved referral files in addition to the ten (10) referral files submitted monthly by the Delegate.
25. DELEGATION AND OVERSIGHT

E. Utilization Management

3. Referral and Denial Audits

C. IEHP uses the SARAG SOD and SARAG EOD universes for the monthly retrospective approval audits to evaluate referral timeliness and document the examined referral results (See Attachments, “IEHP Universe Standard Auth MSSAR Data Dictionary,” “IEHP Universe Standard Auth MSSAR Template,” “IEHP Universe Expedited Auth MESAR Data Dictionary,” and “IEHP Universe Expedited Auth MESAR Template” in Section 25).

D. In order to pass the monthly audit, the Delegates must achieve a score of 90% or greater on the Overall Approval File Review (See Attachment, “Approved Referral Audit Tool” in Section 25).

E. 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 (1) 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 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 leadership; and/or

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

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

G. Delegates who disagree with the audit score can appeal in writing to the IEHP Deputy CMO within thirty (30) calendar days after the release of the final audit results.

Delegation Oversight Audit (DOA)

A. IEHP performs an onsite Delegation Oversight Audit (DOA) of all Delegates to review the UM process. Please refer to Delegation Oversight Audit Preparation Instructions (See Attachment, “Delegation Oversight Audit Preparation Instructions – IEHP DualChoice” in Section 25).

B. IEHP staff notifies the Delegate in writing at least thirty (30) days in advance of the scheduled annual audit. IEHP reserves the right to give as little as twenty-four (24) hours verbal notice for focused audits that occur between DOAs.

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

D. UM Process Review Components:
E. Utilization Management

3. Referral and Denial Audits

1. IEHP selects, at minimum, fifteen (15) approved/denied/partially approved/cancelled referrals to review. File review will be performed via webinar. The Delegate is responsible for walking IEHP through each referral via the Delegate’s medical management system.

2. IEHP ensures that mechanisms are in place to ensure data integrity.

3. One (1) hour before the audit, the Delegate will be provided with the list of referrals to be reviewed with the exception of the cancelled referrals.

4. IEHP will request details of the process used by the Delegate to ensure ongoing compliance with CMS regulations and Plan policies.

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

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

G. Delegates pass the UM Referral and Denial audit sections of the DOA if the Delegate achieves a score of 90% on the file review.

H. 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 Deputy CMO within thirty (30) calendar days after the release of the final audit results.

I. Delegates that score 90% may still be required to submit a CAP to address any deficiencies.

J. 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 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. Deficiencies identified through the monthly file review process;
   4. Number of Corrective Action Responses (CARs) issued to Delegate as a result of IEHP routine monitoring;
   5. Deficiencies identified through prior audits;
   6. Delegate self-reported compliance issues;
7. Potential risk areas identified by IEHP (i.e., Member and Provider grievances, appeals);
8. Number of months IEHP has placed Delegate on concurrent review for specific delegated UM functions;
9. Significant increase in volume of IEHP assigned Members in the applicable LOB;
10. A specific inquiry initiated by the Department of Managed Health Care (DMHC), Department of Health Care Services (DHCS), or Centers of Medicare and Medicaid Services (CMS); and
11. Any other circumstance that in the judgment of the IEHP Chief Medical Officer requires a focused audit.

B. Prior to the Focused Audit case file review the Delegate must submit the requested universe within the specified timeframe and successfully complete the Universe Integrity Audit:
1. Five (5) samples are randomly selected by the auditor and provided to the Delegate one (1) hour before the start of the audit webinar.
2. Each data element or column of the universe must be validated against the Delegate’s medical management system or documentation to ensure the information is consistent and accurate. Inconsistent or inaccurate data must be substantiated; otherwise, the case is considered a fail.
3. The Delegate must successfully pass three (3) of the five (5) cases selected. A failed Universe Integrity Audit will result in the auditor requesting the Delegate’s resubmission of a corrected universe. Three (3) failed universe resubmissions will result in an audit finding.

C. IEHP is responsible for conducting timeliness tests on identified measures via submitted universes, to ensure the Delegate’s compliance. Timeliness results falling below thresholds will be considered non-complaint and will be noted as a finding in the audit report.

D. IEHP selects thirty (30) cases which consist of approvals, denials and partial approvals (modifications) for the case file review. The cases are provided to the Delegate one (1) hour before the start of the audit webinar. Sample cases are reviewed against defined compliance standards to determine any areas of non-compliance and/or systemic problems within the Delegate’s utilization management process.

E. IEHP will also select five (5) cancelled referrals from the submitted universe to review for appropriateness. The cancelled referrals will not be provided to the Delegate prior to the audit webinar.

F. If IEHP identifies a potential issue during the case file review, additional detail will be required to determine:
1. If the issue is systemic;
2. The root cause of the issue; and
3. How many Members were impacted.

If the issue resulted in negatively impacting the Member, an Impact Analysis is requested immediately following the case file review to provide the Delegate adequate time to research and respond while still providing the auditors time to evaluate and influence the findings report.

G. IEHP determines the significance of audit findings based on results of the case review and impact analysis, if applicable. Audit findings can result in an Immediate Corrective Action Required, Corrective Action Required, an Invalid Data Submission, or Observation as described below:

1. **Immediate Corrective Action Required (ICAR)** – An ICAR is the result of an identified systemic deficiency during an audit that is so severe that it requires immediate correction. These types of issues are limited to situations where the identified deficiency resulted in a lack of access to medications and/or services or posed an immediate threat to Member’s health and safety. ICARs must be immediately addressed or remediated within three (3) business days from receipt of ICAR notification.

2. **Corrective Action Required (CAR)** – A CAR is the result of an identified systemic deficiency during an audit that must be corrected but does not rise to the level of significance of an ICAR. These issues may affect Members but are not of a nature that immediately affects their health and safety. Generally, they involve deficiencies with respect to non-existent or inadequate policies and procedures, systems, internal controls, training, operations or staffing. CARs must be addressed within thirty (30) calendar days from receipt of CAR notification.

3. **Invalid Data Submission (IDS)** – An IDS condition is cited when the Delegate fails to produce an accurate universe within three (3) attempts.

4. **Observations (OBS)** – Observations are identified conditions of non-compliance that are not systemic or represent a “one-off issue”.

H. IEHP will issue the audit findings report which will include the following and any corrective action requests:

1. Executive summary of the audit detailing the audit elements, the audit period, the number of cases reviewed, and the number of cases failed during the Universe Integrity audit (by category);

2. Universe integrity findings by listing noncompliance with instructions for populating each column in the Referral Universe;
25. DELEGATION AND OVERSIGHT

E. Utilization Management
   3. Referral and Denial Audits

3. The results of timeliness testing for each authorization priority level (urgent, routine and retrospective), including the percent of compliance for decision-making, Member notification and Provider notification; and

4. All identified findings (conditions) for each authorization priority level (urgent, routine and retrospective) referencing the specific regulation, accreditation standard or Plan policy found deficient, including specific examples from the case review audit, and the action steps required.

I. IEHP will review and approve ICARs and CARs after IEHP determines that CAPs adequately address all the identified deficiencies.

J. IEHP will perform a CAP validation webinar audit to ensure that all CAPs have been implemented per Delegate’s CAP.

K. Once validation is complete, and all findings have been resolved, then IEHP will close out the focused audit CAP and notify the Delegate. Any unresolved findings will require for the CAP to remain open. 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 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 leadership; and/or

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

E. Utilization Management
   3. Referral and Denial Audits

REFERENCES:

A. Health and Safety Code §1367.01(a) & (b).
B. Coordinated Care Initiative (CCI) Three-Way Contract, Section 2.2 eff January 1st, 2018.
C. Medicare Managed Care Manual, “Part C &D Enrollee Grievances, Organization/Coverage Determinations, and Appeals Guidance”.

INLAND EMPIRE HEALTH PLAN

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25. DELEGATION AND OVERSIGHT

F. Encounter Data Reporting

1. Medicare MMP Reporting Requirements – IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan)

APPLIES TO:

A. This policy applies to all IEHP Capitated Delegates contracting with IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan).

POLICY:

A. IEHP contractually requires Delegates to submit all Medicare – Medicaid Plan (MMP) Core and California-Specific reports according to the IEHP DualChoice MMP Core and California-Specific Measures Reporting Schedule. All Delegates must meet timeliness and accuracy for all MMP Core and California-Specific reporting requirements, as outlined in the most current MMP Core and California-Specific Measures Reporting Requirements document.

B. IEHP may impose a penalty on any Delegate who fails to meet the timeliness and accuracy reporting requirements.

DEFINITION:

A. Delegate – For the purpose of this policy, this is defined as a medical group, IPA, vendor, or any other contracted organization delegated to provide services.

PURPOSE:

A. Delegates are required to submit this data to enable IEHP to comply with regulatory reporting requirements.

PROCEDURES:

A. Delegates are required to provide the MMP Core and California-Specific data elements that are reported to the Centers for Medicare and Medicaid (CMS) on a pre-determined schedule. Delegates must submit IEHP DualChoice) data for all MMP Core measures and California-Specific measures as follows:


2. California-Specific Reporting Requirements (See Attachment, “California Specific Reporting Requirements,” in Section 25).
25. DELEGATION AND OVERSIGHT

F. Encounter Data Reporting
   1. Medicare MMP Reporting Requirements – IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan)

B. Delegates must submit via Secure File Transfer Protocol (SFTP) the required report with the appropriate naming convention to IEHP on a monthly, quarterly, semi-annual and/or annual basis (See Attachment, “Medicare Provider Reporting Requirements Schedule” in Section 25).

C. Delegates must provide complete and accurate data submissions for each element requested for each reportable measure. CMS MMP Core and/or California-Specific reporting are according to Attachments, “2018-2019 Medicare-Medicaid (MM) Capitated Financial Alignment Model Reporting Requirements” and “California Specific Reporting Requirements.” Details for the Universe template layouts are available as follows:

D. For each reportable measure, Delegates must use the provided reporting template that supports the required reporting elements:
   1. Reporting Template - The report includes aggregate metrics supporting each element specified for each measure. Delegates must use the most current IEHP Reporting Template spreadsheet for each reportable measure (See Attachments, “Care Transition Cases Log,” “IEHP Universe M_Claims Template,” “IEHP Universe Standard Auth MSSAR Template,” “IEHP Universe Expedited Auth MESAR Template,” “Monthly Medicare Care Management Log,” “Monthly Care Management Outreach Log” and “Enrollee Protections Report Template” in Section 25).

E. If CMS releases revised MMP Core and/or California-Specific Reporting specifications for the measures requested during the reportable calendar year, Delegates must re-submit any previously submitted monthly, quarterly and/or annual reports with corresponding reporting template using the most current reporting specifications. Resubmissions must be complete within IEHP-defined timelines. IEHP and IEHP’s Delegates must comply with all CMS reporting formats and timeframes.

F. Any questions Delegates have regarding CMS MMP Core or California-Specific reporting requirements should be communicated through the IEHP’s Provider Services Department.

G. IEHP works with each Delegate to ensure that any identified problem areas are corrected in a timely manner. Additionally, when a report and/or data file is not submitted to IEHP by the due date, IEHP requests a Corrective Action Plan (CAP) from the Delegate to remedy the problem, as follows:
   1. IEHP sends a letter to the Delegate requesting a CAP. The letter details the following:
      a. The report(s) that did not meet the requirements;
25. DELEGATION AND OVERSIGHT

F. Encounter Data Reporting
   1. Medicare MMP Reporting Requirements – IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan)

   b. The dates when the report was due to IEHP;
   c. The file names for all reporting data files that did not meet the requirements;
   d. The reasons the report and/or data files did not meet the requirements, whether it was: timeliness, validity, adequacy, or a combination of the three;
   e. The date the CAP is due to IEHP; and
   f. Request for a date when the submission of the report and/or data file(s) in question will be sent to IEHP.

   2. Failure to submit MMP Core and/or California-Specific Reports that meet IEHP’s submission requirements for Timeliness and Accuracy may result in IEHP deducting one percent, unless successfully appealed, of the Delegate’s monthly capitation for reports that fails to meet Timeliness and Accuracy requirement.

ATTACHMENTS (SEE IN SECTION 25):

A. Care Transition Cases Log (TOC Log)
B. Care Coordinator to Member Ratio Template (5.1)
C. IEHP Universe M_Claims Template
D. IEHP Universe MMP Provider Payment Request M_Claims Data Dictionary
E. IEHP Universe Standard Service Authorization Request MSSAR Template
F. IEHP Universe Standard Service Authorization Request MSSAR Data Dictionary
G. IEHP Universe Expedited Service Authorization Request MESAR Record Template
H. IEHP Universe Expedited Service Authorization Request (MESAR) Data Dictionary
I. Monthly Medicare Care Management Log
J. Enrollee Protections Report Template, CA2.1
K. Care Coordinator Training for Supporting Self-Direction Under the Demonstration
L. Medicare Provider Reporting Requirements Schedule
M. California Specific Reporting Requirements
N. Specialty Mental Health Care Coordination Log – CA1.7
O. Monthly Care Management Outreach Log

REFERENCES:
F. Encounter Data Reporting

1. Medicare MMP Reporting Requirements – IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan)


B. Medicare-Medicaid Capitated Financial Alignment Model Core Reporting Requirements, effective date 01/2019.
25. DELEGATION AND OVERSIGHT

F. Encounter Data Reporting

2. Medicare DualChoice Data Sharing Program

APPLIES TO:

A. This policy applies to all IEHP DualChoice Cal MediConnect Plan (Medicare – Medicaid Plan) Providers, Provider Subcontractors and Delegated Independent Physician Associations (IPAs), including IEHP Direct.

POLICY:

A. IEHP will share with Delegated IPAs and Provider Subcontractors, Member information that supports Care Coordination activities for its Members. Specifically;

1. Completed Health Risk Assessment (HRA) data;
2. Care Management Care Plans (if applicable);
3. Care Management Program Details;
4. Open Authorizations;
5. Medicare Hierarchical Condition Categories (HCC) information;
6. Monthly Membership Report (MMR) and MOR (Model Output Report) data files;
7. Annual Model Output Report Final (MORF);
8. Supplemental Data (e.g. Healthcare Effectiveness Data and Information Set (HEDIS®), Risk Adjustment Processing System (RAPS), lab results, pharmacy claims data);
9. Eligibility;
10. Encounters;
11. Capitation; and
12. Historical Utilization (e.g. Historical claims for assigned IEHP DualChoice Cal MediConnect (Medicare-Medicaid) Members, Medi-Cal Fee-For-Service Claims, Medicare Part A, Part B and Part D data and In-Home Supportive Services (IHSS) Payment Data).

B. Each Delegated IPA and subcontractor is required to have a process to receive and act on all information sent to them from IEHP for purposes of supporting Member care coordination activities.

C. Each Delegated IPA and subcontractor agrees to share with IEHP available supplemental data related to HEDIS®, STARS, Cal MediConnect Quality Withhold Measures, Risk Adjustment and other Quality Management and Quality Improvement Activities.
25. **DELEGATION AND OVERSIGHT**

F. **Encounter Data Reporting**

2. **Medicare DualChoice Data Sharing Program**

**PROCEDURES:**

A. On a daily basis, IEHP will provide a file of all newly completed initial HRAs to the Delegated IPAs via the secure IEHP Provider web portal for IEHP DualChoice Members assigned to the Delegated IPA.

B. On a weekly basis, IEHP will provide a file of all newly completed annual reassessment HRAs to the Delegated IPAs via the secure IEHP Provider Web Portal for IEHP DualChoice Members assigned to the Delegated IPA.

C. On a monthly basis, IEHP will provide the Delegated IPA the following Care Management information on all newly transitioned Members from IEHP-Direct:

1. Most current HRA completed survey (if applicable); and
2. Most current and up-to-date Care Plan (if applicable).

The Delegated IPA is required to review this information and assess the Member’s needs for continued support from in the Delegated IPA’s Care Management program/s. On a monthly basis, IEHP will provide a listing of all open authorizations for Members newly transitioned from IEHP Direct into a Delegated IPA. This information is transmitted via Secure File Transfer Protocol (SFTP).

D. On a monthly basis, IEHP provides a roster of all Members due for preventive care services or who have gaps in care based on the IEHP Quality Improvement program. This information will be shared via the secure IEHP Provider web portal. This information should be reviewed and incorporated into the Delegated IPAs Quality Improvement program activities/work plan.

E. On a monthly basis, during the first week of each month, IEHP will provide a listing of all CMS-stored HCC Member Information Profile report information related to Members who newly transitioned from IEHP Direct to a Delegated IPA (including the MMR, MOR, Annual MORF and RAPS Return Files). This information will be shared via SFTP. This information should be reviewed and incorporated into the Delegated IPA’s HCC program activities/annual work plan.

F. On a monthly basis, during the first week of each month, IEHP will provide HCC Member Information Profile reports for all Members assigned to the Delegated IPA. This information will be shared via SFTP. This information should be reviewed and incorporated into the Delegated IPAs HCC program activities/work plan.

G. On a monthly/weekly basis, IEHP will provide a listing of assigned membership. This information will be transmitted via SFTP.
25. DELEGATION AND OVERSIGHT

F. Encounter Data Reporting
   2. Medicare DualChoice Data Sharing Program

H. On a monthly/weekly/daily basis, IEHP will provide a summary of encounters submitted to the health plan. This information will be transmitted via SFTP.

I. On a monthly basis, IEHP will provide capitation information for the prior month. This information will be transmitted via SFTP.

J. On a monthly basis, IEHP will provide historical claims for assigned Cal MediConnect Members, Medi-Cal FFS claims, Medicare Part A, Part B and Part D data and IHSS payment data. This information will be transmitted via SFTP.

K. On a semi-annual basis (or more frequently), the Delegated IPA will share with IEHP any supplemental data to support HEDIS®, Quality Withhold, Risk Adjustment or any other Quality Improvement Activities.

1. The type, format, mode of transmission and frequency of this supplemental data sharing will be mutually agreed-upon by both the Delegated IPA and IEHP. IEHP will accept the approved ICE (Industry Collaboration Effort) Alternative Submission Method (ASM) data file template in lieu of a RAPS submission. Additionally, the Delegated IPA will also be required to submit an encounter for each DOS submitted on the ASM file {http://iceforhealth.org}.

2. For HCC supplemental data sharing, the format of HCC supplemental data files must be approved by IEHP prior to submission for RAPS processing. The Delegated IPA must submit any additional validated HCC data following CMS Risk Adjustment data submission timelines (e.g., CMS Sweeps). To process data files prior to the CMS Sweeps deadline, all data files should be submitted to IEHP according to the following Sweeps timeline.

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INLAND EMPIRE HEALTH PLAN

Chief Approval: Signature on File | Original Effective Date: | July 1, 2014
Chief Title: Chief Medical Officer | Revision Date: | January 1, 2020

IEHP Provider Policy and Procedure Manual 01/20 Medicare DualChoice
## 25. DELEGATION AND OVERSIGHT

### Attachments

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<td>California Specific Reporting Requirements</td>
<td>25F1</td>
</tr>
<tr>
<td>Care Coordinator to Member Ratio Template 5.1</td>
<td>25F1</td>
</tr>
<tr>
<td>Care Coordinator Training for Supporting Self-Direction Under the Demo</td>
<td></td>
</tr>
<tr>
<td>Care Transition Cases Log (TOC Log)</td>
<td>25F1</td>
</tr>
<tr>
<td>Credentialing DOA Audit Tool</td>
<td>25B8</td>
</tr>
<tr>
<td>Credentialing and Recredentialing Report</td>
<td>25B10</td>
</tr>
<tr>
<td>Enrollee Protections Reporting Template</td>
<td>25F1</td>
</tr>
<tr>
<td>IEHP Universe Expedited Auth MESAR Data Dictionary</td>
<td></td>
</tr>
<tr>
<td>IEHP Universe Expedited Auth MESAR Template</td>
<td>25E1, 25E2, 25E3, 25F1</td>
</tr>
<tr>
<td>IEHP Universe M_Claims Data Dictionary</td>
<td>25F1</td>
</tr>
<tr>
<td>IEHP Universe M_Claims Template</td>
<td>25F1</td>
</tr>
<tr>
<td>IEHP Universe Standard Auth MSSAR Data Dictionary</td>
<td>25E1, 25E3, 25F1</td>
</tr>
<tr>
<td>IPA Biographical Information Sheet</td>
<td>25A1</td>
</tr>
<tr>
<td>Delegated IPA Delegation Agreement – IEHP DualChoice</td>
<td>25A1</td>
</tr>
<tr>
<td>Delegated IPA Denial Log Review Tool – IEHP DualChoice</td>
<td>25E3</td>
</tr>
<tr>
<td>Delegation Oversight Audit Preparation Instructions – IEHP DualChoice</td>
<td>25A1, 25E3</td>
</tr>
<tr>
<td>Medicare Provider Reporting Requirements Schedule</td>
<td>25A1, 25C3, 25D2, 25F1</td>
</tr>
<tr>
<td>Delegated IPA Care Management Review Tool</td>
<td>25C1</td>
</tr>
<tr>
<td>Monthly Medicare Care Plan Outreach Log</td>
<td>25F1</td>
</tr>
<tr>
<td>Precontractual Audit Preparation Instructions – IEHP DualChoice</td>
<td></td>
</tr>
<tr>
<td>Second Opinion Tracking Log</td>
<td>25E2</td>
</tr>
</tbody>
</table>
## 25. DELEGATION AND OVERSIGHT

**Attachments**

<table>
<thead>
<tr>
<th>DESCRIPTION</th>
<th>POLICY CROSS REFERENCE</th>
</tr>
</thead>
<tbody>
<tr>
<td>QI UM CM DOA Audit Tool</td>
<td>25E1</td>
</tr>
<tr>
<td>Response to Request for UM Criteria</td>
<td>25E1</td>
</tr>
<tr>
<td>Request for UM Criteria Log</td>
<td>25E1</td>
</tr>
<tr>
<td>Subcontracted Facility/Agency Services and Delegated Functions</td>
<td>25A2</td>
</tr>
</tbody>
</table>
MEDICARE-MEDICAID
CAPITATED FINANCIAL ALIGNMENT MODEL
REPORTING REQUIREMENTS

Effective as of January 1, 2018; Issued October 25, 2017
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INTRODUCTION

The Medicare-Medicaid Financial Alignment Initiative is designed to test innovative models to better align Medicare and Medicaid financing and the services provided to Medicare-Medicaid enrollees.

The purpose of this document is to provide Medicare-Medicaid Plans (MMPs) with the reporting requirements for the capitated financial alignment model. It provides technical specifications to help assure a common understanding of the data to be reported by MMPs, to assist MMPs in preparing and submitting datasets, to ensure a high level of accuracy in the data reported to the Centers for Medicare & Medicaid Services (CMS) and the states, and to reduce the need for MMPs to correct and resubmit data.

The reporting requirements document is divided into three sections. The first section lists all Medicare Part C reporting requirements the MMPs are responsible for submitting via the Health Plan Management System (HPMS). The second section lists all Medicare Part D reporting requirements the MMPs are responsible for submitting via HPMS. Upon Office of Management and Budget (OMB) approval, MMPs are required to report these measures according to the existing specifications and must comply with the Part C and Part D data validation requirements.

The third section consists of the MMP-specific core reporting requirements for the capitated financial alignment model. Specifications for these demonstration measures indicate their reporting frequency and due dates. MMPs are also required to comply with validation requirements for MMP-specific measures.

Measures should be reported at the contract level, unless otherwise indicated.

Definitions

The following terms are used throughout the document:

Medicare-Medicaid Plan (MMP): An MMP is a managed care plan that has entered into a three-way contract with CMS and the state in which the plan will operate. Note: some demonstrations might use different terms to refer to their plans, such as One Care plans in Massachusetts.

State: The state with which the MMP has contracted.

Health Plan Management System (HPMS): The CMS centralized information system used by MMPs to submit Part C, Part D, and MMP-specific core measure data.

Calendar Quarter: All quarterly measures are reported on calendar quarters. The four calendar quarters of each calendar year will be as follows: 1/1 – 3/31, 4/1 – 6/30, 7/1 – 9/30, and 10/1 – 12/31.

Calendar Year: All annual measures are reported on a calendar year basis.
Passive Enrollment and Stopping Enrollment

Under the capitated financial alignment model, demonstrations may allow for passive enrollment. During passive enrollment, MMPs must demonstrate adequate performance across a range of measures to remain eligible to receive passive enrollment of beneficiaries. Failure to adequately meet any single measure or set of measures may result in CMS and the state ceasing enrollment. CMS and each state, through the Contract Management Team (CMT), will have the option to discontinue passive enrollment for MMPs for various reasons, including for MMPs failing to completely and accurately report measures or to adequately meet performance standards.

Quality Withhold Measures

CMS and each state will establish a set of quality withhold measures, and MMPs will be required to meet established thresholds. Throughout this document, CMS core quality withhold measures are marked with the following symbol for Demonstration Year 1: (i) and the following symbol for Demonstration Years 2 through 5: (ii). Note that additional CMS core quality withhold measures are reported through other vehicles or venues, such as HEDIS® and CAHPS®. Any state state-specific exceptions to the CMS core quality withhold measures, along with definitions of Demonstration Years, are noted in the state-specific quality withhold appendices. Additional information on the withhold methodology can be found at: http://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/InformationandGuidanceforPlans.html.

Reporting on Disenrolled and Retro-disenrolled Members

Unless otherwise indicated in the reporting requirements, MMPs should report on all members enrolled in the demonstration who meet the definition of the data elements, regardless of whether that member was subsequently disenrolled from the MMP. Measure-specific guidance on how to report on disenrolled members is provided under the Notes section of each MMP-specific core measure.

Due to retro-disenrollment of members, there may be instances where there is a lag between a member’s effective disenrollment date and the date on which the MMP is informed about that disenrollment. This time lag might create occasional data inaccuracies if an MMP includes members in reports who had in fact disenrolled before the start of the reporting period. If MMPs are aware at the time of reporting that a member has been retro-disenrolled with a disenrollment effective date prior to the reporting period (and therefore was not enrolled during the reporting period in question),

1 HEDIS® is a registered trademark of the National Committee for Quality Assurance (NCQA). CAHPS® is a registered trademark of the Agency for Healthcare Research and Quality (AHRQ).
then MMPs may exclude that member from reporting. Please note that MMPs are *not* required to re-submit corrected data should they be informed of a retro-disenrollment subsequent to a reporting deadline. MMPs should act upon their best and most current knowledge at the time of reporting regarding each member’s enrollment status.

**Data Submission**

All MMPs will submit core measure data in accordance with the guidance in these reporting requirements. Submission requirements vary by measure, but most core measures are reported through HPMS.

Please note, late submissions may result in compliance action from CMS.

**Resubmission of MMP-Specific Core Measure Data to HPMS**

MMPs must comply with the following steps to resubmit data for MMP-specific core measures after an established due date:

1. Email the applicable NORC HelpDesk to request resubmission.
   - Specify in the email which measures need resubmission;
   - Specify for which reporting period(s) the resubmission is needed; and
   - Provide a brief explanation for why the data need to be resubmitted.

   After review of the request, the NORC HelpDesk will notify the MMP that the resubmission can be completed.

2. Resubmit data through HPMS.

3. Notify the NORC HelpDesk again after resubmission has been completed.

Please note, requests for resubmission after an established due date may result in compliance action from CMS.
MEDICARE PART C REPORTING REQUIREMENTS

MMPs are required to report the following Part C reporting sections according to existing reporting requirements and technical specifications, which can be found on the CMS website at: https://www.cms.gov/Medicare/Health-Plans/HealthPlansGenInfo/ReportingRequirements.html

Section V. Grievances

Section VI. Organization Determinations/Reconsiderations

Section XV. Rewards and Incentives Programs

Section XVII. Payments to Providers
MEDICARE PART D REPORTING REQUIREMENTS

MMPs are required to report the following Part D reporting sections according to existing reporting requirements and technical specifications, which can be found on the CMS website at: https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/RxContracting_ReportingOversight.html

Section II. Retail, Home Infusion, and Long-Term Care Pharmacy Access

Section III. Medication Therapy Management Programs

Section IV. Grievances

Section V. Improving Drug Utilization Review Controls

Section VI. Coverage Determinations and Redeterminations
MMP-SPECIFIC CORE REPORTING REQUIREMENTS

Introduction

The core reporting requirements section consists of measures developed for all capitated financial alignment demonstrations. State-specific appendices capture the reporting requirements specific to each state’s demonstration. The core and state-specific measures supplement existing Medicare Part C and Part D reporting requirements, as well as measures that MMPs report via other vehicles or venues, such as HEDIS®, HOS, CAHPS® and state Medicaid agencies. In addition, CMS and the states will track key utilization measures, which are not included in this document, using encounter and claims data. The quantitative measures are part of broader oversight, monitoring, and performance improvement processes that include several other components and data sources not described in this document.

Value Sets

The measure specifications in this section refer to code value sets that must be used to determine and report measure data element values. A value set is the complete set of codes used to identify a service or condition included in a measure. The Core Value Sets Workbook includes all value sets and codes needed to report certain MMP-specific measures included in the Core Reporting Requirements and is intended to be used in conjunction with the measure specifications outlined in this document. The Core Value Sets Workbook can be found on the CMS website at the following address: http://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/InformationandGuidanceforPlans.html.

Reporting Phases

There are three distinct types of reporting phases for demonstration measures: “Implementation,” “Ongoing,” and “Continuous Reporting.”

The Implementation phase corresponds with the initial months of the demonstration and will be further defined in the Introduction section of each state-specific appendix. Monitoring will be more intensive during this phase to allow CMS and the state to quickly become aware of any performance or access issues. MMPs will report measures on the Implementation reporting timeline during the Implementation phase only.

2 HEDIS® is a registered trademark of NCQA. CAHPS® is a registered trademark of AHRQ.
The **Ongoing** phase begins at the inception of the demonstration and continues for the life of the demonstration. MMPs will report measures on the Ongoing reporting timeline during the Ongoing phase. Note: Measures that have both an Implementation and Ongoing phase should be reported concurrently (e.g., Core Measure 2.1, Members with an assessment completed within 90 days of enrollment). MMPs will cease reporting on the Implementation reporting timeline once the Implementation phase is complete. Some measures do not include an Ongoing phase, meaning data are collected only during the Implementation phase.

Continuous Reporting measures will be reported at the same frequency for the duration of the demonstration. The first reporting period for these measures coincides with the first reporting period of the Ongoing and Implementation phases.

Reporting timelines are defined in terms of calendar days, not business days. If a reporting due date for any core measure falls on a weekend or a federal holiday, MMPs may submit data on the following business day. Table 1 and Table 2 below are examples of reporting timelines that will be found throughout this section. The introduction of each state-specific appendix provides tables describing each state’s Implementation, Ongoing, and Continuous Reporting periods.

### Table 1. Sample Implementation and Ongoing reporting timeline

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Period</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>Monthly, beginning after 90 days</td>
<td>Contract</td>
<td>Current Calendar Month Ex: 1/1 – 1/31</td>
<td>By the end of the month following the last day of the reporting period</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Periods</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>Quarterly</td>
<td>Contract</td>
<td>Current Calendar Quarter Ex: 1/1-3/31 4/1-6/30 7/1-9/30 10/1-12/31</td>
<td>By the end of the second month following the last day of the reporting period</td>
</tr>
</tbody>
</table>
Table 2. Sample Continuous Reporting timeline

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Periods</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example</td>
<td>Quarterly</td>
<td>Contract</td>
<td>Current</td>
<td>By the end of the second month following the last day of the reporting period</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Calendar Quarter</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Ex:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1/1-3/31</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4/1-6/30</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>7/1-9/30</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>10/1-12/31</td>
<td></td>
</tr>
</tbody>
</table>

**Measure Specifications**

Each measure specification includes information regarding the following subjects:

A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

C. Edits and Validation Checks - validation checks that should be performed by each MMP prior to data submission.

D. Analysis - how CMS will evaluate reported data, as well as how other data sources may be monitored.

E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

F. Data Submission - how MMPs will submit data collected to CMS and the state.

**Hybrid Sampling**

Some demonstration-specific measures may require medical record/supplemental documentation review to identify the numerator. In these instances, the sample size should be 411 (where feasible), plus additional records to allow for substitution. A sample of 411 is a standard sample size used by multiple reporting programs, such as HEDIS and the Medicaid adult core set. Sampling should be systematic to ensure that all individuals eligible for a measure have an equal chance of inclusion.
MMPs should complete the following steps for each measure that requires medical record review:

**Step 1:** Determine the eligible population. Create a list of eligible members, including full name, date of birth, and event (if applicable).

**Step 2:** Determine the final sample size. The final sample size will be 411 plus an adequate number of additional records to make substitutions. Oversample only enough to guarantee that the targeted sample size of 411 is met. The following oversampling rates are acceptable: 5 percent, 10 percent, 15 percent, or 20 percent. If oversampling, round up to the next whole number when determining the final sample size.

**Step 3:** If the eligible population exceeds the final sample size as determined in Step 2, proceed to Step 5. If the eligible population is less than or equal to the final sample size as determined in Step 2, proceed to Step 4.

**Step 4:** If the eligible population is less than or equal to the final sample size as determined in Step 2, the sample size can be reduced from 411 cases to a reduced final sample size by using the following formula:

\[
\text{Reduced Final Sample Size} = \frac{\text{Original Final Sample Size}}{1 + \left(\frac{\text{Original Final Sample Size}}{\text{Eligible Population}}\right)}
\]

Where the *Original Final Sample Size* is the number derived from Step 2, and the *Eligible Population* is the number derived from Step 1.

**Step 5:** Sort the list of eligible members in alphabetical order by last name, first name, date of birth and event (if applicable). Sort this list by last name from A to Z during even reporting periods and from Z to A in odd reporting periods (i.e., name will be sorted from A to Z in 2014, 2016, and 2018 and from Z to A in 2015, 2017, and 2019.

**Note:** Sort order applies to all components. For example, for reporting period 2014, the last name, first name, date of birth, and events will be ascending.

**Step 6:** Calculate *N*, which will determine which member will start your sample. Round down to the nearest whole number.

\[
N = \frac{\text{Eligible Population}}{\text{Final Sample Size}}
\]

Where the *Eligible Population* is the number derived from Step 1. The *Final Sample Size* is either:
○ The number derived from Step 2, for instances in which the eligible population exceeds the final sample size as determined in Step 2.

OR

○ The number derived in Step 4, for instances in which the eligible population was less than or equal to the number derived from Step 2.

**Step 7:** Randomly select starting point, \( k \), by choosing a number between one and \( N \) using a table of random numbers or a computer-generated random number.

**Step 8:** Select every \( k \)th record thereafter until the selection of the sample size is completed.
Section I. Access

1.1 Claims (excluding pharmacy point of sale [POS]) denied during the first 90 days of enrollment with the MMP, by reason for denial. – Retired

1.2 Pharmacy point-of-sale (POS) claims denied during passive enrollment, by reason for denial.

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Periods</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Access</td>
<td>Every 14 days during the first month of a wave of passive (subsequent submissions may be necessary for MMPs that meet or exceed the threshold or have an insufficient sample size)</td>
<td>Contract</td>
<td>14 days Ex: 12:00a.m. on January 1st through 11:59p.m. on January 14th and 12:00a.m. on January 15th through 11:59p.m. on January 28th.</td>
<td>5:00p.m. ET three days following the end of the reporting period Ex: Data is due by 5:00p.m. ET on January 17th for the reporting period that ends at 11:59p.m. ET on January 14th. Data is due by 5:00p.m. ET on January 31st for the reporting period that ends at 11:59p.m. ET on January 28th.</td>
</tr>
</tbody>
</table>

The list of pharmacy POS denied claims will be limited to claims denied for the following reasons: non-formulary, prior authorization, and step therapy. A template for providing these claims is located on the CMS Financial Alignment Initiative website: http://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/InformationandGuidanceforPlans.html

A. Data elements definitions-details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

- Required file format is Microsoft Excel file.
- The file name extension should be “.xlsx”
- File name= RX_(STATEABBREVIATION)_(CONTRACTID)_(REPORTING PERIOD)_(SUBMISSIONDATE).xlsx.
- Replace (STATEABBREVIATION) with the two-character state abbreviation (e.g., Massachusetts is MA), (CONTRACTID) with the contract ID, (REPORTINGPERIOD) with the month and year of the beginning of the reporting period in YYYYMM format (e.g., January 2018 would be 201801), and (SUBMISSIONDATE) with the year, month, and day of the submission in YYYYMMDD format (e.g., January 17, 2018 would be 20180117).

- The first worksheet in the template should be named “Rejected Claims.”
- The second worksheet in the template should be named “Key Acronyms.”
- The third worksheet in the template should be named “Addl Reject Codes_Pharmacy Msgs.”

**File Layout**

<table>
<thead>
<tr>
<th>Field Name</th>
<th>Field Description</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>HICN</td>
<td>Health insurance claim number (HICN) refers to the number assigned by the Social Security Administration to an individual for the purpose of identifying him/her as a Medicare beneficiary. HICN will be shown in the beneficiary's insurance card and it is on the basis of this number that a beneficiary’s Medicare claims are processed.</td>
<td>Field Type: Alpha-numeric</td>
</tr>
<tr>
<td>Member Enrollment Date</td>
<td>Identifies the date that each member enrolled. Enrollment eligibility begins on the 1st of the month. If a member has a gap in coverage, provide the most recent enrollment date.</td>
<td>Field Type: Date in MM/DD/YYYY format</td>
</tr>
<tr>
<td>Member Disenrollment Date</td>
<td>Identifies the date that each member disenrolled. Eligibility continues through the last day of the month that the member disenrolls.</td>
<td>Field Type: Date in MM/DD/YYYY format If a member is still enrolled during the reporting period, please insert 12/31/9999 to indicate the member is currently enrolled.</td>
</tr>
<tr>
<td>Cardholder ID</td>
<td>Insurance ID assigned to the cardholder or identification number used by the MMP. May be the same as HICN.</td>
<td>Field Type: Alpha-numeric</td>
</tr>
<tr>
<td>CCN</td>
<td>Claim Control Number (CCN). A claim control number is a unique number given to each claim.</td>
<td>Field Type: Alpha-numeric</td>
</tr>
<tr>
<td>Field Name</td>
<td>Field Description</td>
<td>Allowable Values</td>
</tr>
<tr>
<td>----------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>CMS Contract ID</td>
<td>Designation assigned by CMS that identifies a specific sponsor.</td>
<td>Field Type: Alpha-numeric</td>
</tr>
<tr>
<td>Plan Name</td>
<td>Plan Name</td>
<td>Field Type: Text</td>
</tr>
<tr>
<td>NDC 11 (no hyphens)</td>
<td>National Drug Code Drug products are identified and reported using a unique, three-segment number, called the National Drug Code (NDC), which serves as a universal product identifier for drugs. FDA publishes the listed NDC numbers and the information submitted as part of the listing information in the NDC.</td>
<td>Field Type: Numeric Note: 11-digit NDC code with no hyphens</td>
</tr>
<tr>
<td>Date of Service</td>
<td>Identifies date the prescription was filled. This date may be outside the reporting period as long as the associated Date of Rejection is after the Date of Service.</td>
<td>Field Type: Date in MM/DD/YYYY Format</td>
</tr>
<tr>
<td>Date of Rejection</td>
<td>Identifies the date the claim was rejected. The Date of Rejection must occur during the reporting period.</td>
<td>Field Type: Date in MM/DD/YYYY Format</td>
</tr>
<tr>
<td>Claim Quantity</td>
<td>Quantity dispensed expressed in metric decimal units.</td>
<td>Field Type: Numeric Allowable Values: &gt;0</td>
</tr>
<tr>
<td>Claim Days Supply</td>
<td>Estimated number of days the prescription will last.</td>
<td>Field Type: Numeric Allowable Values: &gt;0; &lt; 999</td>
</tr>
<tr>
<td>Compound Code</td>
<td>Code indicating whether or not the prescription is a compound.</td>
<td>Field Type: Numeric Allowable Values: 0 = not specified 1 = not a compound 2 = compound</td>
</tr>
<tr>
<td>Rejection Category (1=NF, 2=PA, 3=ST)</td>
<td>Rejection Category: Use category 1 if the rejection is for Non-Formulary drug. Use category 2 if the rejection is for Prior Authorization. Use category 3 if the rejection is for Step Therapy.</td>
<td>Field Type: Numeric Allowable Values: 1=Non-Formulary 2=Prior Authorization 3=Step Therapy</td>
</tr>
<tr>
<td>Reject Code 1</td>
<td>Reject code used in MMP’s claim adjudication system.</td>
<td>Field Type: Alpha-numeric</td>
</tr>
<tr>
<td>Pharmacy Message 1</td>
<td>Reject Message used in MMP’s claim adjudication system.</td>
<td>Field Type: Text</td>
</tr>
<tr>
<td>Reject Code 2</td>
<td>Reject code used in MMP’s claim adjudication system.</td>
<td>Field Type: Alpha-numeric</td>
</tr>
<tr>
<td>Field Name</td>
<td>Field Description</td>
<td>Allowable Values</td>
</tr>
<tr>
<td>---------------------</td>
<td>-----------------------------------------------------------------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>Pharmacy Message 2</td>
<td>Reject Message used in MMP's claim adjudication system.</td>
<td>Field Type: Text</td>
</tr>
<tr>
<td>Reject Code 3</td>
<td>Reject code used in MMP's claim adjudication system.</td>
<td>Field Type: Alpha-numeric</td>
</tr>
<tr>
<td>Pharmacy Message 3</td>
<td>Reject Message used in MMP's claim adjudication system.</td>
<td>Field Type: Text</td>
</tr>
<tr>
<td><em><strong>MMP must provide all reject codes and messaging, not limited to the number of fields in the “Rejected Claims” template. Please insert columns in the “Add'l Reject Codes_Pharmacy Msgs” template as necessary.</strong></em></td>
<td>Provide any additional reject codes and messaging.</td>
<td></td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- An audit of a sample of claims will be performed. Claims not excluded from the analysis will be flagged as “potentially inappropriate.” A sample of up to 30 potentially inappropriate claims will be selected for further review, including: protected class drugs and non-protected class drugs. If at least 15 protected and 15 non-protected class drugs are submitted, 15 protected and 15 non-protected class drugs will be sampled. If fewer than 15 claims are submitted in either drug class, additional claims from the opposing drug class will be selected, until a sample of 30 is reached (e.g., 13 protected and 17 non-protected drugs). If the plan submits fewer than 30 rejected claims, the sample will consist of all submitted rejected claims. MMPs will be required to review claims and address the following:
  - Was this claim was an appropriate Rejection (Y/N).
  - Patient setting (e.g., nursing facility, acute care hospital, etc.).
  - Patient DOB.
  - Provide a brief explanation as to why the claim was appropriate or inappropriate, related to one of the three rejection categories.
  - Was the claim paid (Y/N).
  - If the claim was paid, provide the date the claims was paid for the drug in question.

C. Edits and Validation checks - validation checks that should be performed by each MMP prior to data submission. Any claims that do not pass validation will be excluded from the analysis. These checks will include the following:

- The CMS Contract ID is formatted as 5 alpha-numeric characters.
The CMS Contract ID matches the submitting Contract ID.
The NDC consists of 11 numeric characters.
The NDC is a valid NDC.
The Date of Service is in the MM/DD/YYYY format.
The Date of Rejection is in the MM/DD/YYYY format.
The Date of Rejection is during the reporting period.
The Date of Rejection is on or after the Date of Service.
The Rejection Category is 1, 2, or 3.
The Claim Quantity is greater than zero.
The Claim Days Supply is greater than zero.
The Claim Days Supply is between 1 and 3 numeric characters (1-999).

D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored.

- CMS and the state will calculate an overall score once MMPs have reviewed and provided comments.
- For all class drugs, the number of inappropriate denials (numerator) will be divided by the total number of potentially inappropriate claims sampled (denominator) to calculate an overall rate of inappropriate denials.
- For protected class drugs, the number of inappropriate denials (numerator) will be divided by the total number of potentially inappropriate claims for protected class drugs sampled (denominator) to calculate an overall rate of inappropriate denials.
- For non-protected class drugs, the number of inappropriate denials (numerator) will be divided by the total number of potentially inappropriate claims for non-protected class drugs sampled (denominator) to calculate an overall rate of inappropriate denials.

E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- Reporting timelines are defined in terms of calendar days, not business days. If a reporting due date for Core Measure 1.2 falls on a weekend or holiday, MMPs may submit data on the following business day.
- This measure assesses only the following three denial types: non-formulary, prior authorization, and step therapy.
  - Non-formulary drugs are drugs that are not on an MMP's formulary.
  - Prior Authorization is defined as Approval that a member must get from the MMP before filling a prescription in order for the MMP to cover the prescription. The MMP may require prior authorization for certain drugs.
  - Step Therapy is a coverage rule used by some MMPs that requires a member to try one or more similar, lower cost drugs to treat their condition before the MMP will cover the prescribed drug.
● The reporting period for this measure will begin at the start of the passive enrollment period. Once reporting begins, members should be included regardless of whether the member was enrolled through passive enrollment or opt-in enrollment.
● Passive enrollment periods may vary by state. MMPs should refer to their state’s three-way contract for specific requirements.
● CMS reserves the right to extend the reporting frequency after the first wave of passive enrollment, if necessary.
● MMPs should include all denied claims including adjusted and reprocessed claims, even if repeated claims are attempted on the same day.
● Date of Rejection must occur within the reporting period, but it is acceptable if the Date of Service is outside of the reporting period as long as the Date of Rejection is after the Date of Service.
● Denials ensuing from requests for early refills should be excluded.
● Subsequent 14 day submissions may be necessary for MMPs that meet or exceed the threshold or have an insufficient sample size. MMPs will receive a MMP-specific report indicating whether a MMP passed, failed, or had an insufficient sample size following the full 28 day period. Any MMP that failed or had an insufficient sample size must undergo another round and must submit data during the next wave of passive (unless otherwise directed by the CMT). For MMPs in states with monthly passive enrollment, the MMP must report the last 14 days of the next month of passive. For MMPs with passive that is not month to month, the MMP must submit the first 14 days of the next wave of passive. MMPs that pass the first 28 day period will not need a subsequent round of review.

F. Data Submission - how MMPs will submit data collected to CMS and the state.

● MMPs will submit data collected for this measure in the above specified format through a secure data transmission site established by CMS. This site can be accessed at the following web address:
Section II. Assessment

2.1 Members with an assessment completed within 90 days of enrollment.¹

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Periods</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Assessment</td>
<td>Monthly during the implementation period, beginning after 90 days of implementation</td>
<td>Contract</td>
<td>Current Calendar Month Ex: 1/1 – 1/31</td>
<td>By the end of the month following the last day of the reporting period</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Ex: Demo implementation is January 1, 2018; 90 days after enrollment is March 31, 2018; first report is due by April 30, 2018; the next report would be due May 31, 2018</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Periods</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Assessment</td>
<td>Quarterly</td>
<td>Contract</td>
<td>Current Calendar Quarter Ex: 1/1-3/31, 4/1-6/30, 7/1-9/30, 10/1-12/31</td>
<td>By the end of the second month following the last day of the reporting period</td>
</tr>
</tbody>
</table>

¹ Ex: Demo implementation is January 1, 2018; 90 days after enrollment is March 31, 2018; first report is due by April 30, 2018; the next report would be due May 31, 2018.
A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of members whose 90th day of enrollment occurred within the reporting period and who were currently enrolled at the end of the reporting period.</td>
<td>Total number of members whose 90th day of enrollment occurred within the reporting period and who were currently enrolled at the end of the reporting period.</td>
<td>Field type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of members who were documented as unwilling to participate in the assessment within 90 days of enrollment.</td>
<td>Of the total reported in A, the number of members who were documented as unwilling to participate in the assessment and who never had an assessment completed within 90 days of enrollment.</td>
<td>Field Type: Numeric Note: Is a subset of A. Unwillingness to participate must be clearly documented.</td>
</tr>
<tr>
<td>C.</td>
<td>Total number of members the MMP was unable to reach, following three documented outreach attempts, to participate in the assessment within 90 days of enrollment.</td>
<td>Of the total reported in A, the number of members the MMP was unable to reach, following three documented outreach attempts, to participate in the assessment and who never had an assessment completed within 90 days of enrollment.</td>
<td>Field type: Numeric Note: Is a subset of A. Three outreach attempts must be clearly documented.</td>
</tr>
<tr>
<td>D.</td>
<td>Total number of members with an assessment completed within 90 days of enrollment.</td>
<td>Of the total reported in A, the number of members with an assessment completed within 90 days of enrollment.</td>
<td>Field type: Numeric Note: Is a subset of A. Completed assessments must be clearly documented.</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.
C. Edits and Validation checks - validation checks that should be performed by each MMP prior to data submission.

- Confirm those data elements listed above as subsets of other elements.
- MMPs should validate that the sum of data elements B, C, and D is less than or equal to data element A.
- MMPs should validate that members included in data element A were enrolled for at least 90 days and the 90th day of enrollment occurred within the reporting period.
- MMPs should validate that members included in data element A were enrolled as of the last day of the reporting period.
- MMPs should validate that members included in data element B were included in data element A.
- MMPs should validate that members included in data element C were included in data element A.
- MMPs should validate that members included in data element D were included in data element A.
- MMPs should validate that members reported in data element B were not reported in data elements C or D.
- MMPs should validate that members reported in data element C were not reported in data elements B or D.
- MMPs should validate that members reported in data element D were not reported in data elements B or C.
- MMPs should validate that members reported in data element B were clearly documented as unwilling to participate in the assessment within 90 days of enrollment.
- MMPs should validate that members reported in data element C had three outreach attempts clearly documented within 90 days of enrollment.
- MMPs should validate that members reported in data element D had a completed assessment clearly documented within 90 days of enrollment.
- All data elements should be positive values.

D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will evaluate the percentage of:

- Members who were documented as unwilling to participate in the assessment and who never had an assessment completed within 90 days of enrollment.
- Members the MMP was unable to reach, following three documented outreach attempts, to participate in the assessment and who never had an assessment completed within 90 days of enrollment.
- Members who had an assessment completed within 90 days of enrollment.
- Members who were willing to participate and who could be reached who had an assessment completed within 90 days of enrollment (i.e., data element A minus data elements B and C will serve as the denominator).
E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- MMPs should include all members regardless of whether the member was enrolled through passive enrollment or opt-in enrollment. Medicaid-only members should not be included.
- MMPs should only include those members who are currently enrolled as of the last day of the reporting period. The last day of the reporting period is the anchor date, or the date on which all reported members must be enrolled in the MMP.
- The 90th day of enrollment should be based on each member’s effective date of Medicare-Medicaid enrollment. For the purposes of reporting this measure, 90 days of enrollment will be equivalent to three full calendar months. The 90th day of enrollment will always occur on the last day of the third month following a member’s effective enrollment date. When reporting quarterly results for Ongoing reporting periods, MMPs should report all members who reached their 90th day of enrollment at any point during the three months included in the quarter (e.g., members enrolled on May 1, June 1, and July 1 reached their 90th day of enrollment during the third quarter; therefore, these members should be included in Ongoing reporting for the third quarter as long as they were still enrolled on the last day of the reporting period).
- Members reported in data elements B, C, and D must also be reported in data element A since these data elements are subsets of data element A. Additionally, data elements B, C, and D should be mutually exclusive (e.g. a member reported in data element B or C should not also be reported in data element D). If a member could meet the criteria for multiple data elements (B, C, or D) use the following guidance to ensure the member is included in only one of those three elements:
  - If a member initially refused the assessment or could not be reached after three outreach attempts, but then subsequently completes the assessment within 90 days of enrollment, the member should be classified in data element D.
  - If a member was not reached after three outreach attempts, but then subsequently is reached and refuses the assessment within 90 days of enrollment, the member should be classified in data element B.
- MMPs should only report members with an initial assessment for this measure. For reporting of members with an annual reassessment, refer to Core Measure 2.3.
- The assessment for this measure should be the comprehensive health risk assessment as applicable per state-specific guidance. The requirements pertaining to the assessment tool and how the tool should be administered (e.g., in-person, phone, etc.) may vary by state. The assessment tool should meet any state-specific criteria and include the appropriate domains as determined by the state. MMPs should refer to their state’s three-way contract for specific requirements.
Additional guidance is included in the state-specific reporting appendices. MMPs should refer to their state’s reporting appendix for information on reporting assessments completed by the MMP prior to a member’s effective enrollment date, reporting assessments for members with a break in coverage, and reporting assessments completed previously by the MMP’s affiliated product. Note that the applicability of such guidance varies across states.

For data element B, MMPs should report the number of members who were documented as unwilling to participate in the assessment if a member (or his or her authorized representative):
  ○ Affirmatively declines to participate in the assessment, affirmatively declines care management activities overall, or refuses any contact with the MMP. Member communicates the declination or refusal by phone, mail, fax, or in person. The declination must be documented by the MMP.
  ○ Expresses willingness to complete the assessment but asks for it to be conducted after 90 days (despite being offered a reasonable opportunity to complete the assessment within 90 days). Discussions with the member must be documented by the MMP.
  ○ Expresses willingness to complete the assessment, but reschedules or is a no-show and then is subsequently non-responsive. Attempts to contact the member must be documented by the MMP.
  ○ Initially agrees to complete the assessment, but then declines to answer a majority of the questions in the assessment. The declination must be documented by the MMP.

For data element C, MMPs should report the number of members the MMP was unable to reach after three documented attempts to contact the member. MMPs should refer to their state’s three-way contract or state guidance for any specific requirements pertaining to the method of outreach to members. MMPs must document each attempt to reach the member, including the method of the attempt (e.g., phone, mail, or email), as CMS and the state may validate this number. If less than three outreach attempts are made to the member within 90 days of enrollment, the member should not be included in data element C.
  ○ Note that the applicable three-way contract may require more than three outreach attempts. MMPs must continue to follow such contract requirements; however, for purposes of reporting this measure, MMPs may count a member under data element C following three outreach attempts.

There may be instances when the MMP has a high degree of confidence that a member’s contact information is correct, yet that member is not responsive to the MMP’s outreach efforts. So long as the MMP follows the guidance regarding outreach attempts, these members may be included in the count for data element C.

There may be certain circumstances that make it impossible or inappropriate to complete an assessment within the required timeframes. For example, a member may be medically unable to respond and have no authorized representative to do so on their behalf, or a member may be experiencing an acute medical or behavioral health crisis that requires immediate attention and outweighs the need for an assessment. However, MMPs should not include such members in the counts for data elements B or C.
If a member’s assessment is in progress, but is not completed within 90 days of enrollment, then the assessment should not be considered completed, and therefore, the member should not be counted in data element D.

For additional guidance on identifying each data element, including examples and scenarios for correctly reporting members who may meet the criteria for multiple data elements, please reference the Core 2.1 FAQ document located on the CMS website: https://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/InformationandGuidanceforPlans.html

F. Data Submission - how MMPs will submit data collected to CMS and the state.

- MMPs will submit data collected for this measure through the Health Plan Management System (HPMS).

## IMPLEMENTATION

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Periods</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Assessment</td>
<td>Monthly</td>
<td>Contract</td>
<td>Current Calendar Month</td>
<td>By the end of the month following the last day of the reporting period</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Ex: 1/1 – 1/31</td>
<td></td>
</tr>
</tbody>
</table>

### A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of members with an assessment completed within the reporting period.</td>
<td>Total number of members with an assessment completed within the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of members enrolled for 90 days or longer as of the last day of the reporting period.</td>
<td>Total number of members enrolled for 90 days or longer as of the last day of the reporting period.</td>
<td>Field type: Numeric Note: This data element should not be reported until 90 days after implementation.</td>
</tr>
<tr>
<td>Element Letter</td>
<td>Element Name</td>
<td>Definition</td>
<td>Allowable Values</td>
</tr>
<tr>
<td>----------------</td>
<td>------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>C.</td>
<td>Total number of members enrolled for 90 days or longer who had an assessment completed.</td>
<td>Of the total reported in B, the number of members enrolled for 90 days or longer who had an assessment completed.</td>
<td>Field type: Numeric Note: Is a subset of B. Note: This data element should not be reported until 90 days after implementation.</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.

C. Edits and Validation checks - validation checks that should be performed by each MMP prior to data submission.

- Confirm those data elements listed above as subsets of other elements.
- MMPs should validate that data element C is less than or equal to data element B.
- All data elements should be positive values.

D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will use enrollment data to evaluate the percentage of members:

- Who had an assessment completed within the reporting period.
- Enrolled for 90 days or longer as of the last day of the reporting period who had an assessment completed.

E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- MMPs should include all members regardless of whether the member was enrolled through passive enrollment or opt-in enrollment. Medicaid-only members should not be included.
- MMPs should include all members who meet the criteria outlined in data element A, regardless if they are disenrolled as of the end of the reporting period (i.e., include all members regardless if they are currently enrolled or disenrolled as of the last day of the reporting period).
The 90th day of enrollment should be based on each member’s effective date of enrollment. For the purposes of reporting this measure, 90 days of enrollment will be equivalent to three full calendar months.

The effective date of enrollment is the first date of the member’s coverage through the MMP.

MMPs should only report members with an initial assessment for this measure. For reporting of members with an annual reassessment, refer to Core Measure 2.3.

The assessment for this measure should be the comprehensive health risk assessment as applicable per state-specific guidance. The requirements pertaining to the assessment tool and how the tool should be administered (e.g., in-person, phone, etc.) may vary by state. The assessment tool should meet any state-specific criteria and include the appropriate domains as determined by the state. MMPs should refer to their state’s three-way contract for specific requirements.

Data element A will be reported after the first month following the beginning of the Implementation period, whereas data elements B and C will not be reported until after 90 days.

The members reported in data element C could have had an assessment completed at any time, not necessarily during the reporting period.

F. Data Submission - how MMPs will submit data collected to CMS and the state.

MMPs will submit data collected for this measure through the Health Plan Management System (HPMS).

### 2.3 Members with an annual reassessment.

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Period</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Assessment</td>
<td>Annually</td>
<td>Contract</td>
<td>Calendar Year, beginning CY2</td>
<td>By the end of the second month following the last day of the reporting period</td>
</tr>
</tbody>
</table>

A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.
<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Total number of members enrolled as of the last day of the current reporting</td>
<td>Total number of members enrolled as of the last day of the current reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td>period.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B</td>
<td>Total number of members who had an assessment completed during the previous</td>
<td>Of the total reported in A, the number of members who had an assessment completed during the previous reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td>reporting period.</td>
<td></td>
<td>Note: Is a subset of A.</td>
</tr>
<tr>
<td>C</td>
<td>Total number of members with a reassessment completed during the current</td>
<td>Of the total reported in B, the number of members who had a reassessment completed during the current reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td>reporting period.</td>
<td></td>
<td>Note: Is a subset of B.</td>
</tr>
<tr>
<td>D</td>
<td>Total number of members with a reassessment completed within 365 days of the</td>
<td>Of the total reported in C, the number of members with a reassessment completed during the current reporting period that occurred within 365 days of the most recent assessment completed during the previous reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td>most recent assessment completed.</td>
<td></td>
<td>Note: Is a subset of C.</td>
</tr>
<tr>
<td>E</td>
<td>Total number of members who did not have an assessment completed during the</td>
<td>Of the total reported in A, the number of members enrolled for at least 90 days during the previous reporting period who did not have an assessment completed during the previous reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td>previous reporting period.</td>
<td></td>
<td>Note: Is a subset of A.</td>
</tr>
<tr>
<td>F</td>
<td>Total number of members with an assessment completed during the current</td>
<td>Of the total reported in E, the number of members who had an assessment completed during the current reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td>reporting period.</td>
<td></td>
<td>Note: Is a subset of E.</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.
C. Edits and Validation checks - validation checks that should be performed by each MMP prior to data submission.

- Confirm those data elements listed above as subsets of other elements.
- MMPs should validate that data elements B and E are less than or equal to data element A.
- MMPs should validate that data element C is less than or equal to data element B.
- MMPs should validate that data element D is less than or equal to data element C.
- MMPs should validate that data element F is less than or equal to data element E.
- All data elements should be positive values.

D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will evaluate the percentage of members who:

- Had an assessment completed during the previous reporting period who had a reassessment completed during the current reporting period.
- Had a reassessment completed during the current reporting period that was within 365 days of the most recent assessment completed during the previous reporting period.
- Were enrolled for at least 90 days during the previous reporting period who did not have an assessment completed during the previous reporting period but had an assessment completed during the current reporting period.

E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- MMPs should include all members regardless of whether the member was enrolled through passive enrollment or opt-in enrollment. Medicaid-only members should not be included.
- MMPs should only include members who are still enrolled as of the last day of the current reporting period.
- The assessment for this measure should be the comprehensive health risk assessment as applicable per state-specific guidance. The requirements pertaining to the assessment tool and how the tool should be administered (e.g., in-person, phone, etc.) may vary by state. The assessment tool should meet any state-specific criteria and include the appropriate domains as determined by the state. MMPs should refer to their state’s three-way contract for specific requirements.
- For purposes of reporting this measure, 365 days will be equivalent to one full year. Additionally, 90 days of enrollment will be equivalent to three full calendar months.
• For reporting all data elements, MMPs should report unduplicated counts of members meeting the criteria for each element. Members with more than one assessment or reassessment completed during a reporting period should be reported only once in the relevant data elements.
• For reporting data element B, include all members who were enrolled as of the last day of the current reporting period who received an assessment (initial or reassessment) during the previous reporting period.
• For reporting data element C, include all members reported in data element B who had a reassessment completed at any time during the current reporting period.
• For reporting data element D, include all members reported in data element C who had a reassessment completed during the current reporting period that was completed within 365 days of the date of the member’s most recent assessment (initial or reassessment) completed during the previous reporting period. For example, if a member was assessed twice during CY2017, first on May 15, 2017 and again on October 15, 2017, count 365 days continuously from October 15, 2017 to determine if a reassessment occurred within 365 days. In this example, if the member completes a reassessment on September 15, 2018, they would be included in data element D for CY2018 reporting. Conversely, if the member’s reassessment was not completed until November 15, 2018, they would not be included in data element D for CY2018 reporting. In either case, the member would be captured in data element C.
• For members who disenroll and reenroll in the MMP, MMPs should count 365 days continuously from the member’s most recent assessment date within the previous reporting period, even if that assessment was conducted during the member’s prior enrollment period.
• For reporting data element E, include all members who were enrolled as of the last day of the current reporting period, who were enrolled for at least 90 days during the previous reporting period who did not receive an assessment (initial or reassessment) during the previous reporting period.
  ○ For members who disenroll and reenroll in the MMP, MMPs should include members that had any continuous enrollment of 90 days or more in the previous year, even if that enrollment preceded a break in coverage by the MMP.
• For reporting data element F, include all members reported in data element E who had an assessment completed at any time during the current reporting period.
• This measure will not be reported until Calendar Year 2.
• The term “current reporting period” in data elements A, C, D and F refers to the current calendar year. The term “previous reporting period” in elements B, D, and E refers to the prior calendar year.

F. Data Submission - how MMPs will submit data collected to CMS and the state.

• MMPs will submit data collected for this measure through the Health Plan Management System (HPMS).
Section III. Care Coordination

3.1 Members, regardless of age, discharged from an inpatient facility to home or any other site of care for whom a transition record was transmitted within 24 hours of discharge to the facility or primary care provider or other health care professional designated for follow-up care. (modified from NQF #0648) – Retired

3.2 Members with a care plan completed within 90 days of enrollment.

| IMPLEMENTATION |
|-----------------|-----------------|-----------------|-----------------|-----------------|
| Reporting Section | Reporting Frequency | Level | Reporting Periods | Due Date |
| 3. Care Coordination | Monthly during the implementation period, beginning after 90 days of implementation | Contract | Current Calendar Month Ex: 1/1-1/31 | By the end of the month following the last day of the reporting period Ex: Demo implementation is January 1, 2018; 90 days after enrollment is March 31, 2018; first report is due by April 30, 2018; the next report would be due May 31, 2018 |

| ONGOING |
|-----------------|-----------------|-----------------|-----------------|-----------------|
| Reporting Section | Reporting Frequency | Level | Reporting Periods | Due Date |
| 3. Care Coordination | Quarterly | Contract | Current Calendar Quarter Ex: 1/1-3/31 4/1-6/30 7/1-9/30 10/1-12/31 | By the end of the second month following the last day of the reporting period |

A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.
### Element Letters

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Total number of members whose 90th day of enrollment occurred within the-reporting period and who were currently enrolled at the end of the reporting period.</td>
<td>Total number of members whose 90th day of enrollment occurred within the reporting period and who were currently enrolled at the end of the reporting period.</td>
<td>Field type: Numeric</td>
</tr>
<tr>
<td>B</td>
<td>Total number of members who were documented as unwilling to complete a care plan within 90 days of enrollment.</td>
<td>Of the total reported in A, the number of members who were documented as unwilling to complete a care plan and who never had a care plan completed within 90 days of enrollment.</td>
<td>Field Type: Numeric Note: Is a subset of A. Unwillingness to participate must be clearly documented.</td>
</tr>
<tr>
<td>C</td>
<td>Total number of members the MMP was unable to reach, following three documented outreach attempts, to complete a care plan within 90 days of enrollment.</td>
<td>Of the total reported in A, the number of members the MMP was unable to reach, following three documented outreach attempts, to complete a care plan and who never had a care plan completed within 90 days of enrollment.</td>
<td>Field type: Numeric Note: Is a subset of A. Three outreach attempts must be clearly documented.</td>
</tr>
<tr>
<td>D</td>
<td>Total number of members with a care plan completed within 90 days of enrollment.</td>
<td>Of the total reported in A, the number of members with a care plan completed within 90 days of enrollment.</td>
<td>Field type: Numeric Note: Is a subset of A. Completed care plans must be clearly documented.</td>
</tr>
</tbody>
</table>

### B. QA Checks/Thresholds

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.
C. Edits and Validation checks - validation checks that should be performed by each MMP prior to data submission.

- Confirm those data elements listed above as subsets of other elements.
- MMPs should validate that the sum of data elements B, C, and D are less than or equal to data element A.
- MMPs should validate that members included in data element A were enrolled for at least 90 days and the 90th day of enrollment occurred within the reporting period.
- MMPs should validate that members included in data element A were enrolled as of the last day of the reporting period.
- MMPs should validate that members included in data element B were included in data element A.
- MMPs should validate that members included in data element C were included in data element A.
- MMPs should validate that members included in data element D were included in data element A.
- MMPs should validate that members reported in data element B were not reported in data elements C or D.
- MMPs should validate that members reported in data element C were not reported in data elements B or D.
- MMPs should validate that members reported in data element D were not reported in data elements B or C.
- MMPs should validate that members reported in data element B were clearly documented as unwilling to complete the care plan within 90 days of enrollment.
- MMPs should validate that members reported in data element C had three outreach attempts clearly documented within 90 days of enrollment.
- MMPs should validate that members reported in data element D had a completed care plan clearly documented within 90 days of enrollment.
- All data elements should be positive values.

D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will evaluate the percentage of:

- Members who were documented as unwilling to complete a care plan and who never had a care plan completed within 90 days of enrollment.
- Members the MMP was unable to reach following three documented outreach attempts to complete a care plan and who never had a care plan completed within 90 days of enrollment.
- Members who had a care plan completed within 90 days of enrollment.
- Members who were willing to participate and who could be reached who had a care plan completed within 90 days of enrollment (i.e., data element A minus data elements B and C will serve as the denominator).
E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- MMPs should include all members regardless of whether the member was enrolled through passive enrollment or opt-in enrollment. Medicaid-only members should not be included.
- MMPs should only include those members who are currently enrolled as of the last day of the reporting period. The last day of the reporting period is the anchor date, or the date on which all reported members must be enrolled in the MMP.
- The 90th day of enrollment should be based on each member’s effective date of Medicare-Medicaid enrollment. For the purposes of reporting this measure, 90 days of enrollment will be equivalent to three full calendar months. The 90th day of enrollment will always occur on the last day of the third month following a member’s effective enrollment date. When reporting quarterly results from Ongoing reporting periods, MMPs should report all members who reached their 90th day of enrollment at any point during the three months included in the quarter (e.g., members enrolled on May 1, June 1, and July 1 reached their 90th day of enrollment during the third quarter; therefore, these members should be included in Ongoing reporting for the third quarter as long as they were still enrolled on the last day of the reporting period).
- Members reported in data elements B, C, and D must also be reported in data element A since these data elements are subsets of data element A. Additionally, data elements B, C, and D should be mutually exclusive (e.g., a member reported in data element B or C should not also be reported in data element D). If a member could meet the criteria for multiple data elements (B, C, or D) use the following guidance to ensure the member is included in only one of those three elements:
  ○ If a member initially refused to complete a care plan or could not be reached after three outreach attempts, but then subsequently completes a care plan within 90 days of enrollment, the member should be classified in data element D.
  ○ If a member could not be reached after three outreach attempts, but then subsequently is reached and refuses to complete a care plan within 90 days of enrollment, the member should be classified in data element B.
- MMPs should only report members with an initial care plan for this measure.
- The requirements for care plan development may vary by state. The care plan should meet any state-specific criteria and include the appropriate domains as determined by the state. MMPs should refer to their state’s three-way contract for specific requirements.
- Additional guidance is included in the state-specific reporting appendices. MMPs should refer to their state’s reporting appendix for information on reporting care plans completed by the MMP prior to a member’s effective enrollment date, reporting care plans for members with a break in coverage, and reporting care plans completed previously by the MMP’s affiliated product. Note that the applicability of such guidance varies across states.
For data element B, MMPs should report the number of members who were documented as unwilling to complete a care plan if a member (or his or her authorized representative):

- Affirmatively declines to complete the care plan, affirmatively declines care management activities overall, or refuses any communication with the MMP. Member communicates this declination or refusal by phone, mail, fax, or in person. The declination must be documented by the MMP.
- Expresses willingness to complete the care plan but asks for it to be conducted after 90 days (despite being offered a reasonable opportunity to complete the care plan within 90 days). Discussions with the member must be documented by the MMP.
- Expresses willingness to complete the care plan, but reschedules or is a no-show and then is subsequently non-responsive. Attempts to contact the member must be documented by the MMP.
- Initially agrees to complete the care plan, but then declines to participate in the development of the care plan. The declination must be documented by the MMP.

For data element C, MMPs should report the number of members the MMP was unable to reach after three documented attempts to contact the member. The three documented outreach attempts to contact the member should have been specific to the completion of the care plan.

- If an MMP was previously unable to reach a member for the purpose of completing an assessment and has documented three unsuccessful outreach attempts, the MMP is not expected to make additional outreach attempts about the completion of a care plan. The MMP would report this member in data element C.
- If an MMP was previously able to reach a member for the purpose of completing an assessment, at least three new and distinct outreach attempts for the purpose of completing the care plan must be made and documented.

MMPs should refer to their state’s three-way contract or state guidance for any specific requirements pertaining to the method of outreach to members. MMPs must document each attempt to reach the member, including the method of the attempt (e.g., phone, mail, or email), as CMS and the state may validate this number. If less than three outreach attempts are made to the member within 90 days of enrollment, the member should not be included in data element C.

- Note that the applicable three-way contract may require more than three outreach attempts. MMPs must continue to follow such contract requirements; however, for purposes of reporting this measure, MMPs may count a member under data element C following three outreach attempts.

There may be instances when the MMP has a high degree of confidence that a member’s contact information is correct, yet that member is not responsive to the MMP’s outreach efforts. So long as the MMP follows the guidance regarding outreach attempts, these members may be included in the count for data element C.
There may be certain circumstances that make it impossible or inappropriate to complete a care plan within the required timeframes. For example, a member may be medically unable to participate and have no authorized representative to do so on their behalf, or a member may be experiencing an acute medical or behavioral health crisis that requires immediate attention and outweighs the need for a care plan. However, MMPs should not include such members in the counts for data elements B or C.

- If a member's care plan is in progress, but is not completed within 90 days of enrollment, then the care plan should not be considered completed, and therefore, the member should not be counted in data element D.
- MMPs should only report completed care plans where the member or the member's authorized representative was involved in the development of the care plan.

**F. Data Submission - how MMPs will submit data collected to CMS and the state.**

- MMPs will submit data collected for this measure through the Health Plan Management System (HPMS).
Section IV. Enrollee Protections

4.1 Part D appeals. – **Retired**; See Part D Reporting Requirements Section VI – Coverage Determinations and Redeterminations for required reporting.

4.2 Grievances and Appeals.

| IMPLEMENTATION |
|-----------------|-----------------|-----------------|-----------------|-----------------|
| Reporting Section | Reporting Frequency | Level | Reporting Periods | Due Date |
| 4. Enrollee Protections | Monthly | Contract | Current Calendar Month Ex: 1/1 – 1/31 | By the end of the month following the last day of the reporting period |

| ONGOING |
|-----------------|-----------------|-----------------|-----------------|-----------------|
| Reporting Section | Reporting Frequency | Level | Reporting Periods | Due Date |
| 4. Enrollee Protections | Annually | Contract | Calendar Quarters Ex: 1/1-3/31 4/1-6/30 7/1-9/30 10/1-12/31 | By the end of the second month following the last day of the final quarterly reporting period |

Note: Plans should report all non-Part D (i.e., Part C, Medicaid, and supplemental benefit) grievances and appeals for data elements A-S, in addition to reporting the already required Medicare Part C and D appeals and grievances as follows:

- Part D grievances are reported according to Part D reporting requirements (see Part D Section IV Grievances);
- Part D appeals are reported according to Part D reporting requirements (see Part D Section VI Coverage Determinations and Redeterminations);
- Part C grievances are also reported through Part C reporting requirements (see Part C Section V Grievances); and
- Part C appeals are also reported through Part C reporting requirements (see Part C Section VI Organization Determinations/Reconsiderations).

Medicare Part D Reporting Requirements can be found on the CMS website at: [https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/RxContracting_ReportingOversight.html](https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/RxContracting_ReportingOversight.html).
Medicare Part C Reporting Requirements can be found on the CMS website at:

A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

**Grievances**

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total Grievances – Total number of grievances.</td>
<td>Total number of grievances for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Grievance Timeless – Total number of grievances for which the MMP provided timely notification of its decision.</td>
<td>Of the total reported in A, the number of grievances for which the MMP provided timely notification of its decision during the reporting period.</td>
<td>Field Type: Numeric. Is a subset of A.</td>
</tr>
<tr>
<td>C.</td>
<td>Grievance Category – Total number of grievances related to access to care.</td>
<td>Of the total reported in A, the number of grievances related to access to care for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric. Is a subset of A.</td>
</tr>
<tr>
<td>D.</td>
<td>Grievance Category – Total number of grievances related to transportation.</td>
<td>Of the total reported in A, the number of grievances related to transportation for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric. Is a subset of A.</td>
</tr>
<tr>
<td>E.</td>
<td>Grievance Category – Total number of grievances related to billing.</td>
<td>Of the total reported in A, the number of grievances related to billing for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric. Is a subset of A.</td>
</tr>
<tr>
<td>Element Letter</td>
<td>Element Name</td>
<td>Definition</td>
<td>Allowable Values</td>
</tr>
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<td>----------------</td>
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<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>F.</td>
<td>Grievance Category – Total number of grievances related to home health/personal care.</td>
<td>Of the total reported in A, the number of grievances related to home health/personal care for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric. Is a subset of A.</td>
</tr>
<tr>
<td>G.</td>
<td>Grievance Category – Total number of other grievances not related to categories mentioned above.</td>
<td>Of the total reported in A, the number of other grievances not related to categories mentioned above for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric. Is a subset of A.</td>
</tr>
</tbody>
</table>

**Appeals**

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>H.</td>
<td>Total Appeals – Total number of appeals.</td>
<td>Total number of appeals for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric.</td>
</tr>
<tr>
<td>I.</td>
<td>Appeal Timeliness – Total number of appeals for which the MMP provided timely notification of its decision.</td>
<td>Of the total reported in H, the number of appeals for which the MMP provided timely notification of its decision during the reporting period.</td>
<td>Field Type: Numeric. Is a subset of H.</td>
</tr>
<tr>
<td>J.</td>
<td>Appeal Decision – Total number of appeals for which the MMP’s decision was fully favorable.</td>
<td>Of the total reported in H, the number of appeals for which the MMP provided notification of a fully favorable decision within the reporting period.</td>
<td>Field Type: Numeric. Is a subset of H.</td>
</tr>
<tr>
<td>Element Letter</td>
<td>Element Name</td>
<td>Definition</td>
<td>Allowable Values</td>
</tr>
<tr>
<td>---------------</td>
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<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------</td>
</tr>
<tr>
<td>K.</td>
<td>Appeal Decision – Total number of appeals for which the MMP’s decision was partially favorable.</td>
<td>Of the total reported in H, the number of appeals for which the MMP provided notification of a partially favorable decision within the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is a subset of H.</td>
<td></td>
</tr>
<tr>
<td>L.</td>
<td>Appeal Decision – Total number of appeals for which the MMP’s decision was adverse.</td>
<td>Of the total reported in H, the number of appeals for which the MMP provided notification of an adverse decision within the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is a subset of H.</td>
<td></td>
</tr>
<tr>
<td>M.</td>
<td>Appeal Category – Total number of appeals related to denial or limited authorization of specialty services.</td>
<td>Of the total reported in H, the number of appeals related to denial or limited authorization of specialty services for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is a subset of H.</td>
<td></td>
</tr>
<tr>
<td>N.</td>
<td>Appeal Category – Total number of appeals related to denial or limited authorization of HCBS services.</td>
<td>Of the total reported in H, the number of appeals related to denial or limited authorization of HCBS services for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is a subset of H.</td>
<td></td>
</tr>
<tr>
<td>O.</td>
<td>Appeal Category – Total number of appeals related to denial or limited authorization of institutional services.</td>
<td>Of the total reported in H, the number of appeals related to denial or limited authorization of institutional services for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is a subset of H.</td>
<td></td>
</tr>
<tr>
<td>Element Letter</td>
<td>Element Name</td>
<td>Definition</td>
<td>Allowable Values</td>
</tr>
<tr>
<td>----------------</td>
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</tr>
<tr>
<td>P.</td>
<td>Appeal Category – Total number of appeals related to denial or limited authorization of mental health services.</td>
<td>Of the total reported in H, the number of appeals related to denial or limited authorization of mental health services for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric Is a subset of H.</td>
</tr>
<tr>
<td>Q.</td>
<td>Appeal Category – Total number of appeals related to denial or limited authorization of substance use treatment services.</td>
<td>Of the total reported in H, the number of appeals related to denial or limited authorization of substance use treatment services for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric Is a subset of H.</td>
</tr>
<tr>
<td>R.</td>
<td>Appeal Category – Total number of post-service payment appeals.</td>
<td>Of the total reported in H, the number of post-service payment appeals for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric Is a subset of H.</td>
</tr>
<tr>
<td>S.</td>
<td>Appeal Category – Total number of other appeals not related to categories mentioned above.</td>
<td>Of the total reported in H, the number of other appeals not related to categories mentioned above for which the MMP provided notification of its decision during the reporting period.</td>
<td>Field Type: Numeric Is a subset of H.</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.
C. Edits and Validation Checks - validation checks that should be performed by each MMP prior to data submission.

- Confirm those data elements listed above as subsets of the other elements.
- MMPs should validate that the sum of data elements C, D, E, F and G is equal to data element A.
- MMPs should validate that the sum of data elements J, K and L is equal to data element H.
- MMPs should validate that the sum of data elements M, N, O, P, Q, R and S is equal to data element H.
- All data elements should be positive values.

D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will use enrollment information to evaluate the following:

- Total number of grievances per 10,000 member months.
- Percent of grievances for which the MMP provided timely notification of its decision.
- Total number of grievances related to:
  - Access to care per 10,000 member months.
  - Transportation per 10,000 member months.
  - Billing per 10,000 member months.
  - Home health/personal care per 10,000 member months.
  - Other grievances per 10,000 member months.
- Total number of appeals per 10,000 member months.
- Percent of appeals for which the MMP provided timely notification of its decision
- Percent of appeals for which the MMP’s decision was fully favorable.
- Percent of appeals for which the MMP’s decision was partially favorable.
- Percent of appeals for which the MMP’s decision was adverse.
- Total number of appeals related to:
  - Denial or limited authorization of specialty services per 10,000 member months.
  - Denial or limited authorization of HCBS services per 10,000 member months.
  - Denial or limited authorization of institutional services per 10,000 member months.
  - Denial or limited authorization of mental health services per 10,000 member months.
  - Denial or limited authorization of substance abuse treatment services per 10,000 member months.
  - Post service payment appeals per 10,000 member months.
  - Other appeals per 10,000 member months.
E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- As noted above, MMPs should report all non-Part D (i.e., Part C, Medicaid, and supplemental benefit) grievances and appeals under this measure.
- There are no minimum enrollment criteria for this measure. All grievances and appeals should be reported regardless of how long a member has been enrolled in the MMP or if he/she has disenrolled from the MMP prior to the end of the reporting period.
- The date the MMP notified the member of its decision should be used to assess which reporting period the grievance or appeal should be reported within. For example, if a grievance was received on March 24 and the MMP provided notification of its decision on April 4, then the grievance would be included in the second quarter when reporting this measure.
- MMPs should refer to their state’s three-way contract for definitions of timely grievance and appeal resolution for purposes of reporting data elements B and I.
- A grievance involving multiple issues should be reported under each applicable category and also counted the corresponding number of times under data element A. For example, if the MMP receives a grievance that involves two issues – access to care and billing – the grievance would be reported under both data elements C and E and reported twice under data element A.
- If a member files a grievance and then files a subsequent grievance on the same issue prior to the MMP’s decision or deadline for decision notification (whichever is earlier), the issue is counted as one grievance.
- If a member files a grievance and then files a subsequent grievance on the same issue after the MMP’s decision or deadline for decision notification (whichever is earlier), the issue is counted as a separate grievance.
- MMPs should include oral grievances, even if the oral grievance was resolved during the call.
- MMPs should exclude withdrawn grievances and grievances only made through the CMS Complaints Tracking Module.
- Access to care grievances reported in data element C should include grievances related to inability to get an appointment with a provider, excessive wait times for an appointment with a provider, inability to access a provider who demonstrates cultural competency, inability to access a provider who can communicate with the member in his/her primary language or via a translation service, and inability to access a provider that offers sufficient accommodations for the member’s disability. Note that this category does not include grievances related to transportation used to access providers, as those grievances would be reported under data element D.
- Home health/personal care grievances reported in data element F should include all grievances related to home health/personal care benefits, such as (but not limited to) issues with the demeanor of the home health/personal care aide, tardiness/absenteeism from the home health/personal care aide, and quality of home health/personal care provided.
- Only appeals decided by the MMP should be included in the measure (i.e., do not include appeal decisions made by the Independent Review Entity, Quality Improvement Organization, and/or state fair hearing agency).
- For data elements M through Q, appeals related to the denial or limited authorization of a service should also include reductions, suspensions, or terminations of a previously authorized service.
- For data element M, specialty services are defined as any service or medical care provided or directed by a “specialist” (as opposed to a Primary Care Provider) that would not be a service offered by a Primary Care Provider or fitting into another category. Note: Specialty service providers should include occupational/physical/speech therapy, dental, vision, transportation, and durable medical equipment. Primary Care Provider will be defined in the state-specific appendix.
- For data element R, MMPs should include all payment disputes (i.e., requests for payment and requests for adjustment to the paid amount), regardless if the appeal is made by the beneficiary (or his/her authorized representative), or a contracted or non-contracted provider. Duplicate payment appeals should be counted only once.

F. Data Submission - how MMPs will submit data collected to CMS and the state.

- MMPs will submit data collected for this measure through the Health Plan Management System (HPMS).
Section V. Organizational Structure and Staffing

5.1 Care coordinator to member ratio.

| IMPLEMENTATION |
|-----------------|-----------------|-----------------|-----------------|-----------------|
| Reporting Section | Reporting Frequency | Level     | Reporting Periods                          | Due Date                        |
| 5. Organizational Structure and Staffing | Quarterly       | Contract     | Current Calendar Quarter                   | By the end of the second month following the last day of the reporting period |
|                        |                  |             | Ex: 1/1-3/31 4/1-6/30 7/1-9/30 10/1-12/31 |                               |

| ONGOING |
|-----------------|-----------------|-----------------|-----------------|-----------------|
| Reporting Section | Reporting Frequency | Level     | Reporting Period                          | Due Date                        |
| 5. Organizational Structure and Staffing | Annually       | Contract     | Calendar Year                                   | By the end of the second month following the last day of the reporting period |

A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of full time equivalent (FTE) care coordinators working on the Demonstration.</td>
<td>Total number of FTE care coordinators working on the Demonstration as of the last day of the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total FTE care coordinators assigned to care management and conducting assessments.</td>
<td>Of the total reported in A, the number of FTE care coordinators assigned to care management and conducting assessments during the reporting period.</td>
<td>Field Type: Numeric Note: Is a subset of A.</td>
</tr>
</tbody>
</table>
B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.

C. Edits and Validation checks - validation checks that should be performed by each MMP prior to data submission.

- Confirm those data elements listed above as subsets of other elements.
- MMPs should validate that data element B is less than or equal to data element A.
- All data elements should be positive integer values.

D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored.

**Note:** This measure is not adjusted for case mix, plus care coordination will vary for each demonstration and each MMP’s care plan model structure. Therefore, this measure will be used solely to track care coordination investments and changes in each MMP’s care coordinator to member ratio longitudinally.

CMS and the state will:

- Use enrollment data to evaluate the number of members per FTE care coordinator.
- Evaluate the percentage of FTE care coordinators who were assigned to care management and conducting assessments.
- Evaluate the percentage of FTE care coordinators that left the MMP during the reporting period.

E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- Care coordinator will be defined in the state-specific appendix. Different terms may be used in different states.
- All part-time and full-time care coordinators will be counted, regardless of whether they are subcontracted or employed directly by the MMP.
- FTE is defined as full time equivalent. To calculate this, add up all of the care coordinators’ work hours during the reporting period and divide this value by the number of normal working hours that occurred during the reporting period. In instances where care coordinators support multiple lines of business, include only the time associated with the demonstration/MMP. For all data elements, FTE reported values should be rounded to the nearest positive integer.

- Data element C includes care coordinators who are assigned to a different role within the MMP.

F. Data Submission - how MMPs will submit data collected to CMS and the state.

- MMPs will submit data collected for this measure through the Health Plan Management System (HPMS).

5.2 Annual staffing worksheets. – Retired

5.3 Establishment of consumer advisory board or inclusion of consumers on a pre-existing governance board consistent with contractual requirements.¹

<table>
<thead>
<tr>
<th>CONTINUOUS REPORTING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporting Section</td>
</tr>
<tr>
<td>5. Organizational Structure and Staffing</td>
</tr>
</tbody>
</table>

MMPs will be required to submit information on each consumer advisory board and/or governance board during the annual reporting period. One template per meeting should be completed and submitted. A template for providing information is located on the CMS Financial Alignment Initiative website:


A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.
<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Date.</td>
<td>Date each meeting occurred during the annual reporting period.</td>
<td>Field Type: Numeric Note: Date in YYYYMMDD Format. Note: MMPs should input data into the template provided by CMS.</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of board members invited.</td>
<td>Count of all consumer advisory board/governance board members invited to the meeting.</td>
<td>Field Type: Numeric Note: MMPs should input data into the template provided by CMS.</td>
</tr>
<tr>
<td>C.</td>
<td>Total number of board members in attendance.</td>
<td>Count of all consumer advisory board/governance board members in attendance either in-person or remotely.</td>
<td>Field Type: Numeric Note: MMPs should input data into the template provided by CMS.</td>
</tr>
<tr>
<td>D.</td>
<td>Total number of board members invited who are actual beneficiaries or family caregivers.</td>
<td>Count of board members invited who are actual beneficiaries or family caregivers. Professional advocates should not be included unless they are also members or caregivers for members of the MMP.</td>
<td>Field Type: Numeric Note: MMPs should input data into the template provided by CMS.</td>
</tr>
<tr>
<td>E.</td>
<td>Total number of board members who are actual beneficiaries or family caregivers in attendance.</td>
<td>Count of board members who are actual beneficiaries or family caregivers in attendance either in-person or remotely. Professional advocates should not be included unless they are also members or caregivers for members of the MMP.</td>
<td>Field Type: Numeric Note: MMPs should input data into the template provided by CMS.</td>
</tr>
<tr>
<td>F.</td>
<td>Agenda.</td>
<td>Agenda for each meeting during the annual period.</td>
<td>Field Type: N/A Note: MMPs should input data into the template provided by CMS.</td>
</tr>
</tbody>
</table>
B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.

C. Edits and Validation Checks - validation checks that should be performed by each MMP prior to data submission.

- Meeting dates are within the performance period.
- MMPs should validate that the number of members reported in element C is a subset of the number of members reported in element B.
- MMPs should validate that the number of members reported in element D is a subset of the number of members reported in element B.
- MMPs should validate that the number of members reported in element E is a subset of the number of members reported in element D and also is a subset of the number of members reported in element C.

D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored.

- CMS and the state will analyze attendance and participation of MMP members in board meetings.

E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- MMPs should submit one Microsoft Word template per meeting.
- For reporting data elements B, C, D, and E, MMPs should only include established consumer advisory board/governance board members. Additionally, MMPs should only include a total count of the members who satisfy each data element; MMPs are no longer required to provide the full names of the members/board members.

F. Data Submission - how MMPs will submit data collected to CMS and the state.
• MMPs will submit data collected for this measure in the above specified format through a secure data transmission site established by CMS. This site can be accessed at the following web address: https://fm.hshapps.com/login.aspx?ReturnUrl=%2fdefault.aspx
• Required File Format is Microsoft Word File.
• The file name extension should be “.docx”
• File name= (STATEABBREVIATION)_(CONTRACTID)_(REPORTING PERIOD)_(MEETINGDATE).docx.
• Replace (STATEABBREVIATION) with the two-character state abbreviation (e.g., Massachusetts is MA), (CONTRACTID) with the contract ID, (REPORTINGPERIOD) with the year and month of the beginning of the reporting period in YYYYMM format (e.g., January 2018 would be 201801), (MEETINGDATE) with the month, date, and year of the meeting in YYYYMMDD format (e.g., March 31, 2018 would be 20180331).
• All populated templates should be uploaded to the secure data transmission site in a single zip file.
Section VI. Performance and Quality Improvement

6.1 Screening for Clinical Depression and Follow-up Plan. (modified from NQF #0418) – Retired

Section VII. Provider Network

7.1 Medicare Provider Network.

<table>
<thead>
<tr>
<th>CONTINUOUS REPORTING</th>
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</thead>
<tbody>
<tr>
<td>Reporting Section</td>
</tr>
<tr>
<td>7. Provider Network</td>
</tr>
</tbody>
</table>

A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>MMP Health Service Delivery Provider Table</td>
<td>Refer to MMP Medicare Network Submission Guidance for data definitions.</td>
<td>Field Type: Data Entry</td>
</tr>
<tr>
<td>B.</td>
<td>MMP Health Service Delivery Facility Table</td>
<td>Refer to MMP Medicare Network Submission Guidance for data definitions.</td>
<td>Field Type: Data Entry</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will assess Health Service Delivery (HSD) tables against Medicare MMP standards that are available on the MMCO website.

C. Edits and Validation checks - validation checks that should be performed by each MMP prior to data submission.

- Confirm HSD tables will properly upload into HPMS using the plan upload functionality.
MMPs should validate that MMP Medicare Networks meet MMP standards using the plan upload functionality prior to the MMP Medicare Network Annual submission.

D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored.

- CMS will assess the submitted HSD tables against the MMP Medicare Network Standards.

E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- MMPs should refer to the MMP Medicare Network Submission Guidance that will be issued separately for the relevant reporting year.

F. Data Submission - how MMPs will submit data collected to CMS and the state.

- MMPs will submit data collected for this measure through the Health Plan Management System (HPMS).
Section VIII. Systems

8.1 LTSS clean claims paid within 30 days, 60 days, and 90 days.

### IMPLEMENTATION

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Periods</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>8. Systems</td>
<td>Quarterly</td>
<td>Contract</td>
<td>Current Calendar Quarter</td>
<td>By the end of the second month following the last day of the reporting period</td>
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<td></td>
<td></td>
<td></td>
<td>Ex: 1/1-3/31 4/1-6/30 7/1-9/30 10/1-12/31</td>
<td></td>
</tr>
</tbody>
</table>

A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of LTSS clean claims paid within the reporting period.</td>
<td>Total number of LTSS clean claims paid within the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of clean claims paid within 30 calendar days of receipt.</td>
<td>Of the total reported in A, the number of clean claims paid within 30 calendar days of receipt.</td>
<td>Field Type: Numeric Note: Is a subset of A.</td>
</tr>
<tr>
<td>C.</td>
<td>Total number of clean claims paid within 60 calendar days of receipt.</td>
<td>Of the total reported in A, the number of clean claims paid within 60 calendar days of receipt.</td>
<td>Field Type: Numeric Note: Is a subset of A.</td>
</tr>
<tr>
<td>D.</td>
<td>Total number of clean claims paid within 90 calendar days of receipt.</td>
<td>Of the total reported in A, the number of clean claims paid within 90 calendar days of receipt.</td>
<td>Field Type: Numeric Note: Is a subset of A.</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.
C. Edits and Validation checks - validation checks that should be performed by each MMP prior to data submission.

- Confirm those data elements listed above as subsets of other elements.
- MMPs should validate that data elements B, C, and D are less than or equal to data element A.
- All data elements should be positive values.

D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will evaluate the percentage of LTSS clean claims that were paid within:

- 30 calendar days of receipt.
- 60 calendar days of receipt.
- 90 calendar days of receipt.

E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- Long Term Services and Supports (LTSS) will be defined in the state-specific appendix.
- A “clean” claim is one that has no defect, impropriety, lack of any required substantiating documentation, or particular circumstance requiring special treatment that prevents timely payment.
- The 30-, 60-, and 90-day cutoffs should be calculated using individual calendar days, unlike Core Measures 2.1 and 2.2 where “90 days of enrollment” is considered equivalent to three full calendar months.
- MMPs should include LTSS clean claims if they were paid during the reporting period. LTSS clean claims submitted during the reporting period, but not paid during the reporting period, should not be included.

F. Data Submission - how MMPs will submit data collected to CMS and the state.

- MMPs will submit data collected for this measure through the Health Plan Management System (HPMS).
Section IX. Utilization

9.1 Emergency room behavioral health services utilization.

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Periods</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Utilization</td>
<td>Quarterly</td>
<td>Contract</td>
<td>Current Calendar Quarter Ex: 1/1-3/31 4/1-6/30 7/1-9/30 10/1-12/31</td>
<td>By the end of the second month following the last day of the reporting period</td>
</tr>
</tbody>
</table>

A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of behavioral health-related emergency department (ED) visits with a CPT or UB Revenue code for an ED visit and a principal diagnosis related to behavioral health</td>
<td>Total number of behavioral health-related emergency department (ED) visits with a CPT or UB Revenue code for an ED visit and a principal diagnosis related to behavioral health during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds - procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.

C. Edits and Validation Checks - validation checks that should be performed by each MMP prior to data submission.

- Data element should be a positive value.
D. Analysis - how CMS and the state will evaluate reported data, as well as how other data sources may be monitored.

- CMS and the state will use enrollment information to evaluate the total number of behavioral health-related ED visits per 10,000 member months during the reporting period.

E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- MMPs should include all members regardless of whether the member was enrolled through passive enrollment or opt-in enrollment. Medicaid-only members should not be included.
- MMPs should include all behavioral health-related ED visits for members who meet the criteria outlined in data element A, regardless if they are disenrolled as of the end of the reporting period (i.e., include all members regardless if they are currently enrolled or disenrolled as of the last day of the reporting period).
- MMPs should use the ED value set to identify emergency department visits.
- MMPs should use the Mental Health Diagnosis value set to identify a behavioral health diagnosis.
- MMP should exclude members if they are admitted as inpatients.

F. Data Submission - how MMPs will submit data collected to CMS and the state.

- MMPs will submit data collected for this measure through the Health Plan Management System (HPMS).
9.2 Nursing Facility (NF) Diversion.

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Period</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Utilization</td>
<td>Annually</td>
<td>Contract</td>
<td>Calendar Year, beginning CY2</td>
<td>By the end of the second month following the last day of the reporting period</td>
</tr>
</tbody>
</table>

A. Data element definitions - details for each data element reported to CMS and the State, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of members who were continuously enrolled in the MMP for at least 5 out of the last 6 months during the previous reporting period and continuously enrolled in the MMP for at least 11 out of 12 months during the current reporting period.</td>
<td>Total number of members who were continuously enrolled in the MMP for at least 5 out of the last 6 months during the previous reporting period and continuously enrolled in the MMP for at least 11 out of 12 months during the current reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>The total number of members who were classified as nursing home certifiable for more than 100 continuous days during the previous reporting period who did not reside in a NF for more than 100 continuous days during the previous reporting period.</td>
<td>Of the total reported in A, the number of members who were classified as nursing home certifiable for more than 100 continuous days during the previous reporting period who did not reside in a NF for more than 100 continuous days during the previous reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td>Note: Is a subset of A.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C.</td>
<td>Total number of members who did not reside in a NF for more than 100 continuous days during the current reporting period.</td>
<td>Of the total reported in B, the number of members who did not reside in a NF for more than 100 continuous days during the current reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td>Note: Is a subset of B.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
B. QA checks/Thresholds - procedures used by CMS and the State to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.

C. Edits and Validation checks - validation checks that should be performed by each MMP prior to data submission.

- Confirm those data elements listed above as subsets of other elements.
- MMPs should validate that data element B is less than or equal to data element A.
- MMPs should validate that data element C is less than or equal to data element B.
- All data elements should be positive values.

D. Analysis - how CMS and the State will evaluate reported data, as well as how other data sources may be monitored.

- For members classified as nursing home certifiable for more than 100 continuous days during the previous reporting period who did not reside in a NF for more than 100 continuous days during the previous reporting period, CMS and the state will evaluate the percentage of members who did not reside in a NF for more than 100 continuous days during the current reporting period.

E. Notes - additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- MMPs should include all members regardless of whether the member was enrolled through passive enrollment or opt-in enrollment. Medicaid-only members should not be included.
- For the purposes of this measure, the “previous reporting period” is defined as the previous calendar year. The “current reporting period” is defined as the current calendar year. For example, for data submitted on February 28, 2019, the previous reporting period is January 1, 2017 – December 31, 2017, and the current reporting period is January 1, 2018 – December 31, 2018.
- The member must be enrolled as of the last day of both the previous and current reporting periods to be included in this measure.
- For reporting members in data element A, members must meet both continuous enrollment criteria in order to be included in this data element. Therefore, the member must be continuously enrolled as a Medicare-Medicaid member in the MMP for at least 5 out of the last 6 months during the previous reporting period and continuously enrolled as a Medicare-Medicaid member in the MMP for at least 11 out of 12 months during the current reporting period. Members meeting this criteria for only one of the reporting periods should not be included in data element A.
Continuous enrollment is defined as no more than one gap in enrollment of up to 45 days during each reporting period (i.e., July through December [previous reporting period] and January through December [current reporting period]). To determine continuous enrollment for a member for whom enrollment is verified monthly, the member may not have more than a 1-month gap in coverage (i.e., a member whose coverage lapses for 2 months [60 days] is not considered continuously enrolled).

Nursing home certifiable members are defined as members living in the community, but requiring an institutional level of care. Additionally, members who have a stay in a NF may be considered nursing home certifiable depending on the length of stay. MMPs should refer to their state’s specific definition for additional information.

To identify members for inclusion in data element B, MMPs should first identify all members who were nursing home certifiable for more than 100 continuous days at any point during the previous reporting period (January through December). Then, MMPs should exclude any of these members who resided in a NF for at least 101 continuous days during the previous reporting period.

- For example, a member who entered a NF on September 4 and remained there on December 31 of the previous reporting period has more than 100 continuous days in a NF in the previous reporting period (119 days within the previous reporting period) and would not be included in data element B. A member who entered a NF on October 4 of the previous reporting period and remained there through February 1 of the current reporting period would not have more than 100 continuous days in a NF during the previous reporting period (residing there only 89 days during the previous reporting period) and would be included in data element B as long as they were nursing home certifiable for more than 100 continuous days during the previous reporting period.

- MMPs should use all available data to document and confirm a member’s status as nursing home certifiable. In the event of missing data for members who had a single, 1-month-long gap in coverage during the previous reporting period and who were documented as nursing home certifiable before the 1-month gap and after the 1-month gap, MMPs may assume that the member was nursing home certifiable during the 1-month gap.

For reporting data element C, MMPs should exclude all members who reached their 101st continuous day of a NF stay during the current reporting period. This may include members who entered the NF within the previous reporting period as well as members who entered the NF during the current reporting period.

- For example, a member who entered a NF on October 4 of the previous reporting period and remained there on February 1 of the current reporting period reached his or her 101st day on January 13 and, therefore, would be excluded from data element C. Alternatively, a member who entered a NF on August 1 of the current reporting period and remained there on December 31 of the current reporting period reached his or her 101st day on November 9 and would also be excluded from data element C.
For data elements B and C, when determining the number of continuous days a member resided in the NF, if a member is transferred or discharged from the NF and then is readmitted to any NF within 30 days, the transfer/discharge and subsequent readmission do not disrupt the count of continuous days. For example, if a member is transferred from the NF to the hospital on day 57 and is subsequently readmitted to the same or a different NF 29 days later, this will be counted as the same episode. The member’s first day after returning to a NF (i.e., the day the member is readmitted to the NF) will count as day 58 for that episode, not as day 1. If a member is transferred from the NF and then is readmitted to any NF after 30 days, the date of readmission is the start of a new episode in the NF and will count as day 1 toward the member’s continuous days in the facility.

NF services are those services provided by nursing homes certified by Medicaid, Medicare, or other state agencies. NF includes skilled nursing facilities (not Adult Family Care Homes [AFCH], Assisted Living Facilities [ALF], Intermediate Care Facilities [ICF], or Supportive Living Facilities [SLF]).

MMPs should exclude members who are transitioned to hospice services in either the current or previous reporting periods when reporting this measure. These members may be identified using various methods, which may include but are not limited to enrollment data, medical record or claims/encounter data (Hospice value set).

MMPs should exclude members who expired in either the current or previous reporting period when reporting this measure using the Discharges due to Death value set.

This measure will not be reported until Calendar Year 2.

F. Data Submission - how MMPs will submit data collected to CMS and the State.

MMPs will submit data collected for this measure through the Health Plan Management System (HPMS).
IPA Approval Review Tool
All LOB's

IPA:

Service Month:

Review Date:

Reviewer:

Instructions: IEHP randomly selects 10 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.

<table>
<thead>
<tr>
<th>(a) Approval Tracking #</th>
<th>(b) File Type Requested</th>
<th>(c) Auto Authorization</th>
<th>(d) Referral Request Date</th>
<th>(e) Referral Received Date</th>
<th>(f) Decision Date</th>
<th>(g) Written Physician Notification Date</th>
<th>(i) Member Written Notification</th>
<th>(j) Physician Written Notification</th>
<th>(k) Member Language</th>
<th>(l) Practitioner Language</th>
<th>(m) Clinical Information</th>
<th>(n) Referral Form</th>
<th>(o) Correct Template</th>
<th>(p) Points Received</th>
<th>(q) Points Possible</th>
<th>(r) Individual Score</th>
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</thead>
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Data Dictionary

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A Provided from the Delegate file submission.
MEDICARE-MEDICAID CAPITATED FINANCIAL ALIGNMENT MODEL REPORTING REQUIREMENTS: CALIFORNIA-SPECIFIC REPORTING REQUIREMENTS

Effective as of October 1, 2018; Issued February 28, 2019
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CALIFORNIA-SPECIFIC REPORTING REQUIREMENTS APPENDIX

Introduction

The measures in this appendix are required reporting for all MMPs in the Cal MediConnect Demonstration. CMS reserves the right to update the measures in this appendix for subsequent demonstration years. These state-specific measures directly supplement the Medicare-Medicaid Capitated Financial Alignment Model Core Reporting Requirements, which can be found at the following web address:


MMPs should refer to the core document for additional details regarding Demonstration-wide definitions, reporting phases and timelines, and sampling methodology.

The core and state-specific measures supplement existing Part C and Part D reporting requirements, as well as measures that MMPs report via other vehicles or venues, such as HEDIS®¹ and HOS. CMS and the states will also track key utilization measures, which are not included in this document, using encounter and claims data. The quantitative measures are part of broader oversight, monitoring, and performance improvement processes that include several other components and data sources not described in this document.

For the measures contained within the California state-specific appendix, MMPs will be required to submit data at the contract level. Additional information regarding the Data Submission process is provided on page CA-12.

MMPs should contact the CA HelpDesk at CAHelpDesk@norc.org with any questions about the California state-specific appendix or the data submission process.

Definitions

Calendar Quarter: All quarterly measures are reported on calendar quarters. The four calendar quarters of each calendar year will be as follows: 1/1 – 3/31, 4/1 – 6/30, 7/1 – 9/30, 10/1 – 12/31.

Calendar Year: All annual measures are reported on a calendar year basis. For MMPs with a first effective enrollment date of April 1, 2014, data for annual CY 2014 measures will be reported for the time period beginning April 1, 2014 and ending December 31, 2014. For MMPs with a first effective enrollment date of July 1, 2014, data for annual CY 2014 measures will be reported for the time period beginning July 1, 2014 and ending December 31, 2014. For MMPs with a first effective enrollment date of July 1, 2015, data for annual CY 2015 measures will be reported for the time period beginning July 1, 2015 and ending December 31, 2015.

Case Management, Information and Payrolling System II (CMIPS II): A system that tracks case information and processes payments for the California Department of Social

¹ HEDIS® is a registered trademark of the National Committee for Quality Assurance (NCQA).
Services In-Home Supportive Services Program, enabling nearly 400,000 qualified aged, blind, and disabled individuals in California to remain in their own homes and avoid institutionalization.

In-Home Supportive Services (IHSS): Pursuant to Article 7 of the California Welfare and Institutions Code (WIC) (commencing with Section 12300) of Chapter 3, and WIC Sections 14132.95, 14132.952, and 14132.956, IHSS is a California program that provides in-home care for people who cannot safely remain in their own homes without assistance. To qualify for IHSS, an Enrollee must be aged, blind, or disabled and, in most cases, have income below the level to qualify for the Supplemental Security Income/State Supplementary Program. IHSS includes the Community First Choice Option (CFCO), Personal Care Services Program (PCSP), and IHSS-Plus Option (IPO).

Implementation Period: The period of time starting with the first effective enrollment date until the end of the first full quarter following the third wave of passive enrollment (therefore, all MMPs would have an implementation period of at least 6 months). For MMPs adding a county in 2015, the implementation period continues for a full quarter following the first effective date of enrollment.

For example, for an MMP that began both opt-in and passive enrollment on April 1, 2014, the implementation period would start on April 1, 2014 and end on September 30, 2014. For an MMP that began opt-in enrollment on April 1, 2014 and began passive enrollment on May 1, 2014, the implementation period would start on April 1, 2014 and end on December 31, 2014. For an MMP that began opt-in enrollment on April 1, 2014 and began passive enrollment on July 1, 2014, the implementation period would start on April 1, 2014 and end on December 31, 2014. For an MMP that began both opt-in and passive enrollment on July 1, 2014, the implementation period would start on July 1, 2014 and end on December 31, 2014. For an MMP beginning both opt-in and passive enrollment on January 1, 2015, the implementation period would start on January 1, 2015 and end on June 30, 2015. For an MMP beginning opt-in enrollment on July 1, 2015 and beginning passive enrollment on August 1, 2015, the implementation period would start on July 1, 2015 and end on December 31, 2015. For any MMP that begins passive enrollment in a new county in 2015, the implementation period for that MMP would extend for a full quarter following the first wave of passive enrollment for that county.

For MMPs with less than 3 waves of passive enrollment, the implementation period will end September 30, 2014.

Individualized Care Plan (ICP or Care Plan): The plan of care developed by an Enrollee and/or an Enrollee’s Interdisciplinary Care Team or health plan.

Long Term Services and Supports (LTSS): A wide variety of services and supports that help people with disabilities meet their daily needs for assistance and improve the quality of their lives. Examples include assistance with bathing, dressing and other basic activities of daily life and self-care, as well as support for everyday tasks such as laundry, shopping, and transportation. LTSS are provided over an extended period, predominantly in homes and communities, but also in facility-based settings such as nursing facilities. As described in California WIC Section 14186.1, Medi-Cal covered LTSS includes all of the following:
1. IHSS provided pursuant to Article 7 of California WIC (commencing with Section 12300) of Chapter 3, and WIC Sections 14132.95, 14132.952, and 14132.956;
2. Community-Based Adult Services (CBAS);
3. Multipurpose Senior Services Program (MSSP) services; and
4. Skilled nursing facility (SNF) services and subacute care services.

Primary Care Provider (PCP): A person responsible for supervising, coordinating, and providing initial and primary care to patients; for initiating referrals; and for maintaining the continuity of patient care. A PCP may be a physician or non-physician medical practitioner.

Unmet Need: Documented unmet need is a recipient’s total hours for Non-Protective Supervision IHSS that are in excess of the statutory maximum.

**Variation from the Core Reporting Requirements Document**

Core Measure 9.2

The following section provides additional guidance about identifying individuals enrolled in the MMP as “nursing home certifiable,” or meeting the nursing facility level of care (NF LOC), for the purposes of reporting Core 9.2.

Within Core 9.2, “nursing home certifiable” members are defined as “members living in the community but requiring an institutional level of care” (see the Core Reporting Requirements for more information). Please reference Title 22, CCR Division 3, sections 51173.1, 51120, 51124, 51124.5, 51125.6, 51334 and 51335 of the CA Code of Regulations for additional information and definitions as it relates to this measure.

The Medicaid 834 eligibility file provided to MMPs by the state on a daily and monthly basis contains variables indicating an individual’s status with regard to meeting the NF LOC. The relevant variables are as follows:

- **Variable 3.8. Institutional Indicator (Y):** Identifies actual institutional placement (i.e., anyone residing in a SNF for 90 or more consecutive days).
- **Variable 3.7. CCI Exclusion Indicator (M, N):** Indicates that a member lives in the community and meets the NF LOC for CBAS and MSSP only.
- **Eligibility status code 2K, Loop 2300 REF 01 under ‘CE’ (Note: Status code 2K could be found in any of the following fields - SPEC1-AID, SPEC2-AID, SPEC3-AID):** Indicates that a member lives in the community and meets the NF LOC for IHSS only.

In addition to these variables in the 834 file, MMPs should use claims data to ensure the member qualifies as nursing home certifiable, (i.e., is living in the community or has resided in a NF for fewer than 100 days). This may include individuals who have resided in a NF for 90 – 99 days and have thus triggered the long-term care (LTC) indicator, but still fall below the 100-day threshold for the purposes of Core 9.2.

It is possible that some individuals who have never been assessed for LTSS (e.g., community well or individuals stratified as HCBS low) will indeed be nursing home certifiable and this status will be unknown to the MMP. This is a limitation of this
measure. Provided that MMPs comply with the requirements for assessment and care planning under the Demonstration, no further action by the MMP to identify these individuals is necessary.

**Quality Withhold Measures**

CMS and the state will establish a set of quality withhold measures, and MMPs will be required to meet established thresholds. Throughout this document, state-specific quality withhold measures are marked with the following symbol for Demonstration Year 1: (i) and the following symbol for Demonstration Years 2 through 5: (ii). For more information about the state-specific quality withhold measures, refer to the Quality Withhold Technical Notes (DY 1): California-Specific Measures and the Quality Withhold Technical Notes (DY 2-5): California-Specific Measures at https://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/MMPInformationandGuidance/MMPQualityWithholdMethodologyandTechnicalNotes.html.

**Reporting on HRAs and ICPs Completed Prior To First Effective Enrollment Date**

MMPs may complete Health Risk Assessments (HRAs) prior to individuals’ effective date of enrollment, provided that the MMP meets the requirements as articulated in the National MMP Enrollment and Disenrollment Guidance. Note that for individuals who are passively enrolled, the MMP may reach out to complete an HRA no sooner than 20 days before the individual’s effective date of the passive enrollment.

For purposes of reporting data on initial HRAs (Core 2.1 and Core 2.2), MMPs should report any HRAs completed prior to the first effective enrollment date as if they were completed on the first effective enrollment date. For example, if a member’s first effective enrollment date was June 1 and the HRA for that member was completed on May 25, the MMP should report the HRA as if it was completed on June 1.

MMPs should refer to the Core Reporting Requirements for detailed specifications for reporting Core 2.1 and Core 2.2. For example, Core 2.1 should only include members whose 90th day of enrollment occurred during the reporting period. Members enrolled into the MMP on June 1 would reach their 90th day (3 full months) on August 31. Therefore, these members would be reported in the data submission for the Quarter 3 reporting period, even if their HRA was marked as complete on the first effective enrollment date (i.e., June 1).

MMPs must comply with contractually specified timelines regarding completion of ICPs following the HRA. In the event that an ICP is also finalized prior to the first effective enrollment date, MMPs should report completion of the ICP (for measures Core 3.2, CA1.5, and CA1.6) as if it was completed on the first effective enrollment date. For example, if a member’s first effective enrollment date was June 1 and the ICP for that member was completed on May 27, the MMP should report the ICP as if it were completed on June 1.
Guidance on HRAs and ICPs for Members with a Break in Coverage

Health Risk Assessments

To determine if an HRA should be conducted for a member that re-enrolled in the same or a different MMP, the MMP should determine if the member previously received an HRA from any MMP in the Cal MediConnect Demonstration. If the member received an HRA from the same MMP within one year of his/her most recent enrollment date, or from a different MMP within 6 months of changing MMPs, then the MMP is not necessarily required to conduct a new HRA, until there is a change in the enrollee’s condition. Instead, the MMP can:

1. Perform any risk stratification, claims data review, or other analyses as required by the three-way contract to detect any changes in the member’s condition since the HRA was conducted; and

2. Ask the member (or his/her authorized representative) if there has been a change in the member’s health status or needs since the HRA was conducted.

The MMP must document any risk stratification, claims data review, or other analyses that are performed to detect any changes in the member’s condition. The MMP must also document its outreach attempts and the discussion(s) with the member (or his/her authorized representative) to determine if there was a change in the member’s health status or needs.

If a change is identified, the MMP must conduct a new HRA within the timeframe prescribed by the three-way contract. If there are no changes, the MMP is not required to conduct a new HRA unless requested by the member (or his/her authorized representative). Please note, if the MMP prefers to conduct HRAs on all re-enrollees regardless of status, it may continue to do so.

Once the MMP has conducted a new HRA as needed or confirmed that the prior HRA is still accurate, the MMP can mark the HRA as complete for the member’s current enrollment. The MMP would then report that completion according to the specifications for Core 2.1 and Core 2.2. When reporting these measures, the MMP should count the number of enrollment days from the member’s most recent enrollment effective date and should report the HRA based on the date the prior HRA was either confirmed to be accurate or a new HRA was completed. Additionally, in certain circumstances a new assessment that has been completed for a member upon reenrollment may also be reported in Core 2.3.

If the MMP is unable to reach a re-enrolled member to determine if there was a change in health status, then the MMP may report that member as unable to be reached so long as the MMP made the requisite number of outreach attempts. If a re-enrolled member refuses to discuss his/her health status with the MMP, then the MMP may report that member as unwilling to participate in the HRA.

If the MMP did not complete an HRA for the re-enrolled member within one year of his/her most recent date of enrollment into the same MMP or an HRA was not completed for the member within the previous 6 months by a different MMP for those members who changed MMPs, the MMP is required to conduct an HRA for the member within the timeframe prescribed by the three-way contract and relevant Duals Plan.
Letter (DPL). The MMP must make the requisite number of attempts to reach the member (at minimum) after his/her most recent enrollment effective date, even if the MMP reported that the member was unable to be reached during his/her prior enrollment. Similarly, members that refused the HRA during their prior enrollment must be asked again to participate (i.e., the MMP may not carry over a refusal from one enrollment period to the next).

Individualized Care Plans

If the MMP conducts a new HRA for the re-enrolled member, the MMP must revise the ICP accordingly within the timeframe prescribed by the three-way contract. Once the ICP is revised, the MMP may mark the ICP as complete for the member’s current enrollment. If the MMP determines that the prior HRA is still accurate and, therefore, no updates are required to the previously completed ICP, the MMP may mark the ICP as complete for the current enrollment at the same time that the HRA is marked complete. The MMP would then follow the Core 3.2, CA1.5, and CA1.6 measure specifications for reporting the completion. Please note, for purposes of reporting, the ICP for the re-enrolled member should be classified as an initial ICP.

If the MMP did not complete an ICP for the re-enrolled member during his/her prior enrollment period, or if it has been more than one year since the member’s ICP was completed, the MMP is required to complete an ICP for the member within the timeframe prescribed by the three-way contract. The MMP must also follow the above guidance regarding reaching out to members that previously refused to participate or were not reached.

Annual Reassessments and ICP Updates

The MMP must follow the three-way contract requirements regarding the completion of annual reassessments and updates to ICPs. If the MMP determined that an HRA/ICP from a member’s prior enrollment was accurate and marked that HRA/ICP as complete for the member’s current enrollment, the MMP should count continuously from the date that the HRA/ICP was completed in the prior enrollment period to determine the due date for the annual reassessment and ICP update. For example, when reporting Core 2.3, the MMP should count 365 days from the date when the HRA was actually completed, even if that date was during the member’s prior enrollment period.

Reporting on Passively Enrolled and Opt-In Enrolled Members

When reporting all California state-specific measures, MMPs should include all members who meet criteria for inclusion in the measure regardless of whether the member was enrolled through passive enrollment or opt-in enrollment. Medicaid-only members should not be included.

Reporting on Disenrolled and Retro-disenrolled Members

Unless otherwise indicated in the reporting requirements, MMPs should report on all members enrolled in the demonstration who meet the definition of the data elements, regardless of whether that member was subsequently disenrolled from the MMP. Measure-specific guidance on how to report on disenrolled members is provided under the Notes section of each state-specific measure.
Due to retro-disenrollment of members, there may be instances where there is a lag between a member’s effective disenrollment date and the date on which the MMP is informed about that disenrollment. This time lag might create occasional data inaccuracies if an MMP includes members in reports who had in fact disenrolled before the start of the reporting period. If MMPs are aware at the time of reporting that a member has been retro-disenrolled with a disenrollment effective date prior to the reporting period (and therefore was not enrolled during the reporting period in question), then MMPs may exclude that member from reporting. Please note that MMPs are not required to re-submit corrected data should they be informed of a retro-disenrollment subsequent to a reporting deadline. MMPs should act upon their best and most current knowledge at the time of reporting regarding each member’s enrollment status.

Hybrid Sampling

Some demonstration-specific measures may allow medical record/supplemental documentation review to identify the numerator. In these instances, the sample size should be 411, plus additional records to allow for substitution. Sampling should be systematic to ensure that all individuals eligible for a measure have an equal chance of inclusion.

MMPs should complete the following steps for each measure that requires medical record review:

**Step 1:** Determine the eligible population. Create a list of eligible members, including full name, date of birth, and event (if applicable).

**Step 2:** Determine the final sample size. The final sample size will be 411 plus an adequate number of additional records to make substitutions. Oversample only enough to guarantee that the targeted sample size of 411 is met. The following oversampling rates are acceptable: 5 percent, 10 percent, 15 percent, or 20 percent. If oversampling, round up to the next whole number when determining the final sample size.

**Step 3:** If the eligible population exceeds the final sample size as determined in Step 2, proceed to Step 5. If the eligible population is less than or equal to the final sample size as determined in Step 2, proceed to Step 4.

**Step 4:** If the eligible population is less than or equal to the final sample size as determined in Step 2, the sample size can be reduced from 411 cases to a reduced final sample size by using the following formula:

\[
Reduced\ Final\ Sample\ Size = \frac{\text{Original Final Sample Size}}{1 + \left(\frac{\text{Original Final Sample Size}}{\text{Eligible Population}}\right)}
\]

Where the *Original Final Sample Size* is the number derived from Step 2, and the *Eligible Population* is the number derived from Step 1.
Step 5: Sort the list of eligible members in alphabetical order by last name, first name, date of birth, and event (if applicable). Sort this list by last name from A to Z during even reporting periods and from Z to A in odd reporting periods (i.e., name will be sorted from A to Z in 2014, 2016, and 2018 and from Z to A in 2015, 2017, and 2019).

Note: Sort order applies to all components. For example, for reporting period 2014, the last name, first name, date of birth, and events will be ascending.

Step 6: Calculate $N$, which will determine which member will start your sample. Round down to the nearest whole number.

$$N = \frac{\text{Eligible Population}}{\text{Final Sample Size}}$$

Where the Eligible Population is the number derived from Step 1. The Final Sample Size is either:

- The number derived from Step 2, for instances in which the eligible population exceeds the final sample size as determined in Step 2.
- OR
- The number derived in Step 4, for instances in which the eligible population was less than or equal to the number derived from Step 2.

Step 7: Randomly select starting point, $K$, by choosing a number between one and $N$ using a table of random numbers or a computer-generated random number.

Step 8: Select every $K$th record thereafter until the selection of the sample size is completed.

Value Sets

The measure specifications in this document refer to code value sets that must be used to determine and report measure data element values. A value set is the complete set of codes used to identify a service or condition included in a measure. The California-Specific Value Sets Workbook includes all value sets and codes needed to report certain measures included in the California-Specific Reporting Requirements and is intended to be used in conjunction with the measure specifications outlined in this document. The California-Specific Value Sets Workbook can be found on the CMS website at the following address: https://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/MMPIInformationandGuidance/MMPRreportingRequirements.html.
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Data Submission

All MMPs will submit state-specific measure data through the web-based Financial Alignment Initiative Data Collection System (FAI DCS) (unless otherwise specified in the measure description). All data submissions must be submitted to this site by 5:00 p.m. ET on the applicable due date. This site can be accessed at the following web address: https://Financial-Alignment-Initiative.NORC.org.

(Note: Prior to the first use of the system, all MMPs will receive an email notification with the username and password that has been assigned to their MMP. This information will be used to log in to the FAI DCS and complete the data submission.)

All MMPs will submit core measure data in accordance with the Core Reporting Requirements. Submission requirements vary by measure, but most core measures are reported through the Health Plan Management System (HPMS).

Please note, late submissions may result in compliance action from CMS.

Resubmission of Data

MMPs must comply with the following steps to resubmit data after an established due date:

1. Email the CA HelpDesk (CAHelpDesk@norc.org) to request resubmission.
   a. Specify in the email which measure(s) need resubmission;
   b. Specify for which reporting period(s) the resubmission is needed; and
   c. Provide a brief explanation for why the data need to be resubmitted.

2. After review of the request, the CA HelpDesk will notify the MMP once the FAI DCS and/or HPMS has been re-opened.

3. Resubmit data through the applicable reporting system.

4. Notify the CA HelpDesk again after resubmission has been completed.

Please note, requests for resubmission after an established due date may result in compliance action from CMS.
Section CAI. Care Coordination

CA1.1 High-risk members with an Individualized Care Plan (ICP) within 30 working days after the completion of the timely initial Health Risk Assessment (HRA). – Retired

CA1.2 High-risk members with an Individualized Care Plan (ICP) within 30 working days after the completion of the initial Health Risk Assessment (HRA). – Retired

CA1.3 Low-risk members with an Individualized Care Plan (ICP) within 30 working days after the completion of the timely initial Health Risk Assessment (HRA). – Retired

CA1.4 Low-risk members with an Individualized Care Plan (ICP) within 30 working days after the completion of the initial Health Risk Assessment (HRA). – Retired

CA1.5 Members with an Individualized Care Plan (ICP) completed.

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A. Data element definitions – details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of high-risk members enrolled for 90 days or longer as of the end of the reporting period.</td>
<td>Total number of high-risk members enrolled for 90 days or longer as of the end of the reporting period who were currently enrolled as of the last day of the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of high-risk members who had an initial ICP completed.</td>
<td>Of the total reported in A, the number of high-risk members who had an initial ICP completed as of the end of the reporting period.</td>
<td>Field Type: Numeric Note: Is a subset of A.</td>
</tr>
<tr>
<td>C.</td>
<td>Total number of low-risk members enrolled for 90 days or longer as of the end of the reporting period.</td>
<td>Total number of low-risk members enrolled for 90 days or longer as of the end of the reporting period who were currently enrolled as of the last day of the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>D.</td>
<td>Total number of low-risk members who had an initial ICP completed.</td>
<td>Of the total reported in C, the number of low-risk members who had an initial ICP completed as of the end of the reporting period.</td>
<td>Field Type: Numeric Note: Is a subset of C.</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds – procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.

C. Edits and Validation checks – validation checks that should be performed by each MMP prior to data submission.

- MMPs should validate that data element B is less than or equal to data element A.
- MMPs should validate that data element D is less than or equal to data element C.
D. Analysis – how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will evaluate the percentage of:

- High-risk members enrolled for 90 days or longer who had an initial ICP completed as of the end of the reporting period.
  - Percentage = (B / A) * 100
- Low-risk members enrolled for 90 days or longer who had an initial ICP completed as of the end of the reporting period.
  - Percentage = (D / C) * 100

E. Notes – additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

Definitions

- **High-risk members** are members who are at increased risk for having an adverse health outcome or worsening of his or her health status if he or she does not receive initial contact within 45 calendar days after their effective enrollment date.
- **Low-risk members** are members who do not meet the minimum requirements of a high-risk member.

Data Elements A and C

- The 90th day of enrollment should be based on each member’s most recent effective enrollment date in the MMP. Members must be continuously enrolled from the most recent effective enrollment date through 90 days of enrollment (or longer) with no gaps in enrollment.
- For the purposes of reporting data elements A and C, 90 days of enrollment will be equivalent to three full calendar months.

Data Elements B and D

- The completed initial ICPs reported in data elements B and D could have been completed at any point from the member’s first day of enrollment through the end of the reporting period.
- MMPs should only report completed ICPs in data elements B and D when the member or the member’s authorized representative was involved in the development of the ICP.

General Guidance

- MMPs should refer to the California three-way contract for specific requirements pertaining to ICPs.
- Risk level should be determined using an approved health risk stratification mechanism or algorithm. The health risk stratification shall be conducted in accordance with the most recent DHCS DPL. MMPs should use the member’s initial risk level categorization for purposes of reporting this measure.
F. Data Submission – how MMPs will submit data collected to CMS and the state.

- MMPs will submit data collected for this measure in the above specified format through a secure data collection site established by CMS. This site can be accessed at the following web address: https://Financial-Alignment-Initiative.NORC.org.

CA1.6 Members with documented discussions of care goals.i, ii

<table>
<thead>
<tr>
<th>CONTINUOUS REPORTING</th>
<th></th>
<th></th>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Reporting Section</td>
<td>Reporting Frequency</td>
<td>Level</td>
<td>Reporting Period</td>
<td>Due Date</td>
</tr>
<tr>
<td>CA1. Care Coordination</td>
<td>Annually</td>
<td>Contract</td>
<td>Calendar Year</td>
<td>By the end of the second month following the last day of the reporting period</td>
</tr>
</tbody>
</table>

A. Data element definitions – details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of members with an initial Individualized Care Plan (ICP) completed.</td>
<td>Total number of members with an initial ICP completed during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of members sampled that met the inclusion criteria.</td>
<td>Of the total reported in A, the number of members sampled that met inclusion criteria.</td>
<td>Field type: Numeric Note: Is a subset of A.</td>
</tr>
<tr>
<td>C.</td>
<td>Total number of members with at least one documented discussion of care goals in the initial ICP.</td>
<td>Of the total reported in B, the number of members with at least one documented discussion of care goals in the initial ICP.</td>
<td>Field Type: Numeric Note: Is a subset of B.</td>
</tr>
<tr>
<td>D.</td>
<td>Total number of existing ICPs revised.</td>
<td>Total number of existing ICPs revised during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>Element Letter</td>
<td>Element Name</td>
<td>Definition</td>
<td>Allowable Values</td>
</tr>
<tr>
<td>---------------</td>
<td>-----------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>E.</td>
<td>Total number of revised ICPs sampled that met inclusion criteria.</td>
<td>Of the total reported in D, the number of revised ICPs sampled that met inclusion criteria.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Note: Is a subset of D.</td>
<td></td>
</tr>
<tr>
<td>F.</td>
<td>Total number of revised ICPs with at least one documented discussion of new or existing care goals.</td>
<td>Of the total reported in E, the number of revised ICPs with at least one documented discussion of new or existing care goals.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Note: Is a subset of E.</td>
<td></td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds – procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- The quality withhold benchmark is 55% for DY 2 and 3, 60% for DY 4, and 65% for DY 5. For more information, refer to the Quality Withhold Technical Notes (DY 2-5): California-Specific Measures.

C. Edits and Validation Checks – validation checks that should be performed by each MMP prior to data submission.

- MMPs should validate that data element B is less than or equal to data element A.
- MMPs should validate that data element C is less than or equal to data element B.
- MMPs should validate that data element E is less than or equal to data element D.
- MMPs should validate that data element F is less than or equal to data element E.

D. Analysis – how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will evaluate the percentage of:

- Members with an initial ICP completed during the reporting period who had evidence of creation of at least one care goal documented in the initial ICP.
  - Percentage = (C / B) * 100
- Existing ICPs revised during the reporting period that had at least one documented discussion of new or existing care goals.
  - Percentage = (F / E) * 100
E. Notes – additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

**Data Element A**

- MMPs should include all members who meet the criteria outlined in data element A, regardless of whether they are disenrolled as of the end of the reporting period (i.e., include all members regardless of whether they are currently enrolled or disenrolled as of the last day of the reporting period).
- Data element A should include all members with ICPs that were completed for the first time during the reporting period (i.e., the member did not previously have an ICP completed prior to the start of the reporting period). There can be no more than one initial ICP completed per member.
- Only ICPs that included participation from the member (or his/her authorized representative) in the completion of the ICP should be reported.

**Data Elements B and E**

- For reporting, the MMPs may elect to sample since this measure may require documentation review to identify data elements C and F. For further instructions on selecting the sample size, please see pages CA-9 to CA-10 of this document.
- If an MMP does not elect to sample, data element B should be equal to data element A and data element E should be equal to data element D.

**Data Element C**

- The MMP should only count members in data element C when the discussion of care goals with the member (or his/her authorized representative) is clearly documented in the member’s initial ICP.

**Data Element D**

- MMPs should include all ICPs that meet the criteria outlined in data element D, regardless of whether the members are disenrolled as of the end of the reporting period (i.e., include all ICPs regardless of whether the members are currently enrolled or disenrolled as of the last day of the reporting period).
- Data element D should include all existing ICPs that were revised during the reporting period. MMPs should refer to the California three-way contract for specific requirements pertaining to updating the ICP.
- Only ICPs that included participation from the member (or his/her authorized representative) in the revision to the ICP should be reported.
- If a member’s ICP is revised multiple times during the same reporting period, each revision should be reported in data element D.
  - For example, if a member’s ICP is revised twice during the same reporting period, two ICPs should be counted in data element D.
Data Element F

- MMPs should only include ICPs in data element F when a new or previously documented care goal is discussed with the member (or his/her authorized representative) and is clearly documented in the member’s revised ICP.
- If the initial ICP clearly documented the discussion of care goals, but those existing care goals were not revised or discussed, or new care goals are not discussed and documented during the revision of the ICP, then that ICP should not be reported in data element F.

General Guidance

- If a member has an initial ICP completed during the reporting period, and has their ICP revised during the same reporting period, then the member’s initial ICP should be reported in data element A and the member’s revised ICP should be reported in data element D.

F. Data Submission – how MMPs will submit data collected to CMS and the state.

- MMPs will submit data collected for this measure in the above specified format through a secure data collection site established by CMS. This site can be accessed at the following web address: https://Financial-Alignment-Initiative.NORC.org.

CA1.7 Members receiving Medi-Cal specialty mental health services that received care coordination with the primary mental health provider.

<table>
<thead>
<tr>
<th>CONTINUOUS REPORTING</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Reporting Section</strong></td>
</tr>
<tr>
<td>CA1. Care Coordination</td>
</tr>
</tbody>
</table>
A. Data element definitions – details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

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<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of members receiving Medi-Cal specialty mental health services.</td>
<td>Total number of members who have been continuously enrolled in the same MMP for at least five months during the reporting period and who have received Medi-Cal specialty mental health services for three or more consecutive months during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of members for whom the MMP was unable to reach the member’s county mental health provider/county clinic, following at least three documented outreach attempts, for the purpose of care coordination of the member’s mental health needs.</td>
<td>Of the total reported in A, the number of members for whom the MMP was unable to reach the member’s county mental health provider/county clinic, following at least three documented outreach attempts, for the purpose of care coordination of the member’s mental health needs during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Note: Is a subset of A.</td>
<td></td>
</tr>
<tr>
<td>C.</td>
<td>Total number of members for whom the MMP successfully contacted the member’s county mental health provider/county clinic for the purpose of care coordination of the member’s mental health needs.</td>
<td>Of the total reported in A, the number of members for whom the MMP successfully contacted the member’s county mental health provider/county clinic for the purpose of care coordination of the member’s mental health needs during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Note: Is a subset of A.</td>
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<td>Element Letter</td>
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</tr>
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<td>----------------</td>
<td>------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>D.</td>
<td>Total number of members the MMP was unable to reach, following at least three documented outreach attempts, for the purpose of care coordination of the member’s mental health needs.</td>
<td>Of the total reported in A, the number of members the MMP was unable to reach, following at least three documented outreach attempts, for the purpose of care coordination of the member’s mental health needs during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Note: Is a subset of A.</td>
<td></td>
</tr>
<tr>
<td>E.</td>
<td>Total number of members the MMP successfully contacted for the purpose of care coordination of the member’s mental health needs.</td>
<td>Of the total reported in A, the number of members the MMP successfully contacted for the purpose of care coordination of the member’s mental health needs during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Note: Is a subset of A.</td>
<td></td>
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</table>

B. QA Checks/Thresholds – procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- The quality withhold benchmark for DY 3 is the performance rate achieved by the highest scoring MMP minus 10 percentage points. For more information, refer to the Quality Withhold Technical Notes (DY 2-5): California-Specific Measures.

C. Edits and Validation Checks – validation checks that should be performed by each MMP prior to data submission.

- MMPs should validate that data elements B, C, D, and E are less than or equal to data element A.

D. Analysis – how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will evaluate the percentage of members who have been continuously enrolled in the same MMP for at least five months during the reporting period and who have received Medi-Cal specialty mental health services for three or more consecutive months during the reporting period:

- For whom the MMP successfully contacted the member’s county mental health provider/county clinic for the purpose of care coordination of the member’s mental health needs during the reporting period.

  - Percentage = (C / A) * 100
• For whom the member’s county mental health provider/county clinic could be reached and who the MMP was able to successfully contact for the purpose of care coordination of the member’s mental health needs during the reporting period.
  o Percentage = \( \frac{C}{(A - B)} \times 100 \)
• Who the MMP successfully contacted for the purpose of care coordination of the member’s mental health needs during the reporting period.
  o Percentage = \( \frac{E}{A} \times 100 \)
• Who could be reached and who the MMP was able to successfully contact for the purpose of care coordination of the member’s mental health needs during the reporting period.
  o Percentage = \( \frac{E}{(A - D)} \times 100 \)

E. Notes – additional clarifications to a reporting section. This section incorporates newly answered frequently asked questions.

Definition
• Medi-Cal specialty mental health services are financed and administered by county agencies under the provisions of the 1915(b) SMHS waiver. For more information, including a list of specialty mental health services, refer to the Coordinated Care Initiative and Behavioral Health Services Fact Sheet available at: http://www.calduals.org/wp-content/uploads/2013/03/FAQ-BH.pdf

Data Element A
• MMPs should include all members who meet the criteria outlined in data element A, regardless of whether they are disenrolled as of the end of the reporting period (i.e., include all members regardless of whether they are currently enrolled or disenrolled as of the last day of the reporting period).
• To identify members who have received Medi-Cal specialty mental health services for three or more consecutive months during the reporting period, MMPs should refer to information provided by the county agencies and/or claims data provided by the State.

Data Element B
• For data element B, the MMP should only report those members for whom the MMP was unable to reach the member’s county mental health provider/county clinic following at least three documented outreach attempts for the purpose of care coordination of the member’s mental health needs during the reporting period. Documentation of outreach attempts must include:
  o The name of the member’s county mental health provider/county clinic;
  o The name of the person the MMP attempted to contact at the member’s county mental health provider/county clinic;
  o The time and date of the outreach attempt;
  o The method of the outreach attempt (e.g., phone, email, fax, in-person, etc.);
The outcome of the outreach attempt.

Data Element C

- For data element C, successful contact occurs when the MMP and county provider discuss diagnoses (including medical, behavioral, and social needs), review treatment plans, and/or coordinate mental health services provided by the county provider with any of the services (e.g., medical, LTSS, etc.) provided by the MMP. This exchange of information may be conducted via phone, secure email, fax, or in person.
- If the county provider is reached but is not able to discuss the member’s case at that time (e.g., due to lack of signed release), then the contact is not considered successful, but may be counted as an outreach attempt.
- If the member’s county mental health provider/county clinic was not reached after three outreach attempts, but then subsequently is successfully contacted during the reporting period for the purpose of care coordination of the member’s mental health needs, then the member should be counted in data element C.

Data Element D

- For data element D, the MMP should only report those members the MMP was unable to reach following at least three outreach attempts to contact the member for the purpose of care coordination of the member’s mental health needs during the reporting period. Documentation of outreach attempts must include:
  - The time and date of the outreach attempt.
  - The method of the outreach attempt (e.g., phone, email, fax, in-person, etc.).
  - The outcome of the outreach attempt.

Data Element E

- For data element E, successful contact occurs when the MMP and member discuss the member’s mental health needs and services, and how those services may be coordinated with other services (e.g., medical, LTSS, etc.) provided by the MMP. This discussion may be conducted via phone, secure email, fax, or in person.
- If the member was not reached after three outreach attempts, but then subsequently is successfully contacted during the reporting period for the purpose of care coordination of the member’s mental health needs, then the member should be counted in data element E.

General Guidance

- Data elements B and C are mutually exclusive (i.e., the same member should not be counted in both data elements B and C).
- Data elements D and E are mutually exclusive (i.e., the same member should not be counted in both data elements D and E).
• Data elements B and C are not mutually exclusive with data elements D and E.
  o For example, if a member's county mental health provider/county clinic was not reached after three outreach attempts, but the member was successfully contacted during the reporting period for the purpose of care coordination of his/her mental health needs, then the member would be reported in both data elements B and E.

• The MMP does not have to conduct separate outreach to the member for the specific purpose of care coordination of the member’s mental health needs (i.e., the MMP may discuss the member’s mental health needs as part of its broader care coordination efforts, such as when conducting the health risk assessment or developing the care plan). If the MMP discusses the member’s mental health needs when conducting the health risk assessment or developing the care plan (or as part of other care coordination efforts), the MMP must clearly document the outcome of the interaction with the member, following the instructions for documenting outreach attempts as noted above.

• The outreach attempts are meant to coordinate the mental health services being provided at the county with any of the services (e.g., medical, LTSS, etc.) that the MMP is providing.

• For information about care coordination expectations, MMPs should refer to the California three-way contract, which delineates care coordination requirements in several sections. The contract also highlights the California Welfare and Institutions (WIC) Code for the definition and administration of care coordination (see WIC Sections 14182.17(d)(4) and 14186(b)). MMPs are encouraged to reference the contract and the WIC code for guidance on care coordination for all members, including members receiving Medi-Cal specialty mental health services.

F. Data Submission – how MMPs will submit data collected to CMS and the state.

• MMPs will submit data collected for this measure in the above specified format through a secure data collection site established by CMS. This site can be accessed at the following web address: https://Financial-Alignment-Initiative.NORC.org.

CA1.8 Unmet Need in IHSS. – Retired

CA1.9 IHSS social worker contact with member. – Retired

CA1.10 Satisfaction with IHSS social worker, home workers, personal care. – Retired
CA1.11 Members with first follow-up visit within 30 days after hospital discharge.

### CONTINUOUS REPORTING

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Periods</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA1. Care Coordination</td>
<td>Annually</td>
<td>Contract</td>
<td>Calendar Quarters Ex: 1/1-3/31 4/1-6/30 7/1-9/30 10/1-12/31</td>
<td>By the end of the fourth month following the last day of the final quarterly reporting period</td>
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</table>

A. Data element definitions – details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

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<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of acute inpatient hospital discharges.</td>
<td>Total number of acute inpatient hospital discharges that occurred during the reporting period for members who were continuously enrolled from the date of the inpatient hospital discharge through 30 days after the inpatient hospital discharge with no gaps in enrollment.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of acute inpatient hospital discharges that resulted in an ambulatory care follow-up visit within 30 days after discharge from the inpatient hospital stay.</td>
<td>Of the total reported in A, the number of acute inpatient hospital discharges that resulted in an ambulatory care follow-up visit within 30 days after discharge from the inpatient hospital stay.</td>
<td>Field Type: Numeric Note: Is a subset of A.</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds – procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.
C. Edits and Validation checks – validation checks that should be performed by each MMP prior to data submission.

- MMPs should validate that data element B is less than or equal to data element A.

D. Analysis – how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will:

- Evaluate the percentage of acute inpatient hospital discharges that resulted in an ambulatory care follow-up visit within 30 days after discharge from the inpatient hospital stay.
  - Percentage = \(\frac{B}{A}\) * 100
- Use enrollment data to evaluate the total number of acute inpatient hospital discharges per 10,000 member months during the reporting period.
  - Rate = \(\frac{A}{\text{Total Member Months}}\) * 10,000

E. Notes – additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

**Data Element A**

- MMPs should include all inpatient hospital discharges for members who meet the criteria outlined in data element A, regardless of whether they are disenrolled as of the end of the reporting period.
- The denominator for this measure is based on inpatient hospital discharges, not members.
- To identify all acute inpatient hospital discharges during the reporting period:
  - Identify all acute and nonacute inpatient stays (Inpatient Stay value set).
  - Exclude nonacute inpatient stays (Nonacute Inpatient Stay value set).
  - Identify the discharge date for the stay. The date of discharge must be within the reporting period.
  - Report on all inpatient stays identified with discharges within the reporting period, including denied and pended claims.
  - Additionally, MMPs should use UB Type of Bill codes 11x, 12x, 41x, and 84x or any acute inpatient facility code to identify discharges from an inpatient hospital stay.
- If the discharge is followed by readmission or direct transfer to an acute inpatient care setting within the 30-day follow-up period, count only the last discharge for reporting in data element A. To identify readmissions and direct transfers to an acute inpatient care setting:
  - Identify all acute and nonacute inpatient stays (Inpatient Stay value set).
  - Exclude nonacute inpatient stays (Nonacute Inpatient Stay value set).
  - Identify the admission date for the stay.
Data Element A Exclusions

- Exclude discharges for members who use hospice services or elect to use a hospice benefit at any time between the hospital discharge date and 30 days following the hospital discharge. These members may be identified using various methods, which may include but are not limited to enrollment data, medical record or claims/encounter data (Hospice value set).
- Exclude discharges due to death, using the Discharges due to Death value set.
- Exclude from data element A any discharges followed by readmission or direct transfer to a nonacute inpatient care setting within the 30-day follow-up period. To identify readmissions and direct transfers to a nonacute inpatient care setting:
  - Identify all acute and nonacute inpatient stays (Inpatient Stay value set).
  - Confirm the stay was for nonacute care based on the presence of a nonacute code (Nonacute Inpatient Stay value set) on the claim.
  - Identify the admission date for the stay.
These discharges are excluded from the measure because rehospitalization or direct transfer may prevent an outpatient follow-up visit from taking place.
- For example, the following direct transfers/readmissions should be excluded from this measure:
  - An inpatient discharge on June 1, followed by an admission to another inpatient setting on June 1 (a direct transfer).
  - An inpatient discharge on June 1, followed by a readmission to a hospital on June 15 (readmission within 30 days).

Data Element B

- The date of discharge must occur within the reporting period, but the follow-up visit may or may not occur in the same reporting period.
  - For example, if a discharge occurs during the last month of the reporting period, look to the first month of the following reporting period to identify the follow-up visit.
- A follow-up visit is defined as an ambulatory care follow-up visit to assess the member’s health following a hospitalization. Codes to identify follow-up visits are provided in the Ambulatory Visits value set and Other Ambulatory Visits value set.
- MMPs should report ambulatory care follow-up visits based on all visits identified, including denied and pended claims, and including encounter data as necessary in cases where follow-up care is included as part of a bundled payment covering the services delivered during the inpatient stay. MMPs should use all information available, including encounter data supplied by providers, to ensure complete and accurate reporting.
F. Data Submission – how MMPs will submit data collected to CMS and the state.

- MMPs will submit data collected for this measure in the above specified format through a secure data collection site established by CMS. This site can be accessed at the following web address: https://Financial-Alignment-Initiative.NORC.org.

CA1.12 Members who have a care coordinator and have at least one care team contact during the reporting period.i, ii

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Period</th>
<th>Due Date</th>
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<tbody>
<tr>
<td>CA1. Care Coordination</td>
<td>Annually</td>
<td>Contract</td>
<td>Calendar Year</td>
<td>By the end of the second month following the last day of the reporting period</td>
</tr>
</tbody>
</table>

A. Data element definitions – details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of members who have/had a care coordinator.</td>
<td>Total number of members continuously enrolled for six months during the reporting period with no gaps in enrollment who have/had a care coordinator during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of members who had at least one care coordinator or other care team contact.</td>
<td>Of the total reported in A, the number of members who had at least one care coordinator or other care team contact.</td>
<td>Field Type: Numeric Note: Is a subset of A.</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds – procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- The quality withhold benchmark is 78% for DY 2 and 3, 83% for DY 4, and 88% for DY 5. For more information, refer to the Quality Withhold Technical Notes (DY 2-5): California-Specific Measures.
C. Edits and Validation checks – validation checks that should be performed by each MMP prior to data submission.
   • MMPs should validate that data element B is less than or equal to data element A.

D. Analysis – how CMS and the state will evaluate reported data, as well as how other data sources may be monitored.
   • CMS and the state will evaluate the percentage of members with a care coordinator who had at least one care coordinator or other care team contact during the reporting period.
     ○ Percentage = (B / A) * 100

E. Notes – additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

Data Element A
   • MMPs should include all members who meet the criteria outlined in data element A, regardless of whether they are disenrolled as of the end of the reporting period (i.e., include all members regardless of whether they are currently enrolled or disenrolled as of the last day of the reporting period).

Data Element B
   • The contact can be from the care coordinator or another member of the care team, depending on the member’s needs.
   • MMPs should include only successful care coordinator or other care team contacts in data element B.
   • MMPs should refer to the California three-way contract for specific requirements pertaining to the care team.
   • For the purposes of reporting this measure, care coordinator or care team contact includes a discussion by phone or in person between the member or the member’s authorized representative and the care coordinator or care team.
   • Communication via secure emails or mailing/receiving completed HRAs via mail are not acceptable forms of contact for the purposes of reporting this measure.

F. Data Submission – how MMPs will submit data collected to CMS and the state.
   • MMPs will submit data collected for this measure in the above specified format through a secure data collection site established by CMS. This site can be accessed at the following web address: https://Financial-Alignment-Initiative.NORC.org.
Section CAII. Enrollee Protections

CA2.1 The number of critical incident and abuse reports for members receiving LTSS.

<table>
<thead>
<tr>
<th>IMPLEMENTATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporting Section</td>
</tr>
<tr>
<td>CA2. Enrollee Protections</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ONGOING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporting Section</td>
</tr>
<tr>
<td>CA2. Enrollee Protections</td>
</tr>
</tbody>
</table>

A. Data element definitions - details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of members receiving IHSS.</td>
<td>Total number of members receiving IHSS during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of members receiving CBAS.</td>
<td>Total number of members receiving CBAS during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>C.</td>
<td>Total number of members receiving MSSP services.</td>
<td>Total number of members receiving MSSP services during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>Element Letter</td>
<td>Element Name</td>
<td>Definition</td>
<td>Allowable Values</td>
</tr>
<tr>
<td>----------------</td>
<td>-----------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>D</td>
<td>Total number of members receiving nursing facility (NF) services.</td>
<td>Total number of members receiving NF services during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>E</td>
<td>Total number of critical incident and abuse reports among members receiving IHSS.</td>
<td>Of the total reported in A, the number of critical incident and abuse reports during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>F</td>
<td>Total number of critical incident and abuse reports among members receiving CBAS.</td>
<td>Of the total reported in B, the number of critical incident and abuse reports during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>G</td>
<td>Total number of critical incident and abuse reports among members receiving MSSP services.</td>
<td>Of the total reported in C, the number of critical incident and abuse reports during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>H</td>
<td>Total number of critical incident and abuse reports among members receiving NF services.</td>
<td>Of the total reported in D, the number of critical incident and abuse reports during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds – procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.
- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.

C. Edits and Validation checks – validation checks that should be performed by each MMP prior to data submission.
- N/A.

D. Analysis – how CMS and the state will evaluate reported data, as well as how other data sources may be monitored. CMS and the state will evaluate the number of critical incident and abuse reports per 1,000 members receiving the following during the reporting period:
- IHSS.
  - Rate = (E / A) * 1,000
• CBAS.
  o Rate = (F / B) * 1,000
• MSSP services.
  o Rate = (G / C) * 1,000
• NF services.
  o Rate = (H / D) * 1,000

E. Notes – additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

Definitions

• Critical incident refers to any actual or alleged event or situation that creates a significant risk of substantial or serious harm to the physical or mental health, safety or well-being of a member.
• Abuse refers to:
  o Willful use of offensive, abusive, or demeaning language by a caretaker that causes mental anguish;
  o Knowing, reckless, or intentional acts or failures to act which cause injury or death to an individual or which places that individual at risk of injury or death;
  o Rape or sexual assault;
  o Corporal punishment or striking of an individual;
  o Unauthorized use or the use of excessive force in the placement of bodily restraints on an individual; and
  o Use of bodily or chemical restraints on an individual which is not in compliance with federal or state laws and administrative regulations.

• Community Based Adult Services (CBAS) is an outpatient, facility-based program that delivers skilled nursing care, social services, therapies, personal care, family/caregiver training and support, nutrition services, and transportation to eligible Medi-Cal beneficiaries, aged 18 years and older, blind, or disabled.

• Multi-Purpose Senior Services Program (MSSP) is a California-specific program, the 1915(c) Home and Community-Based services waiver that provides HCBS to Medi-Cal eligible individuals who are 65 years or older with disabilities as an alternative to nursing facility placement.
• Nursing facility (NF) services include any type of nursing facility care, including skilled and custodial services.

Data Elements A, B, C, and D

• MMPs should include all members who meet the criteria outlined in data elements A, B, C, and D regardless of whether they are disenrolled as of the end of the reporting period (i.e., include all members regardless of whether they are currently enrolled or disenrolled as of the last day of the reporting period).
• For quarterly reporting, if a member is enrolled at any point in time during the reporting period and received one of the specified categories of services, he/she should be included in this measure.
• It may be possible for a member to receive services from IHSS, CBAS, MSSP, and/or NF during the same quarterly reporting period. Certain services, such as NF services, cannot be received during the same month as IHSS, CBAS, and MSSP services, but they can be received during sequential months during the same quarterly reporting period.

• If a member receives services from more than one type of LTSS, they should be reported in all applicable data elements.
  o For example, if a member received both IHSS and MSSP services during the same reporting period, he/she would be reported in data elements A and C.

Data Elements E, F, G and H

• For data elements E through H, MMPs should include all new critical incident and abuse cases that are reported during the reporting period, regardless of whether the case status is open or closed as of the last day of the reporting period.

• Critical incident and abuse reports could be reported by the MMP or any provider and are not limited to only those providers defined as LTSS providers.

• It is possible for members to have more than one critical incident and/or abuse report during the reporting period. All new critical incident and abuse reports during the reporting period should be counted.

• MMPs should report the critical incident/abuse report for the service during which the incident or abuse occurred.
  o For example, if the member had a reported critical incident while receiving MSSP services, the critical incident would be reported in data element G only.

• If the member received multiple services during the reporting period, the critical incident/abuse should only be reported once and MMPs should use their best judgment on which data element to report the critical incident/abuse.

F. Data Submission – how MMPs will submit data collected to CMS and the state.

• MMPs will submit data collected for this measure in the above specified format through a secure data collection site established by CMS. This site can be accessed at the following web address: https://Financial-Alignment-Initiative.NORC.org.
CA2.2 Policies and procedures attached to the MOU with county behavioral health agency(ies) around assessments, referrals, coordinated care planning, and information sharing.¹

<table>
<thead>
<tr>
<th>CONTINUOUS REPORTING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporting Section</td>
</tr>
<tr>
<td>CA2. Enrollee Protections</td>
</tr>
</tbody>
</table>

A. Data element definitions – details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Policies and procedures attached to the MOU with county behavioral health agency(ies) around assessments, referrals, coordinated care planning, and information sharing</td>
<td>Policies and procedures attached to the MOU with county behavioral health agency(ies) around assessments, referrals, coordinated care planning, and information sharing</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds – procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.

C. Edits and Validation checks – validation checks that should be performed by each MMP prior to data submission.

- Confirm that the appropriate policies and procedures submitted align with the MOU(s) with county behavioral health agency(ies).

D. Analysis – how CMS and the state will evaluate reported data, as well as how other data sources may be monitored.

- CMS and the state will verify that the policies and procedures contain, at a minimum, the roles and responsibilities of the MMP and the county behavioral health agency(ies) regarding assessments, referrals, coordinated care planning, and information sharing.
E. Notes – additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

- These policies and procedures should be specific to each MMP/county behavioral health agency(ies) and reflect the appropriate roles and responsibilities of each organization.

F. Data Submission – how MMPs will submit data collected to CMS and the state.

- Data will be submitted directly to the state via email to: pmmp.monitoring@dhcs.ca.gov
Section CAILI. Organizational Structure and Staffing

CA3.1 MMPs with an established physical access compliance policy and identification of an individual who is responsible for physical access compliance.\(^1\) – Retired

CA3.2 Care coordinator training for supporting self-direction under the demonstration.

<table>
<thead>
<tr>
<th>CONTINUOUS REPORTING</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Reporting Section</strong></td>
</tr>
<tr>
<td>CA3. Organizational Structure and Staffing</td>
</tr>
</tbody>
</table>

A. Data element definitions – details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of care coordinators who have been employed by the MMP for at least 30 days.</td>
<td>Total number of full-time and part-time care coordinators who have been employed by the MMP for at least 30 days at any point during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of care coordinators that have undergone training for supporting self-direction under the demonstration within the reporting period.</td>
<td>Of the total reported in A, the number of care coordinators that have undergone training for supporting self-direction under the demonstration within the reporting period.</td>
<td>Field Type: Numeric, Note: Is a subset of A.</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds – procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.
C. Edits and Validation checks – validation checks that should be performed by each MMP prior to data submission.
   - MMPs should validate that data element B is less than or equal to data element A.

D. Analysis – how CMS and the state will evaluate reported data, as well as how other data sources may be monitored.
   - CMS and the state will evaluate the percentage of full-time and part-time care coordinators who have undergone training for supporting self-direction within the reporting period.
     - Percentage = (B / A) * 100

E. Notes – additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

Data Element A
   - If a care coordinator was not currently with the MMP at the end of the reporting period but was with the MMP for at least 30 days at any point during the reporting period, they should be included in this measure.

General Guidance
   - MMPs should refer to the California three-way contract for specific requirements pertaining to care coordinators and training for supporting self-direction.

F. Data Submission – how MMPs will submit data collected to CMS and the state.
   - MMPs will submit data collected for this measure in the above specified format through a secure data collection site established by CMS. This site can be accessed at the following web address: https://Financial-Alignment-Initiative.NORC.org.
Section CAIV. Utilization

CA4.1 Reduction in emergency department (ED) use for seriously mentally ill (SMI) and substance use disorder (SUD) members.ii

<table>
<thead>
<tr>
<th>Reporting Section</th>
<th>Reporting Frequency</th>
<th>Level</th>
<th>Reporting Period</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA4. Utilization</td>
<td>Annually</td>
<td>Contract</td>
<td>Calendar Year, beginning in CY2</td>
<td>By the end of the fourth month following the last day of the reporting period</td>
</tr>
</tbody>
</table>

A. Data element definitions – details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of members enrolled for at least five months, with an indication of either (SMI) or SUD.</td>
<td>Total number of members continuously enrolled for at least five months during the reporting period, with no gaps in enrollment, with an indication of either SMI or SUD problems during the 12 months prior to the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of member months.</td>
<td>Of the total reported in A, the number of member months during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>C.</td>
<td>Total number of ED visits.</td>
<td>Of the total reported in A, the number of ED visits during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds – procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- The quality withhold benchmark for DY 2 through 5 is a 10% decrease in the performance rate for the measurement year compared to the performance rate for the baseline year. For more information, refer to the Quality Withhold Technical Notes (DY 2-5): California-Specific Measures.
C. Edits and Validation checks – validation checks that should be performed by each MMP prior to data submission.
   - Each member should have a member month value between 5 and 12. A value greater than 12 is not acceptable.

D. Analysis – how CMS and the state will evaluate reported data, as well as how other data sources may be monitored.
   - CMS and the state will evaluate the number of ED visits for members with an indication of either SMI or SUD problems during the 12 months prior to the reporting period per 1,000 member months.
     - Rate = (C / B) * 1,000

E. Notes – additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

Definitions
   - A member with SMI is defined as someone with a mental illness diagnosis in Medicare or Medicaid claims in the 12 months prior to the reporting period (Mental Health Diagnosis value set).
     - In the case where the member enrolled for the first time within the reporting period (e.g., February 1, 2018 or later in 2018), MMPs can use Medicare or Medicaid claims in the 12 months prior to the member’s effective enrollment date to identify a SMI diagnosis.
   - A member with SUD is defined as someone with a SUD diagnosis in Medicare or Medicaid claims in the 12 months prior to the reporting period (AOD Abuse and Dependence value set).
     - In the case where the member enrolled for the first time within the reporting period (e.g., February 1, 2018 or later in 2018), MMPs can use Medicare or Medicaid claims in the 12 months prior to the member’s effective enrollment date to identify a SUD diagnosis.
   - Member months refers to the number of months each Medicare-Medicaid member was enrolled in the MMP in the year.

Data Element A
   - MMPs should include all members who meet the criteria outlined in data element A, regardless of whether they are disenrolled as of the end of the reporting period (i.e., include all members regardless of whether they are currently enrolled or disenrolled as of the last day of the reporting period).
   - Members diagnosed with SMI and/or SUD should be included in this measure (i.e., members with both SMI and SUD diagnoses should also be included).
   - MMPs should include all members with any diagnosis of SMI and/or SUD, regardless of whether the diagnosis of SMI and/or SUD is the primary diagnosis on the claim.

Data Element B
   - Each member should have a member month value between 5 and 12. A value greater than 12 is not acceptable.
• Determine member months using the 15th of the month. This date must be used consistently from member to member, month to month, and from year to year.
  o For example, if Ms. X is enrolled in the MMP as of January 15, Ms. X contributes one member month in January.

Data Element C Exclusion

• MMPs should exclude ED visits (ED value set) or observation stays (Observation value set) that resulted in an inpatient stay (Inpatient Stay value set). An ED visit or observation stay results in an inpatient stay when the ED/observation date of service and the admission date for the inpatient stay are one calendar day apart or less.

F. Data Submission – how MMPs will submit data collected to CMS and the state.

• MMPs will submit data collected for this measure in the above specified format through a secure data collection site established by CMS. This site can be accessed at the following web address: https://Financial-Alignment-Initiative.NORC.org.

CA4.2 In-Home Supportive Services (IHSS) utilization. – Retired

CA4.3 Readmissions of short- and long-stay nursing facility residents after hospitalization for diabetes, chronic obstructive pulmonary disease (COPD) or any medical diagnosis.

<table>
<thead>
<tr>
<th>CONTINUOUS REPORTING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporting Section</td>
</tr>
<tr>
<td>CA4. Utilization</td>
</tr>
</tbody>
</table>

A. Data element definitions – details for each data element reported to CMS and the state, including examples, calculation methods, and how various data elements are associated.

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of short-term stay nursing facility (NF) residents.</td>
<td>Total number of short-term stay NF residents who were continuously enrolled in the MMP during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>Element Letter</td>
<td>Element Name</td>
<td>Definition</td>
<td>Allowable Values</td>
</tr>
<tr>
<td>---------------</td>
<td>------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>B.</td>
<td>Total number of short-term stay NF residents with diabetes.</td>
<td>Of the total reported in A, the number of short-term stay NF residents with diabetes.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Note: Is a subset of A.</td>
<td></td>
</tr>
<tr>
<td>C.</td>
<td>Total number of short-term stay NF residents with chronic obstructive pulmonary disease (COPD).</td>
<td>Of the total reported in A, the number of short-term stay NF residents with COPD.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Note: Is a subset of A.</td>
<td></td>
</tr>
<tr>
<td>D.</td>
<td>Total number of transfers for short-term stay NF residents who were transferred from the NF and admitted to an acute care hospital for any medical diagnosis and who were subsequently discharged back to any NF.</td>
<td>For the members reported in A, the number of transfers for short-term stay NF residents who were transferred from the NF and admitted to an acute care hospital for any medical diagnosis and who were subsequently discharged back to any NF during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>E.</td>
<td>Total number of transfers for short-term stay NF residents with diabetes who were transferred from the NF and admitted to an acute care hospital for diabetes and who were subsequently discharged back to any NF.</td>
<td>For the members reported in B, the number of transfers for short-term stay NF residents with diabetes who were transferred from the NF and admitted to an acute care hospital for diabetes and who were subsequently discharged back to any NF during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>Element Letter</td>
<td>Element Name</td>
<td>Definition</td>
<td>Allowable Values</td>
</tr>
<tr>
<td>----------------</td>
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<td>-----------------</td>
</tr>
<tr>
<td>F.</td>
<td>Total number of transfers for short-term stay NF residents with COPD who were transferred from the NF and admitted to an acute care hospital for COPD and who were subsequently discharged back to any NF.</td>
<td>For the members reported in C, the number of transfers for short-term stay NF residents with COPD who were transferred from the NF and admitted to an acute care hospital for COPD and who were subsequently discharged back to any NF during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>G.</td>
<td>Total number of long-term stay NF residents.</td>
<td>Total number of long-term stay NF residents who were continuously enrolled in the MMP during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>H.</td>
<td>Total number of long-term stay NF residents with diabetes.</td>
<td>Of the total reported in G, the number of long-term stay NF residents with diabetes.</td>
<td>Field Type: Numeric Note: Is a subset of G.</td>
</tr>
<tr>
<td>I.</td>
<td>Total number of long-term stay NF residents with COPD.</td>
<td>Of the total reported in G, the number of long-term stay NF residents with COPD.</td>
<td>Field Type: Numeric Note: Is a subset of G.</td>
</tr>
<tr>
<td>J.</td>
<td>Total number of transfers for long-term stay NF residents who were transferred from the NF and admitted to an acute care hospital for any medical diagnosis and who were subsequently discharged back to any NF.</td>
<td>For the members reported in G, the number of transfers for long-term stay NF residents who were transferred from the NF and admitted to an acute care hospital for any medical diagnosis and who were subsequently discharged back to any NF during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>Element Letter</td>
<td>Element Name</td>
<td>Definition</td>
<td>Allowable Values</td>
</tr>
<tr>
<td>----------------</td>
<td>-----------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------</td>
</tr>
<tr>
<td>K.</td>
<td>Total number of transfers for long-term stay NF residents with diabetes who were transferred from the NF and admitted to an acute care hospital for diabetes and who were subsequently discharged back to any NF.</td>
<td>For the members reported in H, the number of transfers for long-term stay NF residents with diabetes who were transferred from the NF and admitted to an acute care hospital for diabetes and who were subsequently discharged back to any NF during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>L.</td>
<td>Total number of transfers for long-term stay NF residents with COPD who were transferred from the NF and admitted to an acute care hospital for COPD and who were subsequently discharged back to any NF.</td>
<td>For the members reported in I, the number of transfers for long-term stay NF residents with COPD who were transferred from the NF and admitted to an acute care hospital for COPD and who were subsequently discharged back to any NF during the reporting period.</td>
<td>Field Type: Numeric</td>
</tr>
</tbody>
</table>

B. QA Checks/Thresholds – procedures used by CMS and the state to establish benchmarks in order to identify outliers or data that are potentially erroneous.

- CMS and the state will perform an outlier analysis.
- As data are received from MMPs over time, CMS and the state will apply threshold checks.

C. Edits and Validation checks – validation checks that should be performed by each MMP prior to data submission.

- MMPs should validate that data elements B and C are less than or equal to data element A.
- MMPs should validate that data elements H and I are less than or equal to data element G.
D. Analysis – how CMS and the state will evaluate reported data, as well as how other data sources may be monitored.

**Short-Term Stay Analysis**

CMS and the state will evaluate the number of transfers among short-term stay NF residents:

- Who were transferred from the NF and admitted to an acute care hospital for any medical diagnosis and who were subsequently discharged back to any NF during the reporting period per 100 short-term stay NF residents.
  
  \[ \text{Rate} = \left( \frac{D}{A} \right) \times 100 \]

- With diabetes who were transferred from the NF and admitted to an acute care hospital for diabetes and who were subsequently discharged back to any NF during the reporting period per 100 short-term stay NF residents with diabetes.
  
  \[ \text{Rate} = \left( \frac{E}{B} \right) \times 100 \]

- With COPD who were transferred from the NF and admitted to an acute care hospital for COPD and who were subsequently discharged back to any NF during the reporting period per 100 short-term stay NF residents with COPD.
  
  \[ \text{Rate} = \left( \frac{F}{C} \right) \times 100 \]

**Long-Term Stay Analysis**

CMS and the state will evaluate the number of transfers among long-term stay NF residents:

- Who were transferred from the NF and admitted to an acute care hospital for any medical diagnosis and who were subsequently discharged back to any NF during the reporting period per 100 long-term stay NF residents.
  
  \[ \text{Rate} = \left( \frac{J}{G} \right) \times 100 \]

- With diabetes who were transferred from the NF and admitted to an acute care hospital for diabetes and who were subsequently discharged back to any NF during the reporting period per 100 long-term stay NF residents with diabetes.
  
  \[ \text{Rate} = \left( \frac{K}{H} \right) \times 100 \]

- With COPD who were transferred from the NF and admitted to an acute care hospital for COPD and who were subsequently discharged back to any NF during the reporting period per 100 long-term stay NF residents with COPD.
  
  \[ \text{Rate} = \left( \frac{L}{I} \right) \times 100 \]

E. Notes – additional clarifications to a reporting section. This section incorporates previously answered frequently asked questions.

**Definitions**

- A **short-term stay resident** is defined as having resided in the nursing facility for less than or equal to 100 cumulative days.

- A **long-term stay resident** is defined as having resided in the nursing facility for greater than 100 cumulative days.
Data Elements A and G

- Continuous enrollment is defined as no more than one gap in enrollment of up to 45 days during the reporting period (i.e., January through December). To determine continuous enrollment for a member for whom enrollment is verified monthly, the member may not have more than a 1-month gap in coverage (i.e., a member whose coverage lapses for 2 months [60 days] is not considered continuously enrolled).

Data Elements B and H

- There are two ways for MMPs to identify members with diabetes: claim/encounter data and pharmacy data. The MMP must use both methods to identify the eligible population, but a member only needs to be identified by one method to be included in the measure. Members may be identified as having diabetes during the current reporting period or the year prior to the current report period.
  - **Claim/encounter data.** Members who met any of the following criteria during the current reporting period or the year prior to the current reporting period (count services that occur over both years):
    - At least two visits of any combination of outpatient visits (Outpatient value set), observation visits (Observation value set), ED visits (ED value set), or nonacute inpatient encounters (Nonacute Inpatient value set) on different dates of service, with a diagnosis of diabetes (Diabetes value set). Visit type need not be the same for the two visits (e.g., one outpatient visit and one ED visit).
    - At least one acute inpatient encounter (Acute Inpatient value set) with a diagnosis of diabetes (Diabetes value set).
  - **Pharmacy data.** Members who were dispensed insulin or hypoglycemics/antihyperglycemics on an ambulatory basis during the current reporting period or the year prior to the current reporting period (Diabetes Medications List).

Data Elements C and I

- MMPs should identify members with a diagnosis of COPD using claims/encounter data. The member must have at least one diagnosis of COPD (COPD Diagnosis value set) during the reporting period to be captured in data elements C and I.

Data Elements D and J

- When determining members with a transfer from the NF and admission to an acute care hospital for any medical diagnosis (i.e., data elements D and J), include members with diabetes and COPD. In other words, members included in data elements D and J can have diabetes, COPD, and other medical diagnoses such as hypertension, asthma, heart failure, etc.
Data Elements E and K

- To identify a diabetes-related hospital admission, the member must have a primary diagnosis code listed in the Diabetes value set.

Data Elements F and L

- To identify a COPD-related hospital admission, the member must have a primary diagnosis code listed in the COPD Diagnosis value set.

Data Elements D, E, F, J, K, and L

- The date of transfer and the discharge back to any NF must occur within the same reporting period.
- It is possible for a member to have more than one transfer during the reporting period. MMPs should count all transfers that occur for each member during the reporting period.

Data Elements D, E, F, J, K, and L Exclusion

- If a member was transferred to a hospital but only had an ED visit or observation stay then returned to the nursing facility, then the transfer is not counted as an admission to the acute care hospital. A member must be admitted to the hospital to be considered a numerator positive event.

General Guidance

- It is possible for a member to have multiple conditions (i.e., both diabetes and COPD). If a member has both a diabetes and a COPD diagnosis, then these members should be reported in all applicable data elements (i.e., data elements B, C, H, and I).
- MMPs should include sub-acute care facilities and intermediate care facilities as part of NFs, as defined in Title 22 of the California Code of Regulations sections 51120, 51124, and 52224.5.
- MMPs should determine short-term and long-term stay residents using the best information available. MMPs should use their plan experience and, whenever possible, integrate analysis of historical claims data to determine if the member's NF stay qualifies as short-term or long-term.
  o For example, a member may reside in a NF at the time of enrollment (or the first day of the reporting period for reporting periods CY2 and CY3) and the MMP may use historical data to determine the number of days the member has resided in the NF at the time of enrollment (or on the first day of the reporting period).
- When determining a short-term or long-term stay, if a member is transferred from the NF and then is readmitted to any NF within 30 days (including day 30), the transfer and subsequent readmission does not disrupt the count of cumulative days.
For example, if a member is transferred from the NF to the acute care hospital on day 193 and is subsequently readmitted to any NF 24 days later, this will be counted as the same long-term stay episode. The member’s first day back in the NF (i.e., the day the member is readmitted to the NF) will count as day 194 for that episode, not as day 1.

- When determining a short-term or long-term stay, if a member is transferred from the NF and then is readmitted to any NF after 30 days, the date of readmission is the start of a new episode in the NF and will count as day 1 toward the member’s cumulative days in the facility.

F. Data Submission – how MMPs will submit data collected to CMS and the state.

- MMPs will submit data collected for this measure in the above specified format through a secure data collection site established by CMS. This site can be accessed at the following web address: https://Financial-Alignment-Initiative.NORC.org.
IPA Name:  
Reporting Period:  
Date of Submission:  
IPA Contact:

5.1 - Care Coordinator to Member Ratio

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
<th>Field Type: Numeric</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of full time equivalent (FTE) care coordinators working on the Demonstration.</td>
<td>Total number of full time equivalent (FTE) care coordinators working on the Demonstration as of the last day of the reporting period.</td>
<td></td>
<td>Numeric</td>
</tr>
<tr>
<td>B.</td>
<td>Total FTE care coordinators assigned to care management and conducting assessments.</td>
<td>Of the total reported in A, the number of FTE care coordinators assigned to care management and conducting assessments during the reporting period.</td>
<td></td>
<td>Numeric</td>
</tr>
<tr>
<td>C.</td>
<td>Total number of FTE care coordinators that left the MMP.</td>
<td>TOTAL number of FTE care coordinators that left the MMP during the reporting period.</td>
<td></td>
<td>Numeric</td>
</tr>
</tbody>
</table>

CY2018 MMP Core Reporting Requirements, Version October 25, 2017
<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Total number of care coordinators who have been employed by the MMP for at least 30 days.</td>
<td>Total number of care coordinators who have been employed by the MMP for at least 30 days at any point during the reporting period.</td>
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<td>B.</td>
<td>Total number of care coordinators that have undergone training for supporting self-direction under the demonstration within the reporting period.</td>
<td>Of the total reported in A, the number of care coordinators that have undergone training for supporting self-direction under the demonstration within the reporting period.</td>
<td>Field Type: Numeric</td>
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Note: Is a subset of A.
## INLAND EMPIRE HEALTH PLAN
Care Transition Cases Log

| Member First Name | Member Last Name | IEHP Member ID # | DOB | Date Identified | Discharge Date | Discharge Summary Received (Yes/No) | Type of Transition (Planned or Unplanned) | Sending Setting (Home/Hospital/Facility) | Receiving Setting (Home/Hospital/Facility) | Date Sending Setting's care plan was sent to the receiving setting | Date the PCP was notified of the transition | Date Member or responsible party was notified of changes to health status and plan of care | Who is the Consistent Person |
|-------------------|------------------|------------------|-----|----------------|----------------|--------------------------------------|------------------------------------------|-------------------------------------------|------------------------------------------|------------------------------------------|------------------------------------------|------------------------------------------|
|                   |                  |                  |     |                |                |                                      |                                          |                                           |                                          |                                          |                                          |                                          |
|                   |                  |                  |     |                |                |                                      |                                          |                                           |                                          |                                          |                                          |                                          |
|                   |                  |                  |     |                |                |                                      |                                          |                                           |                                          |                                          |                                          |                                          |
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|                   |                  |                  |     |                |                |                                      |                                          |                                           |                                          |                                          |                                          |                                          |
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|                   |                  |                  |     |                |                |                                      |                                          |                                           |                                          |                                          |                                          |                                          |

**Identify the number of:**
Total Cases reported for this month:

---

Delegate Name: ____________________________  Date Submitted: ____________

Report for Month of: ____________________________  Submitted By: ____________________________  Phone #: ____________________________

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INLAND EMPIRE HEALTH PLAN
Care Transition Cases Log

**Revised Date:** 10-30-2014
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## AUDIT RESULTS

### CREDENTIALING ASSESSMENT

#### ELEMENT COMPLIANCE

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### Medi-Cal Elements
- Medi-Cal & Medicare Elements
- Medicare Elements
- NCQA Elements

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CR 1: Credentialing Policies

The IPA documents have a well-defined credentialing and recredentialing process for evaluating and selecting licensed independent practitioners to provide care to its members. The IPA has a rigorous process to select and evaluate practitioners.

Element A: Practitioner Credentialing Guidelines

<table>
<thead>
<tr>
<th>The organization specifies:</th>
<th>Score</th>
</tr>
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<tbody>
<tr>
<td>1 The types of practitioners to credential and recredential</td>
<td>*</td>
</tr>
<tr>
<td>2 The verification sources used</td>
<td>*</td>
</tr>
<tr>
<td>3 The criteria for credentialing and recredentialing</td>
<td>*</td>
</tr>
<tr>
<td>4 The process for making credentialing and recredentialing decisions</td>
<td>*</td>
</tr>
<tr>
<td>5 The process for managing credentialing files that meet the IPA’s established criteria</td>
<td></td>
</tr>
<tr>
<td>6 The process for ensuring that credentialing and recredentialing are conducted in a non-discriminatory manner.</td>
<td>*</td>
</tr>
<tr>
<td>7 The process for notifying a practitioner about any information obtained during the organization’s credentialing process that varies substantially from the information provided to the IPA’s practitioner</td>
<td>*</td>
</tr>
<tr>
<td>8 The process to ensure that practitioners are notified of the credentialing or recredentialing decision within 60 calendar days of the committee’s decision</td>
<td>*</td>
</tr>
<tr>
<td>9 The medical director or other designated physician’s direct responsibility and participation in the credentialing program</td>
<td>*</td>
</tr>
<tr>
<td>10 The process used to ensure the confidentiality of all information obtained in the credentialing process, except as otherwise provided by law</td>
<td>*</td>
</tr>
<tr>
<td>11 The process for ensuring that listings in practitioner directories and other materials for members are consistent with credentialing data, including education, training, board certification and specialty</td>
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| TOTAL |

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<tr>
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<td>The organization meets 8-10 factors</td>
<td>The organization meets 5-7 factors</td>
<td>The organization meets 3-4 factors</td>
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</tr>
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</table>

The organization meets all 11 factors
CR 1: Credentialing Policies (continued)

The IPA’s policies and procedures include the following practitioner rights:
This standard does not require the IPA to allow a practitioner to review references or recommendations, or other information that is peer-review protected.
The types of information about which an IPA would alert practitioners, if there are substantial variations from the practitioner’s information, include:
• Actions on a license
• Malpractice claims history
• Board-certification decisions

Element B: Practitioner Rights

The organization notifies practitioners about their right to:  

<table>
<thead>
<tr>
<th>Score</th>
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<tbody>
<tr>
<td>1</td>
<td>Review information submitted to support their credentialing application</td>
<td>*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Correct erroneous information</td>
<td>*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Receive the status of their credentialing or recredentialing application, upon request</td>
<td>*</td>
<td></td>
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</table>

TOTAL

<table>
<thead>
<tr>
<th>SCORING</th>
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<th>50%</th>
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<tbody>
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<td>The organization meets all 3 factors</td>
<td>The organization meets 2 factors</td>
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<td>The organization meets 1 factor</td>
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</table>

CR 1: Credentialing Policies (continued)

The IPA makes timely recredentialing decisions and incorporates information from quality improvement activities and members complaints in its recredentialing decision-making process

Element C: Performance Monitoring for Recredentialing - CMS/DHCS

The IPA uses practitioner performance information when it makes recredentialing decisions

<table>
<thead>
<tr>
<th>Score</th>
<th>1</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>The IPA recredentialing policies and procedures requires information from quality improvement activities and member complaints in the credentialing decision-making process.</td>
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TOTAL

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CR 1: Credentialing Policies (continued)

The IPA does not employ or contract with physicians who have opted out of participation in the Medicare Program.

Element D: Contracts - Opt-Out Provisions - CMS

<table>
<thead>
<tr>
<th>Score</th>
<th>Opt Out physicians are not employed or contracted by the IPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The IPA has policies and procedures to ensure that it only contracts with physicians who have not opted out and includes the verification source for Medicare Opt-Out *</td>
</tr>
</tbody>
</table>

**TOTAL**

<table>
<thead>
<tr>
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<th>80%</th>
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CR 1: Credentialing Policies (continued)

The IPA does not employ or contract with physicians who have opted out of participation in the Medicare Program.

Element E: Medicare-Exclusions/Sanctions - CMS

| Score | 1 The IPA must have policies and procedures that prohibits employment or contracting with practitioners (or entities that employ or contract with such practitioners) that are excluded/sanctioned from participation * |

**TOTAL**

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CR 2: Credentialing Committee

The IPA designates a credentialing committee that uses a peer-review process to make recommendations regarding credentialing decisions. The IPA obtains meaningful advice and expertise from participating practitioners in making credentialing decisions.

<table>
<thead>
<tr>
<th>Element A: Credentialing Committee</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Uses participating practitioners to provide advice and expertise for credentialing decisions. Delegate will be reviewed for documented process and committee minutes for evidence that the requirements are met.</td>
<td>*</td>
</tr>
<tr>
<td>2 Reviews credentials for practitioners who do not meet established thresholds. The committee must give thoughtful consideration of the credentialing information. The committee’s discussion must be documented within its meeting minutes</td>
<td>*</td>
</tr>
<tr>
<td>3 Ensures that files it does not see that meet established criteria are reviewed and approved by a medical director or designated physician</td>
<td>*</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SCORING</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>The organization meets all 3 factors</td>
<td>The organization meets 2 factors</td>
<td>No scoring option</td>
<td>The organization meets 1 factor</td>
<td>The organization meets no factors</td>
<td></td>
</tr>
</tbody>
</table>

CR 3: Credentialing Verification

The IPA verifies credentialing information through primary sources, unless otherwise indicated. The IPA conducts timely verification of information to ensure that practitioners have the legal authority and relevant training and experience to provide quality care.

NOTE:
• CR 3 is gathered from Credentialing File Audit Tool. Information must be available for review at the time of the audit. Review 5% or 50 files, whichever is less, with a minimum of 10 credentialing files. Complete the Credentialing File Worksheet.
• The IPA may use oral, written, and Health Plan approved Internet website data to verify information. Oral and Internet website verification requires a note in the credentialing file that includes the date and is either signed or initialed by the IPA staff who verified each credential. It should also contain the name/title of the person providing the verification, if applicable.

Refer to the Credentialing/Recredentialing Elements and Policies and Procedures for complete details. All document location will be Credentialing Files. Only additional sources will be noted.
<table>
<thead>
<tr>
<th>Assessment of the following File Review Elements</th>
<th>Ratio</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1 Licensure</td>
<td>8 out of 8</td>
<td>100%</td>
</tr>
<tr>
<td>A.2 DEA or CDS</td>
<td>8 out of 8</td>
<td>100%</td>
</tr>
<tr>
<td>A.2 DEA or CDS (Medicare)</td>
<td>8 out of 8</td>
<td>100%</td>
</tr>
<tr>
<td>A.3 Education, training</td>
<td>8 out of 8</td>
<td>100%</td>
</tr>
<tr>
<td>A.4 Board Certification</td>
<td>8 out of 8</td>
<td>100%</td>
</tr>
<tr>
<td>A.5 Work History</td>
<td>8 out of 8</td>
<td>100%</td>
</tr>
<tr>
<td>A.6 Malpractice claim history</td>
<td>8 out of 8</td>
<td>100%</td>
</tr>
</tbody>
</table>

**Sanction Information**

| Sanction Activity by Medicare and Medicaid (CMS) | 8 out of 8 | 100% |
|--------------------------------------------------|------------|
| Sanction Activity by Medicare and Medicaid (CMS) | 8 out of 8 | 100% |
| Medi-Cal Suspended and Ineligible List (DHCS)     | 8 out of 8 | 100% |

**Credentialing Application**

| Reason for any inability to perform the essential functions of the position, with or without accommodation | 8 out of 8 | 100% |
|------------------------------------------------------------------------------------------------------|------------|
| Lack of present illegal drug use                                                                        | 8 out of 8 | 100% |
| History of loss of license and felony convictions                                                      | 8 out of 8 | 100% |
| History of loss or limitation of privileges or                                                          | 8 out of 8 | 100% |
| Current malpractice insurance coverage                                                                  | 8 out of 8 | 100% |
| Current and signed attestation confirming the correctness and completeness of the application          | 8 out of 8 | 100% |

**Sanction Information**

| Hospital Admitting Privileges (CMS/DMHC/DHCS) | 8 out of 8 | 100% |
|-----------------------------------------------|------------|
| Medicare Opt-Out Verification (CMS)            | 8 out of 8 | 100% |
CR 3: Credentialing Verification

<table>
<thead>
<tr>
<th>Element A: Verification of Credentials</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>The IPA verifies that the following are within the prescribed time limits:</td>
<td></td>
</tr>
<tr>
<td>1 A current and valid license to practice is present and within the prescribed time limits.</td>
<td>100%</td>
</tr>
<tr>
<td>2 A valid DEA or CDS certificate, if applicable</td>
<td>100%</td>
</tr>
<tr>
<td>3 Education and training</td>
<td>100%</td>
</tr>
<tr>
<td>4 Board certification</td>
<td>100%</td>
</tr>
<tr>
<td>5 Work history</td>
<td>100%</td>
</tr>
<tr>
<td>6 History of professional liability claims that resulted in settlements or judgments paid on behalf of the practitioner</td>
<td>100%</td>
</tr>
</tbody>
</table>

**SCORING**

<table>
<thead>
<tr>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
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</thead>
<tbody>
<tr>
<td>Met</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met</td>
</tr>
</tbody>
</table>

CR 3: Credentialing Verification

Element A: Verification of Credentials

The IPA verifies that the following are within the prescribed time limits:

<table>
<thead>
<tr>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>100%</td>
</tr>
</tbody>
</table>

A valid DEA or CDS certificate, if applicable Verified within 180 calendar days

**SCORING**

<table>
<thead>
<tr>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met</td>
</tr>
</tbody>
</table>
### CR 3: Credentialing Verification (continued)

#### Element B: Sanction Information

In a review of credentialing files, two factors are present and within 180 calendar day time limit. Scoring for this element is based on a review of a sample of credentialing files.

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>High (90-100%) on file review for both factors</td>
<td>High (90-100%) on file review for 1 factor and medium (60-89%) on file review for 1 factor</td>
<td>Medium (60-89%) on file review for both factors</td>
<td>High (90-100%) or medium (60-89%) on file review for 1 factor and low (0-59%) on file review for 1 factor</td>
<td>Low (0-59%) on file review for both factors</td>
<td></td>
</tr>
</tbody>
</table>

#### Element B: Sanction Information (OIG) CMS

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met</td>
<td></td>
</tr>
</tbody>
</table>

#### Element B: Sanction Information (Medi-Cal Suspended and Ineligible Report (DHCS))

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met</td>
<td></td>
</tr>
</tbody>
</table>

---

**SCORING**

Score

8 of 35
The application includes a current and signed attestation and addresses:

To count any elements as present, the practitioner must sign and date the application and any relevant addenda. It may not be older than 180 calendar days at the time of the credentialing decision. Receipt of the attestation is not required before the IPA conducts other credentialing verification and queries. If the attestation exceeds 180 calendar days and the IPA updates it, the practitioner must attest only that the information on the application remains correct and complete.

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>100%</td>
<td>80%</td>
<td>50%</td>
<td>20%</td>
<td>0%</td>
</tr>
</tbody>
</table>

### CR 3: Credentialing Verification (continued)
### Element D: Hospital Admitting Privileges - CMS/DHMC/DHCS

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>100%</td>
<td>80%</td>
<td>50%</td>
<td>20%</td>
<td>0%</td>
</tr>
</tbody>
</table>
CR 3: Credentialing Verification (continued)

<table>
<thead>
<tr>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>100%</td>
</tr>
</tbody>
</table>

CR R3: Recredentialing Verification

The IPA verifies recredentialing information through primary sources, unless otherwise indicated. The IPA conducts timely verification of information to ensure that practitioners have the legal authority and relevant training and experience to provide quality care.

NOTE:

• CR R3 through CR 4 is gathered from Recredentialing File Audit Tool. Information must be available for review at the time of the audit. Review 5% or 50 files, whichever is less, with a minimum of 10 recredentialing files. Complete the Recredentialing File Worksheet.

• The IPA may use oral, written, and Health Plan approved Internet website data to verify information. Oral and Internet website verification requires a note in the credentialing file that includes the date and is either signed or initialed by the IPA staff who verified each credential. It should also contain the name/title of the person providing the verification, if applicable.

Refer to the Credentialing/Recredentialing Elements and Policies and Procedures for complete details. All document location will be Credentialing Files. Only additional sources will be noted.
### File Review Results

#### Recredentialing File Review Results

<table>
<thead>
<tr>
<th>Assessment of the following File Review Elements</th>
<th>Ratio</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1 Licensure</td>
<td>8</td>
<td>100%</td>
</tr>
<tr>
<td>A.2 DEA or CDS</td>
<td>8</td>
<td>100%</td>
</tr>
<tr>
<td>A.2 DEA or CDS (Medicare)</td>
<td>8</td>
<td>100%</td>
</tr>
<tr>
<td>A.3 Board Certification (Score is combined with Education/Training)</td>
<td>8</td>
<td>0%</td>
</tr>
<tr>
<td>A.4 Malpractice claim history</td>
<td>8</td>
<td>100%</td>
</tr>
</tbody>
</table>

#### Sanction Information

| B.1 State sanctions, restrictions on licensure and/or limitations on scope of practice | 8     | 100%       |
| B.2 Sanction Activity by Medicare and Medicaid | 8     | 100%       |
| B.3 Sanction Activity by Medicare and Medicaid (CMS) | 8     | 100%       |
| B.4 Medi-Cal Suspended and Ineligible List (DHCS) | 8     | 100%       |

#### Recredentialing Application

| C.1 Reasons for any inability to perform the essential functions of the position, with or without accommodation | 8     | 100%       |
| C.2 Lack of present illegal drug use               | 8     | 100%       |
| C.3 History of loss of license and felony convictions | 8     | 100%       |
| C.4 History of loss or limitation of privileges or | 8     | 100%       |
| C.5 Current malpractice insurance coverage         | 8     | 100%       |
| C.6 Current and signed attestation confirming the correctness and completeness of the application | 8     | 100%       |
| D Hospital Privileges or Alternate Admitting Agreement, as applicable | 8     | 100%       |

#### Sanction Information

| D State sanctions, restrictions on licensure and/or limitations on scope of practice | 8     | 100%       |

#### Assessment of the following File Review Elements (CMS of DHCS)

| E Medicare Opt-Out Verification (CMS) | 8     | 100%       |
| F Review of Performance Information (CMS & DHCS) | 8     | 100%       |
CR R3: Credentialing Verification

Element A: Verification of Credentials

The IPA verifies that the following are within the prescribed time limits:

<table>
<thead>
<tr>
<th>Score</th>
<th>Element Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>100%</td>
<td>A current and valid license to practice</td>
</tr>
<tr>
<td>100%</td>
<td>A valid DEA or CDS Certificate, if applicable</td>
</tr>
<tr>
<td>100%</td>
<td>Board Certification, as applicable</td>
</tr>
<tr>
<td>100%</td>
<td>A history of professional liability claims that resulted in settlement or judgment paid on behalf of the practitioner</td>
</tr>
</tbody>
</table>

**SCORING**

<table>
<thead>
<tr>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>High (90-100%) on file review for all 4 factors</td>
<td>High (90-100%) on file review for 2-3 factors and medium (60-89%) on file review for the remaining 1 factor</td>
<td>High (90-100%) or medium (60-89%) on file review for 3 factors and low (0-59%) on 1 factor or medium (60-89%) on file review for all 4 factors</td>
<td>High (90-100%) or medium (60-89%) on file review for 2 factors and low (0-59%) on 2 factors</td>
<td>Low (0-59%) on file review for 3 or more factors</td>
</tr>
</tbody>
</table>

Element A: Verification of Credentials

The IPA verifies that the following are within the prescribed time limits:

<table>
<thead>
<tr>
<th>Score</th>
<th>Element Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>100%</td>
<td>A valid DEA or CDS certificate, if applicable</td>
</tr>
</tbody>
</table>

Medicare - Verification time limit - 180 days

**SCORING**

<table>
<thead>
<tr>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met (90-100%) on file review</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met (0-89%) file review</td>
</tr>
</tbody>
</table>
### CR R3: Credentialing Verification (continued)

#### Element B: Sanction Information

In a review of credentialing files, two factors are present and within 180 calendar day time limit. Scoring for this element is based on a review of a sample of credentialing files.

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>High (90-100%) on file review for both factors</td>
<td>0</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
</tr>
<tr>
<td>High (90-100%) on file review for 1 factor and medium (60-89%) on the file review for 1 factor</td>
<td>0</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
</tr>
<tr>
<td>Medium (60-89%) on file review for both factors</td>
<td>0</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
</tr>
<tr>
<td>High (90-100%) or medium (60-89%) on file review for 1 factor and low (0-59%) on file review for 1 factor</td>
<td>0</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
</tr>
<tr>
<td>Low (0-59%) on file review for both factors</td>
<td>0</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
</tr>
</tbody>
</table>

#### Element B: Sanction Information (OIG) CMS

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met (90-100%) on file review</td>
<td>0</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
</tr>
<tr>
<td>No scoring option</td>
<td>0</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
</tr>
<tr>
<td>No scoring option</td>
<td>0</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
</tr>
<tr>
<td>Not Met (0-89%) on file review</td>
<td>0</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
</tr>
</tbody>
</table>

#### Element B: Sanction Information (Medi-Cal Suspended and Ineligible Report) DHCS

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met (90-100%) on file review</td>
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<td>区内</td>
<td>区内</td>
<td>区内</td>
<td>区内</td>
</tr>
</tbody>
</table>
CR R3: Credentialing Verification (continued)

### Element C: Recredentialing Application

The application includes a current and signed attestation and addresses:

- To count any elements as present, the practitioner must sign and date the application and any relevant addenda. It may not be older than 180 calendar days at the time of the credentialing decision. Receipt of the attestation is not required before the IPA conducts other credentialing verification and queries. If the attestation exceeds 180 calendar days and the IPA updates it, the practitioner must attest only that the information on the application remains correct and complete.

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Reasons for any inability to perform the essential functions of the position, with or without accommodation</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Lack of present illegal drug use</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>History of loss of license and felony convictions</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| 4 | History of loss or limitation of privileges or disciplinary actions
   A history of all past and present issues regarding loss or limitations of clinical privileges at all facilities or organizations with which the practitioner has had privileges | 100% | | | |
| 5 | Current malpractice insurance coverage
   A copy of the insurance face sheet that includes the dates and amount of current malpractice coverage | 100% | | | |
| 6 | Current and signed attestation confirming the correctness and completeness of the application
   An attestation indicates that the applicant personally attests to the correctness and completeness of the application at the time he/she applied to the IPA. | 100% | | | |

**TOTAL** 6

### Element D: Hospital Admitting Privileges - CMS/DHMC/DHCS

- Practitioner must have clinical privileges in good standing. Physicians must indicate their current hospital affiliation or admitting privileges at participating hospitals.

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Practitioner must have clinical privileges in good standing. Physicians must indicate their current hospital affiliation or admitting privileges at participating hospitals.</td>
<td>100%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Delegate: 

Reviewed By: __________________________  Review Date: __________________________

________________________________________

15 of 35
The IPA includes information from quality improvement activities and member complaints in the recredentialing decision-making process for all practitioners. Performance indicators include:

### Element A: Recredentialing Cycle Length

- **Score**: 100%

<table>
<thead>
<tr>
<th>SCORING</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met (90-100%) on file review</td>
<td>100%</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met (0-89%) file review</td>
</tr>
</tbody>
</table>

### CR 4: Recredentialing Cycle Length

The IPA formally recredits its practitioners at least every 36 months through information verified from primary sources, unless otherwise indicated. The IPA identifies any changes that may have occurred since the last credentialing process that may affect the care provided to members.

### Element E: Sanction Information (Monitoring Physicians Who Have Opted Out) CMS

<table>
<thead>
<tr>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>100%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
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<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met (90-100%) on file review</td>
<td>100%</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met (0-89%) file review</td>
</tr>
</tbody>
</table>

### Element F: Review of Performance information - CMS/DHCS

<table>
<thead>
<tr>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>100%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SCORING</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Met (90-100%) on file review</td>
<td>100%</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met (0-89%) file review</td>
</tr>
</tbody>
</table>
CR 5: Practitioner Office Site Quality

The IPA has a process to assess the quality, safety and accessibility of the office sites where care is delivered.

### Element A: Performance Standards and Thresholds

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Physical Accessibility</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Physical Appearance</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Network Adequacy of waiting and examining room space</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Adequacy of medical/treatment record keeping</td>
<td>N/A</td>
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**TOTAL**

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<td>The organization meets 1 factor</td>
<td>The organization meets no factors</td>
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### Element B: Site Visits and Ongoing Monitoring

The organization implements appropriate interventions by:

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<thead>
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<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Continually monitoring member complaints for all practitioner sites</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Conducting site visits of offices within 60 calendar days of determining that the complaint threshold was met</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Instituting actions to improve offices that do not meet thresholds</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Evaluating the effectiveness of the actions at least every six months, until deficient offices meet the thresholds</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Documenting follow-up visits for offices that had subsequent deficiencies</td>
<td>N/A</td>
<td></td>
<td></td>
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</tbody>
</table>

**TOTAL**

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<th>50%</th>
<th>20%</th>
<th>0%</th>
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</thead>
<tbody>
<tr>
<td>N/A</td>
<td>The organization meets all 5 factors</td>
<td>The organization meets 3-4 factors</td>
<td>The organization meets 2 factors</td>
<td>The organization meets 1 factor</td>
<td>The organization meets no factors</td>
</tr>
</tbody>
</table>
**CR 6: Ongoing Monitoring**

The delegate develops and implements policies and procedures for ongoing monitoring of practitioner sanctions, complaints and quality issues between recredentialing cycles and takes appropriate action against practitioners when it identifies occurrences of poor quality. The IPA identifies and, when appropriate, acts on important quality and safety issues in a timely manner during the interval between formal credentialing.

**Element A: Ongoing Monitoring and Interventions**

The IPA implements ongoing monitoring and takes appropriate interventions by:

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SCORING</strong></td>
<td>The organization meets all 5 factors</td>
<td>The organization meets 4 factors</td>
<td>The organization meets 3 factors</td>
<td>The organization meets 2 factor</td>
<td>The organization meets 0-1 factor</td>
</tr>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

**CR 6: Ongoing Monitoring (Continued)**

**Element B: Monitoring Medicare Opt-Out Report - CMS**

<table>
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<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SCORING</strong></td>
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<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met</td>
</tr>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>
### CR 6: Ongoing Monitoring (Continued)

#### Element C: Monitoring Medi-Cal Suspended and Ineligible Provider Reports - DHCS

<table>
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<tr>
<th>Score</th>
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<th>50%</th>
<th>20%</th>
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<tbody>
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<td>No scoring option</td>
<td>Not Met</td>
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</table>

<table>
<thead>
<tr>
<th>CR 6: Ongoing Monitoring (Continued)</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CR 6: Ongoing Monitoring (Continued)</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Element C: Monitoring Medi-Cal Suspended and Ineligible Provider Reports - DHCS</strong></td>
<td></td>
</tr>
<tr>
<td>1 The IPA will verify that their contracted providers have not been terminated as a Medi-Cal providers or have not been placed on the Suspend and Ineligible Provider List</td>
<td>*</td>
</tr>
</tbody>
</table>

### CR 7: Notification to Authorities and Practitioner Appeal Rights

When an IPA has taken action against a practitioner for quality reasons, it offers the practitioner a formal appeal process and reports the action to the appropriate authorities. The IPA uses objective evidence and patient care considerations to decide on the means of altering a practitioner’s relationship with the IPA if that practitioner does not meet the IPA’s quality standards.

#### Element A: Actions Against Practitioners

The IPA has written policies and procedures for:

Policies and procedures state how the IPA reviews participation of practitioners whose conduct could adversely affect member’s health or welfare. Must at a minimum, meet the requirements of the Health Care Quality Improvement Act of 1986.

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Met</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met</td>
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<table>
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<tr>
<th>CR 7: Notification to Authorities and Practitioner Appeal Rights</th>
<th>Score</th>
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<tbody>
<tr>
<td><strong>CR 7: Notification to Authorities and Practitioner Appeal Rights</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Element A: Actions Against Practitioners</strong></td>
<td></td>
</tr>
<tr>
<td>1 The range of actions available to the IPA</td>
<td>*</td>
</tr>
<tr>
<td>2 Procedures for reporting to authorities</td>
<td>*</td>
</tr>
<tr>
<td>3 A well-defined appeal process</td>
<td>*</td>
</tr>
<tr>
<td>4 Making the appeal process known to practitioners</td>
<td>*</td>
</tr>
</tbody>
</table>

**TOTAL**
The organization meets all 4 factors

No scoring option

The organization meets 3 factors

No scoring option

The organization meets 0-2 factors

<table>
<thead>
<tr>
<th>0</th>
<th>The organization meets all 4 factors</th>
<th>No scoring option</th>
<th>The organization meets 3 factors</th>
<th>No scoring option</th>
<th>The organization meets 0-2 factors</th>
</tr>
</thead>
</table>

Delegate: ________________________________

Reviewed By: ____________________________  Review Date: _______________
**CR 7: Notification to Authorities and Practitioner Appeal Rights (continued)**

### Element B: Reporting to the Appropriate Authorities

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
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<td><img src="image2.png" alt="image" /></td>
<td><img src="image3.png" alt="image" /></td>
<td><img src="image4.png" alt="image" /></td>
<td><img src="image5.png" alt="image" /></td>
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<tr>
<td></td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>The organization reports actions to authorities, when appropriate</td>
<td>The organization does not report actions to authorities, when appropriate</td>
</tr>
</tbody>
</table>

### Element C: Practitioner Appeals Process

**Appeal process/actions to be taken:**
The IPA has an appeal process for instances in which it chooses to alter the conditions of a practitioner’s participation based on issues of quality of care and/or service. The IPA informs practitioners of the appeal process.

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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<tr>
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<td><img src="image9.png" alt="image" /></td>
<td><img src="image10.png" alt="image" /></td>
</tr>
<tr>
<td></td>
<td>Provide written notification indicating that a professional review action has been brought against the practitioner, reasons for the action and a summary of the appeal rights and process.</td>
<td>Allow practitioners to request a hearing and a specific time period for submitting request</td>
<td>Allow at least 30 days after notification for practitioner to request hearing</td>
<td>Allow practitioner to be represented by an attorney or another person of the practitioner’s choice</td>
<td>Appoint hearing officer or panel of individuals appointed by organization to review appeal</td>
</tr>
</tbody>
</table>

**TOTAL**

<table>
<thead>
<tr>
<th>SCORING</th>
<th>100%</th>
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<tr>
<td></td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>The organization meets all 6 factors</td>
<td>The organization meets 0-5 factors</td>
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</table>
CR 8: Assessment of Organizational Providers

The delegate has written policies and procedures for the initial and ongoing assessment of providers with which it contracts. The delegate has written policies and procedures for the initial and ongoing assessment of organizational providers with which it contracts. Providers include laboratories, home health agencies, outpatient rehabilitations and free-standing surgical centers. Also included are behavioral health facilities providing mental health or substance abuse services to inpatient, residential or ambulatory settings.

Element A: Review and Approval of Provider

The IPA’s policy for assessing health care delivery providers specifies that before it contracts with a provider, and for at least every three years thereafter, it

<table>
<thead>
<tr>
<th>Score</th>
<th>100%</th>
<th>80%</th>
<th>50%</th>
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</thead>
<tbody>
<tr>
<td>Met</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>Not Met</td>
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</table>

<table>
<thead>
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<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>The organization meets all 3 factors</td>
<td>The organization meets 2 factors</td>
<td>The organization meets 1 factor</td>
<td>No scoring option</td>
<td>No written policy exists</td>
</tr>
</tbody>
</table>

CR 8: Assessment of Organizational Providers (continued)

Element B: Medical Providers
Delegate: 

Reviewed By: ___________________________ Review Date: ___________________________

<table>
<thead>
<tr>
<th>Score</th>
<th>Hospitals</th>
<th>Home Health Agencies</th>
<th>Skilled Nursing Facilities</th>
<th>Free Standing Surgical Centers</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>*</td>
<td>*</td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>3</td>
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</tr>
<tr>
<td>4</td>
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**SCORING**

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<th>50%</th>
<th>20%</th>
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</tr>
</thead>
<tbody>
<tr>
<td>The organization meets all 4 factors</td>
<td>The organization meets 3 factors, including factor 1</td>
<td>The organization meets 3 factors, including factor 1</td>
<td>The organization meets 2 factor</td>
<td>No written policy exists</td>
</tr>
</tbody>
</table>

The IPA includes at least the following medical providers:
The IPA must have policies and procedures that specifically address the assessment of hospitals, home health agencies, skilled nursing facilities, nursing homes and free standing surgical centers with which it contracts, regardless of the number of members treated at the facilities.

The organization meets all 4 factors.

The organization meets 3 factors, including factor 1.

The organization meets 3 factors, including factor 1.

The organization meets 2 factor.

No written policy exists.
### CR 8: Assessment of Organizational Providers (continued)

#### Element B: Medical Providers - CMS

**CMS Providers and Suppliers**

The IPA includes at least the following medical providers:

The IPA must have policies and procedures that specifically address the assessment of hospitals, home health agencies, skilled nursing facilities, nursing homes and free standing surgical centers with which it contracts, regardless of the number of members treated at the facilities.

<table>
<thead>
<tr>
<th>Score</th>
<th>1 Hospitals</th>
<th>2 Home Health Agencies</th>
<th>3 Skilled Nursing Facilities</th>
<th>4 Free Standing Surgical Centers (includes stand-alone abortion clinics and multi-specialty outpatient surgical centers)</th>
<th>5 Hospices</th>
<th>6 Clinical Laboratories</th>
<th>7 Comprehensive Outpatient Rehabilitation Facilities</th>
<th>8 Outpatient Physical Therapy Providers</th>
<th>9 Speech Pathology Providers</th>
<th>10 End-Stage Renal Services Providers</th>
<th>11 Outpatient Diabetics Self-Management Training Providers</th>
<th>12 Portable X-Ray Suppliers</th>
<th>13 Rural Health Clinics</th>
<th>14 Federally Qualified Health Centers</th>
<th><strong>TOTAL</strong></th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td>Met</td>
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<td>No scoring option</td>
<td>No scoring option</td>
<td>Not met</td>
</tr>
</tbody>
</table>

### CR 8: Assessment of Organizational Providers (continued)

#### Element C: Behavioral Healthcare Providers

The IPA includes behavioral healthcare facilities providing mental health or substance abuse services in the following settings.

<table>
<thead>
<tr>
<th>Score</th>
<th>1 Inpatient</th>
<th>2 Residential</th>
<th>3 Ambulatory</th>
<th><strong>TOTAL</strong></th>
</tr>
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**SCORING**

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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>The organization meets all 3 factors</td>
<td>No scoring option</td>
<td>The organization meets 1-2 factors</td>
<td>No scoring option</td>
</tr>
<tr>
<td>------</td>
<td>---------------------------------</td>
<td>------------------</td>
<td>---------------------------------</td>
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</tbody>
</table>

Delegate: 

Reviewed By: __________________________

Review Date: __________________________
Delegate: 

Reviewed By: ___________________________  Review Date: ___________________________

### CR 8: Assessment of Organizational Providers (continued)

The IPA verifies credentialing information through primary sources, unless otherwise indicated. The IPA conducts timely verification of information to ensure that practitioners have the legal authority and relevant training and experience to provide quality care.

**NOTE:**
- CR 8 is gathered from HDO File Audit Tool. Information must be available for review at the time of the audit. Review 5% or 50 files, whichever is less, with a minimum of 10 credentialing files. Complete the Credentialing File Worksheet.
- The IPA may use oral, written, and Health Plan approved Internet website data to verify information. Oral and Internet website verification requires a note in the credentialing file that includes the date and is either signed or initialed by the IPA staff who verified each credential. It should also contain the name/title of the person providing the verification, if applicable.

Refer to the Credentialing/Recredentialing Elements and Policies and Procedures for complete details. All document location will be Credentialing Files. Only additional sources will be noted.

<table>
<thead>
<tr>
<th>File Review Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organizational Provider File Review Results</td>
</tr>
</tbody>
</table>

### Assessment of the following File Review Elements

<table>
<thead>
<tr>
<th>Element D: Review and Approval of Medical Providers</th>
<th>Ratio</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1 Confirms that the provider is in good standing with state and federal regulatory bodies</td>
<td>0 out of 0</td>
<td>#DIV/0!</td>
</tr>
<tr>
<td>A.2-3 Confirms that the provider has been reviewed and approved by an accrediting body or conducts an on-site quality assessment, if the provider is not accredited</td>
<td>0 out of 0</td>
<td>#DIV/0!</td>
</tr>
<tr>
<td>A.4 Reconfirms every three years</td>
<td>0 out of 0</td>
<td>#DIV/0!</td>
</tr>
</tbody>
</table>

### Element D: Assessment of Organizational Providers (CMS)

| A.1 The IPA’s policy for gathering the data for assessing Organizational Providers must meet the 180 calendar day time limit | #REF! out of #REF! #REF! |

26 of 35
Delegate: 

Reviewed By: 

Review Date: 

### Element D: Assessing Medical Providers

<table>
<thead>
<tr>
<th>Score</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The delegate has documentation of assessment of contracted medical health care providers. Review of the tracking mechanism that the IPA uses to ensure that it has met these</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SCORING</th>
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<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>No documentation is present of a completed assessment</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
</tr>
</tbody>
</table>

Documentation is present that the organization completed an assessment of contracted medical providers.
### File Review Results

#### Organizational Provider File Review Results

<table>
<thead>
<tr>
<th>Assessment of the following File Review Elements</th>
<th>Ratio</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Element D: Review and Approval for CMS Organizational Providers</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A.1 Confirms that the provider is in good standing with state and federal regulatory bodies</td>
<td>0 out of 0</td>
<td>#DIV/0!</td>
</tr>
<tr>
<td>A.2-3 Confirms that the provider has been reviewed and approved by an accrediting body or conducts an on-site quality assessment, if the provider is not accredited</td>
<td>0 out of 0</td>
<td>#DIV/0!</td>
</tr>
<tr>
<td>A.4 Reconfirms every three years</td>
<td>0 out of 0</td>
<td>#DIV/0!</td>
</tr>
</tbody>
</table>

#### Element D: Assessing Medical Providers (CMS)

<table>
<thead>
<tr>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 The delegate has documentation of assessment of contracted medical health care providers. Review of the tracking mechanism that the IPA uses to ensure that it has met these requirements</td>
</tr>
</tbody>
</table>

**SCORING**

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<thead>
<tr>
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<th>80%</th>
<th>50%</th>
<th>20%</th>
<th>0%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Documentation is present that the organization completed an assessment of contracted medical providers</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No scoring option</td>
<td>No documentation is present of a completed assessment</td>
</tr>
</tbody>
</table>

#### Element F: Accreditation/Certification of Free-Standing Surgical Centers in California - CH&SC

<table>
<thead>
<tr>
<th>Score</th>
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</thead>
<tbody>
<tr>
<td>1 The organization has documentation of assessment of free-standing surgical centers to ensure that if the organizational provider is not accredited by an agency accepted by the State of California, the provider is certified to participate in the Medicare Program, in compliance with California Health and Safety Code § 1248.1</td>
</tr>
</tbody>
</table>

**SCORING**

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<tr>
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</thead>
</table>
Delegate: ________________________________

Reviewed By: ____________________________  Review Date: ________________

<table>
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<tr>
<th>No</th>
<th>Documentation is present that the organization completed an assessment of free-standing surgical centers</th>
<th>No scoring option</th>
<th>No scoring option</th>
<th>No scoring option</th>
<th>No documentation is present of a completed assessment</th>
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</thead>
</table>
CR 9: Delegation of CR

If the delegate delegates any NCQA-required credentialing activities, there is evidence of oversight of the delegated activities. The delegate remains accountable for credentialing and recredentialing its practitioners, even if it delegates all or part of these activities. The IPA can utilize an NCQA accredited CVO only.

Element A: Written Delegation Agreement

The written delegation document:
- There must be a written description of all delegated credentialing for all delegated medical groups
- Is mutually agreed upon
- Describes the delegated activities and responsibilities of the organization and the delegated entity.
- Requires at least semi-annual reporting of the delegated entity to the organization
- Describes the process by which the IPA evaluates the delegated entity’s performance
- Specifies the organization retains the right to approve, suspend and terminate, individual practitioners, provider and sites, even if the organization delegates decision making
- Describes the remedies available to the IPA if the delegated entity does not fulfill its obligations, including revocation of the delegation agreement

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<td>The organization meets all 5 factors</td>
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<td>2</td>
<td>Describes the delegated activities and responsibilities of the organization and the delegated entity</td>
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<td>3</td>
<td>Requires at least semi-annual reporting of the delegated entity to the organization</td>
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<td>Describes the process by which the IPA evaluates the delegated entity’s performance</td>
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<td>5</td>
<td>Specifies the organization retains the right to approve, suspend and terminate, individual practitioners, provider and sites, even if the organization delegates decision making</td>
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<td>6</td>
<td>Describes the remedies available to the IPA if the delegated entity does not fulfill its obligations, including revocation of the delegation agreement</td>
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TOTAL

**SCORING**

- 0

**SCORING (CMS)**

- 0
CR 9: Delegation of CR (continued)

If the delegation arrangement includes the use of protected health information by the delegate, the delegation document also includes the following provisions:

When delegates have access to the IPA’s protected health information (PHI) on members or practitioners, or create such information in the course of their work, the mutually agreed upon document must ensure that the information will remain protected.

HIPAA regulations define a covered entity as a health plan, health care clearinghouse or health care provider that transmits any health information by electronic means in connection with an electronic health care transaction.

If the delegation agreement does not include the use of PHI in any form, an affirmative statement to that fact in the delegation agreement is sufficient, but is not required.

**Element B: Provision for Protected Health Information**

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<thead>
<tr>
<th>Score</th>
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<tbody>
<tr>
<td>*</td>
<td>A list of the allowed uses of protected health information</td>
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<tr>
<td>*</td>
<td>A description of delegate safeguards to protect the information from inappropriate use or further disclosure</td>
</tr>
<tr>
<td>*</td>
<td>A stipulation that the delegate will ensure that sub-delegates have similar safeguards</td>
</tr>
<tr>
<td>*</td>
<td>A stipulation that the delegate will provide individuals with access to their protected health information</td>
</tr>
<tr>
<td>*</td>
<td>A stipulation that the delegate will inform the IPA if inappropriate uses of the information occur</td>
</tr>
<tr>
<td>*</td>
<td>A stipulation that the delegate will ensure protected health information is returned, destroyed or protected if the delegation agreement ends</td>
</tr>
</tbody>
</table>

**SCORING**

- 100%: High (90-100%) on file for all 6 factors
- 80%: High (90-100%) on file review for 4 or 5 factor and medium (60-89%) on file review for remaining 1-2 factors
- 50%: High (90-100%) or medium (60-89%) on file review for 5 factors and low (0-59%) on no more than 1 factor
- 20%: High (90-100%) or medium (60-89%) on file review for 4 factor and low (0-59%) on no more than 2 factors
- 0%: Low (0-59%) on file review for 3 or more factors

**CR 9: Delegation of CR (continued)**

**Element C: Pre-Delegation Evaluation**

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<tr>
<td>*</td>
<td>For new delegation agreements initiated in the look-back period, the IPA evaluated delegate capacity to meet NCQA requirements before delegation began</td>
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Delegate: 

Reviewed By: 

Review Date: 

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The organization has evaluated delegate capacity before the delegation process was signed

No scoring option

The organization evaluated delegate capacity after the delegation document was signed

No scoring option

The organization did not evaluate delegate capacity

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Delegate: 

Reviewed By: 

Review Date: 

CR 9: Delegation of CR (continued)

Element D: Review of Credentialing Process

For delegation arrangements in effect for 12 months or longer, the IPA:

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CR 9: Delegation of CR (continued)

Element E: Opportunities for Improvement

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For delegation arrangements that have been in effect for more than 12 months, at least once in the past year that delegation has been in effect, the IPA has identified and followed up on opportunities for improvement, if applicable.

CR 10: Identification of HIV/AIDS Specialists

The organization has documents and implements a method for identifying HIV/AIDS Specialists.

Element A: Written Process

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The IPA has a written policy and procedure describing the process that the organization identifies or reconfirms the appropriately qualified physicians who meet the definition of an HIV/AIDS specialist according to California State regulations on an annual basis.
### CR 10: Identification of HIV/AIDS Specialists (continued)

#### Element B: Evidence of Implementation

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- **There is evidence that annual screening has occurred**
- **No scoring option**
- **No scoring option**
- **No scoring option**
- **No screening has occurred**

### CR 10: Identification of HIV/AIDS Specialists (continued)

#### Element C: Distribution of Findings

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</table>

- **List is available to the surveyor and has been given to the appropriate department**
- **No scoring option**
- **List is available, but has not been given to the appropriate department**
- **No scoring option**
- **No list**
<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>IEHP Responsibilities</th>
<th>Delegate Responsibilities</th>
<th>Frequency of Reporting</th>
<th>Process for Evaluating Delegates Performance</th>
<th>Corrective Actions if Delegate Fails to Meet Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fraud, Waste and Abuse</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA has a process in place to notify IEHP of suspected fraudulent behavior, and cooperating with IEHP in the investigation to the extent permitted by law.</td>
<td>Initial Onsite Assessment, Annual DOA</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_13B.</td>
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<tr>
<td>(42 CFR 423.504, Part D Manual Ch. 9, CMS MA Manual Ch. 11 Section 20)</td>
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<tr>
<td>HIPAA/Title 45 CFR; HITECH Act ARRA COMIA</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA maintains policies and procedures required by HIPAA and ARRA.</td>
<td>Initial Onsite Assessment, Annual DOA</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_13B.</td>
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<tr>
<td></td>
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<td>- Uses and disclosures of PHI</td>
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<td>- Member access to PHI and amendment/restriction process</td>
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<td>- (CMS) Auditing/Monitoring of Business Associates, First Tier, Downstream and Related Entities</td>
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<td>- Security of Facilities and Information Systems</td>
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<td>- Record Retention</td>
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<td>- Non-retaliation for exercising rights provided by the Privacy Rule.</td>
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<td>- Reporting incidents of HIPAA non-compliance to IEHP</td>
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<td>A privacy officer has been designated by the IPA.</td>
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<td>There are appropriate administrative, technical and physical safeguards to prevent intentional or unintentional use or disclosure of PHI.</td>
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## Delegated IPA Denial Log Review Tool

### Medicare

**Delegated IPA Denial Log Review Tool**

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<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) Member Written Notification</th>
<th>(n) Physician Written Notification</th>
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**Data Dictionary**

- **a** Denial Tracking Number: The number located on the referral form for tracking purposes.
- **b** File Type Requested: Pre-Service Routine, Pre-Service Expedited, Post Service Retrospective Review.
- **c** Referral Request Date: Date the referral was sent to Delegate for review.
- **d** Referral Received Date: Date the referral was received by the Delegate for a decision.
- **e** Decision Date: Date the decision was made by the Delegate to Approve, Modify or Deny the case.
- **f** Written Physician Notification Date: Date of the physician written notification.
- **g** Physician Availability to Discuss: Physician will be available to discuss determinations based on medical appropriateness.
- **h** Decision Timeliness: Delegates decision to approve, modify, deny a referral request in a timely manner according to regulations.
- **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.
- **j** Physician Reviewed: Physician reviewed all denial for medical necessity.
- **k** Clinical Information: Medical information supporting the request.
- **l** Alternative Direction: The Member is given alternative direction for follow-up care.
- **m** Member Written Notification: Written Notification to the Member of the requested referral decision.
- **n** Physician Written Notification: Written Notification to the physician of the requested referral decision by the Delegate.

**Policy and/or Regulation**

- **CMS UM Timeliness, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA_25E1 Procedures - Authorization and Notification for Referrals and Services**
- **CMS UM Timeliness, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA_25E1 Procedures - Authorization and Notification for Referrals and Services**
- **CMS UM Timeliness, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA_25E1 Procedures - Authorization and Notification for Referrals and Services**
- **CMS UM Timeliness, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA_25E1 Procedures - Authorization and Notification for Referrals and Services**
- **CMS UM Timeliness, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA_25E1 Procedures - Authorization and Notification for Referrals and Services**
- **CMS UM Timeliness, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA_25E1 Procedures - Authorization and Notification for Referrals and Services**
- **CMS UM Timeliness, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA_25E1 Procedures - Authorization and Notification for Referrals and Services**
- **CMS UM Timelines, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA_25E1 Procedures - Authorization and Notification for Referrals and Services**
- **CMS UM Timelines, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA_25E1 Procedures - Authorization and Notification for Referrals and Services**
- **CMS UM Timeliness, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA_25E1 Policies - Medicare DualChoice**

**Total Score:** 0 / 360

**Selected Individual Scores:**

| 0% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 0% | 0% |

**Comments:**

- 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.

**Instructions:**}

- **IEHP random selection 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.
| o | Member Language | The denial letter reason is clear & concise. | CMS, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA, 2018 Procedures - Denial Letters |
| p | Practitioner Language | The denial letter reason is clear & concise. | CMS, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA, 2018 Procedures - Denial Letters |
| q | Appropriate use of Criteria | The correct criteria hierarchy utilized for denied services | CMS, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA, 2018 Procedures - Denial Letters |
| r | Correct Template | Use of IEHP issued CMS Template | CMS, IEHP Provider Policy and Procedure Medicare DualChoice 01/20 MA, 2018 Procedures - Denial Letters |
| s | Points Earned | Total points earned from letters (g)–(r) above. | N/A |
| t | Points Possible | Total points possible from letters (g)–(r) above, excluding non-applicable elements. | N/A |
| u | Individual Score | Total points earned from letters (g)–(r) above divided by total points possible from letters (g)–(r) above, excluding non-applicable elements for each file. | N/A |
| v | Decision Timeliness CAP | 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. | N/A |
| w | Member Language CAP | 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. | N/A |
| x | Appropriate use of Criteria CAP | 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. | N/A |
| y | Correct Template CAP | 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. | N/A |
Listed below are the items required for your Delegation Oversight Audit (DOA). We have identified when they should be available, by Department. All Desktop documents are due by the date specified in the Delegation Oversight Letter.

<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>DELEGATION OVERSIGHT</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td></td>
<td>Biographical Information</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Sub-Contracted Service by Facility/Agency</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>All sections of the DOA tool documented with road mapping instructions for each element (see sample roadmap)</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Organizational chart(s)</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Current job descriptions as relevant to the audit</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Delegation Agreements with any sub-delegated provider</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Ownership and Control Documentation (submitted annually)</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>QUALITY MANAGEMENT (Look back period of 07/2019 to 06/2020)</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td></td>
<td>Quality Improvement Committee meeting minutes from the auditing period that identify the following occurred during the meeting</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>- Recommendation of policy decisions</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>- Review and evaluation of QI activities</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>- Practitioner participation in the QI program through planning, design, implementation or review</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>- Identification and follow up of needed actions</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Notification of Termination policy and evidence that members were notified of practitioner termination</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Continued Access to Practitioners policy and evidence that the delegate followed policy requirements</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Supportive documentation or materials such as studies, audits, and surveys completed during the reporting period</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>UTILIZATION MANAGEMENT (Look back period of 07/2019 to 06/2020)</th>
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</thead>
<tbody>
<tr>
<td>✓</td>
<td></td>
<td>Program, Plan and Description</td>
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<tr>
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<td></td>
<td>Annual Work Plan</td>
</tr>
<tr>
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<td>Annual Program Evaluation</td>
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</table>
Inland Empire Health Plan  
**Delegation Oversight Audit Tool 2020**  
**Audit Preparation Instructions - Medicare**

### UTILIZATION MANAGEMENT (Look back period of 07/2019 to 06/2020)

<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Policies and Procedures</th>
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<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Committee meeting minutes from last twelve (12) months for:</th>
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</thead>
<tbody>
<tr>
<td>✓</td>
<td></td>
<td>- Board of Directors</td>
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<tr>
<td>✓</td>
<td></td>
<td>- Utilization Management Committee</td>
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<table>
<thead>
<tr>
<th>DESKTOP</th>
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<th>Subcommittee Meeting Minutes</th>
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<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Annual Inter-rater Reliability Audit (On-Site Review)</th>
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<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Semi-Annual Health Plan Reports for the last twelve (12) months;</th>
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<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Two (2) examples that demonstrate the use of Board Certified consultants to assist with determinations</th>
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<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Criteria for Length of Stay and Medical Necessity used during the past two (2) years</th>
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<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Fifteen (15) referral files to include Denials, Modifications, Cancellations and Approvals; (conducted via webinar)</th>
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<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Referral Universe;</th>
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<tr>
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<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Utilization Management statistics from the last twelve (12) months;</th>
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<tbody>
<tr>
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<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Evidence that the Affirmative Statement has been distributed to providers and employees who make UM decisions;</th>
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<tbody>
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<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Evidence, other than via a denial letter, that the providers have been notified that they may contact a physician reviewer to discuss denial decisions;</th>
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<tbody>
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<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Provider communications from last twelve (12) months</th>
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<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Evidence of current license for Providers (MD/DO) and Employees (RN, LVN) who make UM Decisions</th>
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<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Copies of most recent referral inventory reporting used to manage turnaround time requirements for processing of IEHP referrals.</th>
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<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>Copies of most recent mailroom policies</th>
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### CARE MANAGEMENT (Look back period of 07/2019 to 06/2020)

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<tr>
<th>DESKTOP</th>
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<th>Program Plan and Description and CM applicable policies and procedures if different from UM; *(Desk Review) *</th>
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<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>(5) CM files; <em>(Conducted via webinar)</em></th>
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<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>*(5) sample cases of Carve Out/ Waiver Programs/ Termination of PCP/ SPC member letters <em>(conducted via webinar)</em></th>
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</table>
### Inland Empire Health Plan
**Delegation Oversight Audit Tool 2020**
*Audit Preparation Instructions - Medicare*

**DESKTOP**
**ON-SITE**
**CARE MANAGEMENT (Look back period of 07/2019 to 06/2020)**

- √
  - Documentation of coordination of care with county mental health clinics for Member receiving specialty mental health services.

**DESKTOP**
**ON-SITE**
**CREDENTIALING (Look back period of 07/2019 to 06/2020)**

- √ √
  - Credentialing Policies and Procedures

- √
  - Credentialing meeting minutes including date and voting attendees from the look back period, which may include, but not limited to, references from:
    - Quality Management Committee Minutes
    - Credentialing Committee Minutes
    - Peer Review Committee Minutes

- √
  - Delegate must submit a spreadsheet of all credentialed and recredentialed providers for the specified time period (Applicable to Kaiser, Delta Dental & ASH Specialty Network)

- √
  - (30) Credentialing files selected by the IEHP auditor will be provided and requested to be available in the order they are listed

- √
  - (30) Recredentialing files selected by the IEHP auditor will be provided and requested to be available in the order they are listed

- √
  - Evidence of Ongoing Monitoring of Sanctions

- √
  - Practitioner files of those providers terminated for Quality Issues

- √
  - Practitioner files that have appealed a decision

- √ √
  - Delegate must submit a spreadsheet of all organizational providers. IEHP will select credentialing and recredentialing files and the delegate may provide their spreadsheet tracking mechanism or file for the file audit

- √ √
  - Delegation Agreements with any sub-delegated provider

- √
  - HIV/AIDS Annual Survey

**DESKTOP**
**ON-SITE**
**COMPLIANCE (Look back period of 07/2019 to 06/2020)**

- √
  - Compliance policies and procedures

- √
  - Fraud, Waste and Abuse policies and procedures

- √
  - HIPAA Privacy and Security policies and procedures
| √ | Data Integrity Controls and Access Safeguards policies and procedures |
| √ | Standards of Conduct |
| √ | Delegation Oversight Annual Audit Compliance Program Attestation Form |
| √ | The name of the medical management system(s) used for the utilization management, care management, and claims functions. |
| √ | The participation of an appropriate systems administrator / IT representative that configures user access to the medical management systems(s) used for the utilization management, care management, and claims functions. *May be conducted via WebEx.* |
| √ | A walkthrough of the medical management system(s) to validate data integrity controls and access safeguards. *May be conducted via WebEx.* |
| √ | Employee Universe: Submit a list of all current employees who have performed job duties related to IEHP's lines of business. The definition of employees includes full and part time employees as well as temporary employees, interns, or volunteers. Members of the Governing Body should also be included. Refer to tab A. *Employee Universe* of the Compliance tool for required template. |
| √ | Reported Issues Universe: Submit a list of reported suspected Compliance and/or Fraud, waste, and abuse (FWA) issues impacting IEHP lines of business. Include reports such as but not limited to, hotline reports, walk-ins, on-line reports, self-disclosures to regulators, and/or investigation outcomes. Include incidents that were received and/or closed during the audit period. Refer to tab B. *Reported Issues Universe* of the Compliance tool for required template. **Do not include privacy and security incidents as those have been requested in a different universe.** |
| √ | Privacy & Security Incident Universe: Submit a list of reported suspected privacy & security incidents impacting IEHP lines of business. Include reports such as but not limited to, hotline reports, walk-ins, on-line reports, incidents reported to regulators, and/or investigation outcomes. Include incidents that were received and/or closed during the audit period. Refer to tab C. *Privacy & Security Incident Universe* of the Compliance tool for required template. |
| √ | Audit & Monitoring Universe: Create a list of all audits and monitoring activities completed during the audit period. Refer to |
### Inland Empire Health Plan

**Delegation Oversight Audit Tool 2020**

**Audit Preparation Instructions - Medicare**

<table>
<thead>
<tr>
<th></th>
<th>tab <em>D. Universe Audits &amp; Monitoring</em> of the Compliance tool for required template.</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td>User Types Universe: Submit a universe of user types/profiles for the medical management system(s) and claim management system(s). Include descriptions of user types and their applied permissions. Refer to tab <em>E. Universe_User Types</em> of the Compliance tool for required template.</td>
</tr>
<tr>
<td>✓</td>
<td>Active Users Universe: Submit a universe of all active users within the medical management(s) and the claims management system(s). Refer to tab <em>F. Universe_Active Users</em> of the Compliance tool for required template.</td>
</tr>
<tr>
<td></td>
<td>A sample* of 10 employees will be selected from the Employee Universe by the IEHP Auditor for which evidence of the following will be requested:</td>
</tr>
<tr>
<td></td>
<td>a. New Hire Screening of List of Excluded Individuals and Entities (LEIE), System for Award Management (SAM), and Medi-Cal Suspended &amp; Ineligible List (S&amp;I)</td>
</tr>
<tr>
<td></td>
<td>b. Monthly Screening performed of LEIE, SAM, and Medi-Cal S&amp;I for a sample of three consecutive months.</td>
</tr>
<tr>
<td></td>
<td>c. New hire confidentiality statement upon hire or start</td>
</tr>
<tr>
<td></td>
<td>d. Annual confidentiality statement</td>
</tr>
<tr>
<td></td>
<td>e. New hire Privacy &amp; Security training upon hire or start</td>
</tr>
<tr>
<td></td>
<td>f. Annual Privacy &amp; Security training</td>
</tr>
<tr>
<td>✓</td>
<td>A sample* of 5 audits and/or monitoring activities will be selected from the Audit and Monitoring Universe. Evidence of the following will be required:</td>
</tr>
<tr>
<td></td>
<td>a. Findings Reports</td>
</tr>
<tr>
<td></td>
<td>b. Findings were reported to an oversight body, senior leadership, and the board of directors</td>
</tr>
<tr>
<td></td>
<td>c. Corrective actions</td>
</tr>
<tr>
<td>✓</td>
<td>A sample* of 5 FWA investigations will be selected from the Reported Issues Universe. Evidence of the following will be required:</td>
</tr>
<tr>
<td></td>
<td>a. Suspected FWA was promptly investigated</td>
</tr>
</tbody>
</table>
Inland Empire Health Plan  
Delegation Oversight Audit Tool 2020  
Audit Preparation Instructions - Medicare

<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>PROVIDER DIRECTORY</th>
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<td>✓</td>
<td></td>
<td>Report during the lookback period of the annual audit of identified/reported inaccuracies and the timeframe of the correction. (Applies to Kaiser Permanente, Delta Dental, and American Specialty Health (ASH))</td>
</tr>
</tbody>
</table>

b. Suspected FWA was reported to IEHP with 10 days of becoming aware

A sample* of 5 privacy and security investigations will be selected from the Privacy and Security Incidents Universe. Evidence of the following will be required:

- a. Date incident was reported to the Privacy/Compliance Office/Officer
- b. Notification was sent to IEHP with 24 hours of discovery of a breach

* Scoring for this sample will apply for the 2020 audit cycle.
### CA21 - The number of critical incident and abuse reports for Members receiving LTSS

<table>
<thead>
<tr>
<th>Element Letter</th>
<th>Element Name</th>
<th>Definition</th>
<th>Allowable Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Total number of members receiving IHSS</td>
<td>Total number of members receiving IHSS services during the reporting period</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>B</td>
<td>Total number of members receiving CBAS</td>
<td>Total number of members receiving CBAS services during the reporting period</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>C</td>
<td>Total number of members receiving MSSP services</td>
<td>Total number of members receiving MSSP services during the reporting period</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>D</td>
<td>Total number of members receiving nursing facility (NF) services</td>
<td>Total number of members receiving NF services during the reporting period</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>E</td>
<td>Total number of critical incident and abuse reports among members receiving IHSS services</td>
<td>Of the total reported in A, the number of critical incident and abuse reports during the reporting period</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>F</td>
<td>Total number of critical incident and abuse reports among members receiving CBAS services</td>
<td>Of the total reported in B, the number of critical incident and abuse reports during the reporting period</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>G</td>
<td>Total number of critical incident and abuse reports among members receiving MSSP services</td>
<td>Of the total reported in C, the number of critical incident and abuse reports during the reporting period</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>H</td>
<td>Total number of critical incident and abuse reports among members receiving NF services</td>
<td>Of the total reported in D, the number of critical incident and abuse reports during the reporting period</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td></td>
<td>Date of Occurrence</td>
<td>Date of the critical incident</td>
<td>Date Report was Filed</td>
</tr>
<tr>
<td>---</td>
<td>------------------</td>
<td>-------------------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>I</td>
<td>Date of Occurrence</td>
<td>Date of the critical incident</td>
<td>Field Type: Date (YYYY/MM/DD)</td>
</tr>
<tr>
<td>J</td>
<td>Report Type</td>
<td>Type of Reporting</td>
<td>Field Type: Text (Domestic Violence, Suspected Child Abuse/Neglect, Suspected Elder/Dependent Abuse/Neglect)</td>
</tr>
<tr>
<td>K</td>
<td>Date Report was Filed</td>
<td>Date the critical incident was filed/reported</td>
<td>Field Type: Date (YYYY/MM/DD)</td>
</tr>
<tr>
<td>L</td>
<td>Report Reference Number</td>
<td>Critical incident report reference number</td>
<td>Field Type: Numeric</td>
</tr>
<tr>
<td>M</td>
<td>County</td>
<td>County critical incident reported</td>
<td>Field Type: Text (Riverside County, San Bernardino County, Other)</td>
</tr>
<tr>
<td>N</td>
<td>First Name of Contact at the Agency</td>
<td>First name of the contact at the agency</td>
<td>Field Type: Text</td>
</tr>
<tr>
<td>O</td>
<td>Last Name of Contact at the Agency</td>
<td>Last name of the contact at the agency</td>
<td>Field Type: Text</td>
</tr>
<tr>
<td>P</td>
<td>Contact Phone Number</td>
<td>Phone number of the contact at the agency</td>
<td>Field Type: Numeric (XXX-XXX-XXXX) &amp; extension if applicable</td>
</tr>
<tr>
<td>Q</td>
<td>Brief Description of Reported Incident</td>
<td>Brief description of the reported incident</td>
<td>Field Type: Text</td>
</tr>
</tbody>
</table>

2017 MMP California-Specific Reporting Requirements, Version, April 2019
### IEHP Universe Expedited Service Authorization Request (MESAR) Data Dictionary

<table>
<thead>
<tr>
<th>Column ID</th>
<th>Field Name</th>
<th>Field Type</th>
<th>Field Length</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Member First Name</td>
<td>CHAR</td>
<td>50</td>
<td>First name of the member</td>
</tr>
<tr>
<td>B</td>
<td>Member Last Name</td>
<td>CHAR</td>
<td>50</td>
<td>Last name of the member</td>
</tr>
<tr>
<td>C</td>
<td>Cardholder ID</td>
<td>CHAR</td>
<td>20</td>
<td>Cardholder identifier used to identify the beneficiary. This is assigned by the MMP. Note: IEHP 14 digit ID Number.</td>
</tr>
<tr>
<td>D</td>
<td>Contract ID</td>
<td>CHAR</td>
<td>5</td>
<td>The contract number of the organization. Note: <strong>H5355</strong> identifies the CMC line of business.</td>
</tr>
<tr>
<td>E</td>
<td>Plan ID</td>
<td>CHAR</td>
<td>3</td>
<td>The associated authorization number assigned by the MMP for this request. If an authorization number is not available, please provide your internal tracking or case number. Answer <strong>NA</strong> if there is no authorization or other tracking number available.</td>
</tr>
<tr>
<td>F</td>
<td>Authorization or Claim Number</td>
<td>CHAR</td>
<td>40</td>
<td>Indicate whether the service authorization request was made by a contract provider (CP), non-contract provider (NCP), member (M) or member's representative (MR). Note: The term &quot;provider&quot; encompasses physicians and facilities.</td>
</tr>
<tr>
<td>G</td>
<td>Who made the request</td>
<td>CHAR</td>
<td>2</td>
<td>Indicate whether the provider performing the service is a contract provider (CP) or non-contract provider (NCP).</td>
</tr>
<tr>
<td>H</td>
<td>Provider Type</td>
<td>CHAR</td>
<td>3</td>
<td>Provide the date the request was received by your organization. Submit in <strong>CCYY/MM/DD</strong> format (e.g., 2017/01/01). Note: If the request was received as a standard service authorization request, but later expedited, enter the date of the request to expedite the service authorization request.</td>
</tr>
<tr>
<td>I</td>
<td>Date the request was received</td>
<td>CHAR</td>
<td>10</td>
<td>Provide the time the request was received by your organization. Submit in <strong>HH:MM:SS</strong> military time format (e.g., 23:59:59). Note: This is the original receipt of the request by the MMP or delegated entity and not the date that the request became valid via an AOR. Also- if the request was received as a standard service authorization request, but later expedited, enter the time of the request to expedite the service authorization.</td>
</tr>
<tr>
<td>J</td>
<td>Time the request was received</td>
<td>CHAR</td>
<td>8</td>
<td>Provide the member diagnosis/diagnoses ICD-9/ICD-10 codes related to this request. If the ICD codes are unavailable, provide a description of the diagnosis, or for drugs provide the 11-digit National Drug Code (NDC) as well as the ICD-10 code related to the request.</td>
</tr>
</tbody>
</table>

**Note:**
- **A** - Member First Name
- **B** - Member Last Name
- **C** - Cardholder ID
- **D** - Contract ID
- **E** - Plan ID
- **F** - Authorization or Claim Number
- **G** - Who made the request
- **H** - Provider Type
- **I** - Date the request was received
- **J** - Time the request was received
- **K** - Diagnosis

**Additional Notes:**
- **NA** indicates no authorization or other tracking number available.
- **MMP** refers to the Member Management Program.
- **ICD-9** and **ICD-10** are International Classification of Diseases codes used for medical diagnosis and sickness and injury data in the United States.
- **NDC** (National Drug Code) is a unique 11-digit code assigned to each drug product in the United States.

**Examples:**
- Cardholder ID: **H5355**
- Contract ID: **001**
- Provider Type: Contract Provider (CP)
- Date the request was received: **2017/01/01**
- Time the request was received: **23:59:59**
- Diagnosis: Enter diagnosis codes related to the member's health condition.
<table>
<thead>
<tr>
<th>Column ID</th>
<th>Field Name</th>
<th>Field Type</th>
<th>Field Length</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>L</td>
<td>Type of service</td>
<td>CHAR Always Required</td>
<td>50</td>
<td>Enter &quot;BH&quot; for Behavioral Health services, &quot;LTSS&quot; for Long Term Services and Supports, 'SU' for Substance Use services. Other service / benefit types might include, but are not limited to DME, SNF care, dental, vision, etc.</td>
</tr>
<tr>
<td>M</td>
<td>Issue Description</td>
<td>CHAR Always Required</td>
<td>2,000</td>
<td>Provide a description of the service, medical supply or drug requested and why it was requested (if known). For denials, also provide an explanation of why the service request was denied.</td>
</tr>
<tr>
<td>N</td>
<td>Level of Service</td>
<td>CHAR Always Requested</td>
<td>50</td>
<td>Provide the level of service requested (e.g., inpatient / outpatient / ER / post stabilization care / urgent care / point of sale transaction / home healthcare).</td>
</tr>
<tr>
<td>O</td>
<td></td>
<td></td>
<td></td>
<td>Does not apply to California and so is not on the template. Applies to New York only.</td>
</tr>
<tr>
<td>P</td>
<td>Identify whether the request involves any of the following scenarios: 1) authorization for treatment regimen already in place, 2) retrospective authorization (service already provided), or 3) Routine authorizations (requests for specialty service, cost control purposes, out-of-network not otherwise exempt from prior authorization)</td>
<td>CHAR Always Required</td>
<td>50</td>
<td>For California MMPs- identify whether any of the following scenarios applies to the service request: 1) authorization for treatment regimen already in place, 2) retrospective authorization (service already provided), or 3) Routine authorizations (requests for specialty service, cost control purposes, out-of-network not otherwise exempt from prior authorization). CA MMPs should enter &quot;NA&quot; if none of the above categories apply, and all other MMPs may enter &quot;NA&quot; for this column.</td>
</tr>
<tr>
<td>Q</td>
<td>Subsequent Expedited Request</td>
<td>CHAR Always Required</td>
<td>3</td>
<td>If a request to expedite the service authorization request was made after the request was received, indicate who made the subsequent request to expedite the request: contract provider (CP), non-contract provider (NCP), member (M), member’s representative (MR) or MMP/ sponsor (S). Answer NA if no subsequent expedited timeframe was requested.</td>
</tr>
<tr>
<td>R</td>
<td>Was a timeframe extension taken?</td>
<td>CHAR Always Required</td>
<td>2</td>
<td>Yes (Y) / No (N) / Not Applicable (NA) indicator of whether the MMP extended the timeframe to make the service authorization decision.</td>
</tr>
<tr>
<td>Column ID</td>
<td>Field Name</td>
<td>Field Type</td>
<td>Field Length</td>
<td>Description</td>
</tr>
<tr>
<td>-----------</td>
<td>------------------------------------------------</td>
<td>-----------------------</td>
<td>--------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>S</td>
<td>If an extension was taken, did the MMP notify the member of the reason(s) for the delay and of their right to file an expedited grievance?</td>
<td>CHAR Always Required</td>
<td>2</td>
<td>Yes (Y) / No (N) indicator of whether the MMP notified the member of the delay. Answer NA if no extension was taken.</td>
</tr>
<tr>
<td>T</td>
<td>Request Disposition</td>
<td>CHAR Always Required</td>
<td>8</td>
<td>Status of the request. Valid values are: Approved or Denied. MMPs should note any requests that are untimely and not yet resolved (still outstanding) as denied. All untimely and pending cases should be treated as denials for the purposes of populating the rest of this record layout’s fields.</td>
</tr>
<tr>
<td>U</td>
<td>Date of MMP decision</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date of the MMP decision. Submit in CCYY/MM/DD format (e.g., 2017/01/01). MMPs should answer NA for untimely cases that are still open. Note: This is separate from effectuation, notice, etc. This is the determination to approve/deny and may not be a captured field but rather a field to be populated from notes.</td>
</tr>
<tr>
<td>V</td>
<td>Time of MMP Decision</td>
<td>CHAR Always Required</td>
<td>8</td>
<td>Time of the MMP decision (e.g., approved, denied). Submit in HH:MM:SS military time format (e.g., 23:59:59). MMPs should answer NA for untimely cases that are still open. Note: This is separate from effectuation, notice, etc. This is the determination to approve/deny and may not be a captured field but rather a field to be populated from notes.</td>
</tr>
<tr>
<td>W</td>
<td>Was the request denied for lack of medical necessity?</td>
<td>CHAR Always Required</td>
<td>2</td>
<td>Yes (Y) / No (N) indicator of whether the request was denied for lack of medical necessity. Answer NA if the request was approved. Answer No if the request was denied because it was untimely.</td>
</tr>
<tr>
<td>X</td>
<td>If denied for lack of medical necessity, was the review completed by a physician or other appropriate health care professional?</td>
<td>CHAR Always Required</td>
<td>2</td>
<td>Yes (Y) / No (N) indicator of review by a physician or other appropriate health care professional if request was denied for lack of medical necessity. Answer NA if the request was approved or not denied due to lack of medical necessity.</td>
</tr>
<tr>
<td>Y</td>
<td>Date oral notification provided to member</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date oral notification provided to member. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer NA if no oral notification. If good faith effort was made to contact the member, CMS recommends including the last good faith effort made within the notification timeframe.</td>
</tr>
<tr>
<td>Column ID</td>
<td>Field Name</td>
<td>Field Type</td>
<td>Field Length</td>
<td>Description</td>
</tr>
<tr>
<td>-----------</td>
<td>------------</td>
<td>------------</td>
<td>--------------</td>
<td>-------------</td>
</tr>
<tr>
<td>Z</td>
<td>Time oral notification provided to member</td>
<td>CHAR Always Required</td>
<td>8</td>
<td>Time oral notification provided to member. Submit in <strong>HH:MM:SS</strong> military time format (e.g., 23:59:59). Answer <strong>NA</strong> if no oral notification. If good faith effort was made to contact the member, CMS recommends including the last good faith effort made within the notification timeframe.</td>
</tr>
<tr>
<td>AA</td>
<td>Date written notification provided to member</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date written notification provided to member. The term &quot;provided&quot; means when the letter left the MMP's establishment by US Mail, fax, or electronic communication. Do not enter the date a letter is generated or printed within the MMP's organization. Submit in <strong>CCYY/MM/DD</strong> format (e.g., 2017/01/01). Answer <strong>NA</strong> if no written notification.</td>
</tr>
<tr>
<td>AB</td>
<td>Time written notification provided to member</td>
<td>CHAR Always Required</td>
<td>8</td>
<td>Time written notification provided to member. Submit in <strong>HH:MM:SS</strong> military time format (e.g., 23:59:59). Answer <strong>NA</strong> if no written notification was provided.</td>
</tr>
<tr>
<td>AC</td>
<td>Date service authorization entered/effectuated in the MMP's system</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date service authorization/approval was entered in the MMP'S system. Submit in <strong>CCYY/MM/DD</strong> format (e.g., 2017/01/01). Answer NA for denials. Note: This is the point at which the member could obtain the service.</td>
</tr>
<tr>
<td>AD</td>
<td>Time service authorization entered/effectuated in the MMP's system</td>
<td>CHAR Always Required</td>
<td>8</td>
<td>Time service authorization/approval entered in the MMP'S system. Submit in <strong>HH:MM:SS</strong> military time format (e.g., 23:59:59). Answer NA for denials. Note: This is the point at which the member could obtain the service.</td>
</tr>
<tr>
<td>AE</td>
<td>AOR Receipt date</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date the Appointment of Representative (AOR) form or other appropriate documentation received by the MMP. Submit in <strong>CCYY/MM/DD</strong> format (e.g., 2017/01/01). Answer <strong>NA</strong> if no AOR form was required.</td>
</tr>
<tr>
<td>AF</td>
<td>AOR Receipt time</td>
<td>CHAR Always Required</td>
<td>8</td>
<td>Time the Appointment of Representative (AOR) form or other appropriate documentation received by the MMP. Submit in <strong>HH:MM:SS</strong> military format (e.g., 23:59:59). Answer <strong>NA</strong> if no AOR form was required.</td>
</tr>
<tr>
<td>AG</td>
<td>First Tier, Downstream, and Related Entity</td>
<td>CHAR Always Required</td>
<td>70</td>
<td>Insert the name of the First Tier, Downstream, and Related Entity that processed the standard organization determination (e.g., Independent Physician Association, Physicians Medical Group or Third Party Administrator). Answer <strong>NA</strong> if not applicable.</td>
</tr>
<tr>
<td><strong>Member First Name</strong></td>
<td><strong>Member Last Name</strong></td>
<td><strong>Cardholder ID</strong></td>
<td><strong>Contract ID</strong></td>
<td><strong>Plan ID</strong></td>
</tr>
<tr>
<td>----------------------</td>
<td>----------------------</td>
<td>------------------</td>
<td>-----------------</td>
<td>-------------</td>
</tr>
<tr>
<td>First name of the member.</td>
<td>Last name of the member.</td>
<td>Cardholder identifier used to identify the member. This is assigned by the MMP.</td>
<td>The contract number of the organization. Note: H535 identifies the CMC line of business</td>
<td>The plan number of the organization. Note: IEHP's assigned Plan ID Number is 001</td>
</tr>
<tr>
<td>N</td>
<td>F</td>
<td>Q</td>
<td>R</td>
<td>S</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Level of Service</td>
<td>Identify whether the Request involves any of the Following Scenarios:</td>
<td>Subsequent Expedited Request</td>
<td>If an Extension was taken, did the MMP notify the Member of the Reason(s) for the Delay and of their Right to an Expedited Grievance?</td>
<td>Date of MMP Decision</td>
</tr>
<tr>
<td></td>
<td>1) Authorization for Treatment Regimen already in Place</td>
<td>Was a Timeframe Extension Taken?</td>
<td>Request Disposition</td>
<td>Date of MMP Decision</td>
</tr>
<tr>
<td></td>
<td>2) Retrospective Authorization (Service already Provided)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>3) Routine Authorizations (Requests for Specialty Service, Cost Control purposes, Out-of-Network not otherwise exempt from Prior Authorization)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Provide the level of service requested (e.g., inpatient/outpatient / ER / post stabilization care / urgent care / point of sale / transaction / home healthcare). Insert "NA" if none of the above categories apply.

If a request to expedite the service authorization request was made after the request was received, indicate who made the subsequent request to expedite: contract provider (CP), non-contract provider (NCP), member (M), member's representative (MR), or MMP/sponsor (S). Answer NA if no subsequent expedited timeframe was requested.

Yes (Y) / No (N) / Not Applicable (NA) indicator of whether the MMP notified the member of the delay. Answer NA if no extension was taken.

Yes (Y) / No (N) indicator of whether the MMP notified the member of the delay. Answer NA if no extension was taken.

Status of the request: Valid values are: Approved or Denied. MMPs should note any requests that are unresolved and not yet resolved (still outstanding) as denied. All unresolved and pending cases should be treated as denials for the purposes of populating the rest of this record layout's fields.

If Denied for Lack of Medical Necessity, was the Review completed by a Physician or other Appropriate Health Care Professional? Answer "NA" if the request was approved or not denied due to lack of medical necessity.

Status of the request: Valid values are: Approved or Denied. MMPs should note any requests that are unresolved and not yet resolved (still outstanding) as denied. All unresolved and pending cases should be treated as denials for the purposes of populating the rest of this record layout's fields.

Note: This is separate from effectuation, notice, etc. This is the determination to approve/deny and may not be a captured field but rather a field to be populated from notes.

Date oral notification provided to member. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer "NA" if no oral notification. If good faith effort was made to contact the member, CMS recommends including the last good faith effort made within the notification timeframe.

Time oral notification provided to member. Submit in HH:MM:SS military time format (e.g., 23:59:59). Answer "NA" if no oral notification. If good faith effort was made to contact the member, CMS recommends including the last good faith effort made within the notification timeframe.
<table>
<thead>
<tr>
<th>AA</th>
<th>AB</th>
<th>AC</th>
<th>AD</th>
<th>AE</th>
<th>AF</th>
<th>AG</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date Written Notification Provided to Member</td>
<td>Time Written Notification provided to Member</td>
<td>Date Service Authorization Entered / Effectuated in the MMP’s System</td>
<td>Time Service Authorization Entered / Effectuated in the MMP’s System</td>
<td>AOR Receipt Date</td>
<td>AOR Receipt Time</td>
<td>First Tier, Downstream, and Related Entity.</td>
</tr>
</tbody>
</table>

Date written notification provided to member. The term “provided” means when the letter left the MMP’s establishment by US Mail, fax, or electronic communication. Do not enter the date a letter is generated or printed within the MMP’s organization. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer NA if no written notification was provided.

Time written notification provided to member. Submit in HH:MM:SS military time format (e.g., 23:59:59). Answer NA if no written notification was provided.

Date service authorization/approval was entered in the MMP’s system. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer NA for denial.

Time service authorization/approval entered in the MMP’s system. Submit in HH:MM:SS military format (e.g., 23:59:59). Answer NA for denial.

Date the Appointment of Representative (AOR) form or other appropriate documentation received by the MMP. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer NA if no AOR form was required.

Time the Appointment of Representative (AOR) form or other appropriate documentation received by the MMP. Submit in HH:MM:SS military format (e.g., 23:59:59). Answer NA if no AOR form was required.

Insert the name of the First Tier, Downstream, and Related Entity that processed the standard organization determination (e.g., Independent Physician Association, Physicians Medical Group or Third Party Administrator). Answer NA if not applicable.
# IEHP Universe MMP Provider Payment Request (M_Claims) Data Dictionary

<table>
<thead>
<tr>
<th>Column ID</th>
<th>Field Name</th>
<th>Field Type</th>
<th>Field Length</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Member First Name</td>
<td>CHAR</td>
<td>Always Required</td>
<td>50</td>
</tr>
<tr>
<td>B</td>
<td>Member Last Name</td>
<td>CHAR</td>
<td>Always Required</td>
<td>50</td>
</tr>
<tr>
<td>C</td>
<td>Cardholder ID</td>
<td>CHAR</td>
<td>Always Required</td>
<td>20</td>
</tr>
<tr>
<td>D</td>
<td>Contract ID</td>
<td>CHAR</td>
<td>Always Required</td>
<td>5</td>
</tr>
<tr>
<td>E</td>
<td>Plan ID</td>
<td>CHAR</td>
<td>Always Required</td>
<td>3</td>
</tr>
<tr>
<td>F</td>
<td>Authorization or Claim Number</td>
<td>CHAR</td>
<td>Always Required</td>
<td>40</td>
</tr>
<tr>
<td>G</td>
<td>Provider Type</td>
<td>CHAR</td>
<td>Always Required</td>
<td>3</td>
</tr>
<tr>
<td>H</td>
<td>Is this a clean claim?</td>
<td>CHAR</td>
<td>Always Required</td>
<td>2</td>
</tr>
<tr>
<td>I</td>
<td>Date the request was received</td>
<td>CHAR</td>
<td>Always Required</td>
<td>10</td>
</tr>
<tr>
<td>J</td>
<td>Diagnosis</td>
<td>CHAR</td>
<td>Always Required</td>
<td>100</td>
</tr>
<tr>
<td>K</td>
<td>Type of service</td>
<td>CHAR</td>
<td>Always Required</td>
<td>50</td>
</tr>
<tr>
<td>L</td>
<td>Issue Description</td>
<td>CHAR</td>
<td>Always Required</td>
<td>2,000</td>
</tr>
<tr>
<td>Column ID</td>
<td>Field Name</td>
<td>Field Type</td>
<td>Field Length</td>
<td>Description</td>
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</tr>
<tr>
<td>M</td>
<td>Level of Service</td>
<td>CHAR Always Requested</td>
<td>50</td>
<td>Provide the level of service requested (e.g., inpatient / outpatient / ER / post stabilization care / urgent care / point of sale transaction / home healthcare).</td>
</tr>
<tr>
<td>N</td>
<td>Request Disposition</td>
<td>CHAR Always Requested</td>
<td>8</td>
<td>Status of the request. Valid values are: Approved or Denied. MMPs should note any requests that are untimely and not yet resolved (still outstanding) as denied. All untimely and pending cases should be treated as denials for the purposes of populating the rest of this record layout's fields.</td>
</tr>
<tr>
<td>O</td>
<td>Date the claim was paid or denied</td>
<td>CHAR Always Requested</td>
<td>10</td>
<td>Date the Claim was paid. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer DENIED for claims that were denied. Answer NA for untimely cases that are still open.</td>
</tr>
<tr>
<td>P</td>
<td>Was interest paid on the Claim?</td>
<td>CHAR Always Requested</td>
<td>1</td>
<td>Yes (Y) / No (N) indicator of whether interest was paid on the claim.</td>
</tr>
<tr>
<td>Q</td>
<td>Was the request denied for lack of medical necessity?</td>
<td>CHAR Always Requested</td>
<td>2</td>
<td>Yes (Y) / No (N) indicator of whether the request was denied for lack of medical necessity. Answer NA if the request was approved. Answer No if the request was denied because it was untimely.</td>
</tr>
<tr>
<td>R</td>
<td>If denied for lack of medical necessity, was the review completed by a physician or other appropriate health care professional?</td>
<td>CHAR Always Requested</td>
<td>2</td>
<td>Yes (Y) / No (N) indicator of review by a physician or other appropriate health care professional if request was denied for lack of medical necessity. Answer NA if the request was approved or not denied due to lack of medical necessity.</td>
</tr>
<tr>
<td>S</td>
<td>Date written notification provided to member</td>
<td>CHAR Always Requested</td>
<td>10</td>
<td>Date written notification provided to member. The term &quot;provided&quot; means when the letter left the MMP's establishment by US Mail, fax, or electronic communication. Do not enter the date a letter is generated or printed within the MMP's organization. If no proof of mailing is available, populate based on worst case scenario according to policies in place. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer NA if no written notification provided to the member.</td>
</tr>
<tr>
<td>Column ID</td>
<td>Field Name</td>
<td>Field Type</td>
<td>Field Length</td>
<td>Description</td>
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<tr>
<td>T</td>
<td>Date written notification provided to provider</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date written notification provided to enrollee. The term &quot;provided&quot; means when the EOB, IDN or letter left the sponsor's establishment by US Mail, fax, or electronic communication. Do not enter the date a letter is generated or printed within the sponsor's organization. Submit in <strong>CCYY/MM/DD</strong> format (e.g., 2017/01/01). Answer <strong>Pending</strong> if written notification has not yet been provide, but is anticipated to be provided in a forthcoming EOB or IDN notice. Answer <strong>NA</strong> if no written notification provided to the enrollee.</td>
</tr>
<tr>
<td>U</td>
<td>First Tier, Downstream, and Related Entity</td>
<td>CHAR Always Required</td>
<td>70</td>
<td>Insert the name of the First Tier, Downstream, and Related Entity that processed the standard organization determination (e.g., Independent Physician Association, Physicians Medical Group or Third Party Administrator). Answer NA if not applicable.</td>
</tr>
<tr>
<td>A</td>
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</tr>
<tr>
<td>Member First Name</td>
<td>Member Last Name</td>
<td>Cardholder ID</td>
<td>Contract ID</td>
<td>Plan ID</td>
</tr>
<tr>
<td></td>
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</tr>
</tbody>
</table>

- **Member First Name**: First name of the member.
- **Member Last Name**: Last name of the member.
- **Cardholder ID**: Cardholder identifier used to identify the member. This is assigned by the MMP. Note: IEHP 14 digit ID Number
- **Contract ID**: The contract number of the organization. Note: H5355 identifies the CMC line of business
- **Plan ID**: The plan number of the organization. Note: IEHP's assigned Plan ID Number is 001
- **Authorization or Claim Number**: The associated claim or payment request number assigned by the MMP for this request. If a claim or payment request number is not available then insert (N/A) if there is no claim, payment request or other tracking number available.
- **Provider Type**: Indicate whether the provider who performed the service is a contract provider (CP) or non-contract provider (NCP). Note: the term "provider" encompasses physicians and DMEs.
- **Is this a Clean Claim?**: Indicate whether the claim is a clean (Y) or unclean (N). Answer NA for delay requests that are still open if claim status has not been determined.
- **Date the Request was Received**: Provide the date the payment request was received by your organization. Submit in CCYY/MM/DD format (e.g., 2017/01/01).
- **Diagnosis**: Provide the member Diagnosis/Diagnoses ICD-10 codes related to this request. If the ICD codes are unavailable, provide a description of the diagnosis, or for drugs provide the 11-digit National Drug Code (NDC) as well as the ICD-10 code related to the request. Enter "BH" for Behavioral Health services, "LTSS" for Long Term Services and Supports, ''SU" for Substance Use services. Other service types might include, but are not limited to: DME, SNF care, dental, etc.
- **Type of Service**: Provide a description of the service, medical supply or drug requested and why it was requested (if known). For denials, also provide an explanation of why the claim was denied.
- **Issue Description**: Provide a description of the service, medical supply or drug requested and why it was requested (if known).
- **Level of Service**: Provide the level of service requested (e.g., inpatient/outpatient / ER / post stabilization care / urgent care / point of sale transaction / home healthcare).
- **Request Disposition**: Status of the request. Valid values are: "Approved" or "Denied." MMPs should note any requests that are denied and not yet processed (still outstanding) as denied. All rejected and pending cases should be noted as pending. Denials are noted by the purposes of populated the rest of the record layout's fields.
<table>
<thead>
<tr>
<th>Date the Claim was Paid or Denied</th>
<th>Was Interest Paid on the Claim?</th>
<th>Was the Request Denied for Lack of Medical Necessity?</th>
<th>If denied for Lack of Medical Necessity, was the Review completed by a Physician or other appropriate Health Care Professional?</th>
<th>Date Written Notification Provided to Member</th>
<th>Date Written Notification Provided to Provider</th>
<th>First Tier, Downstream, and Related Entity.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer DENIED for claims that were denied. Answer NA for claims that are still open.</td>
<td>Yes (Y) / No (N) indicator of whether interest was paid on the claim.</td>
<td>Yes (Y) / No (N) indicator of whether the request was denied for lack of medical necessity. Answer NA if the request was approved.</td>
<td>Yes (Y) / No (N) indicator of whether the request was denied for lack of medical necessity. Answer NA if the request was approved.</td>
<td>Date written notification provided to member. The term “provided” means when the letter left the MMP’s establishment by US Mail, fax, or electronic communication. Do not enter the date a letter is generated or printed within the MMP’s organization. If no proof of mailing is available, submit the worst-case-scenario according to policies in place. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer NA if no written notification provided to the member.</td>
<td>Date written notification provided to provider. The term “provided” means when the EOB or letter left the sponsor’s establishment by US Mail, fax, or electronic communication. Do not enter the date a letter is generated or printed within the sponsor’s organization. Answer NA if no written notification provided to the enrollee.</td>
<td>Insert the name of the First Tier, Downstream, and Related Entity that processed the claim (e.g., Independent Physician Association, Physicians Medical Group or Third Party Administrator). Answer NA if not applicable.</td>
</tr>
<tr>
<td>Column ID</td>
<td>Field Name</td>
<td>Field Type</td>
<td>Field Length</td>
<td>Description</td>
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</tr>
<tr>
<td>A</td>
<td>Member First Name</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 50 First name of the member</td>
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</tr>
<tr>
<td>B</td>
<td>Member Last Name</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 50 Last name of the member</td>
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</tr>
<tr>
<td>C</td>
<td>Cardholder ID</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 20 Cardholder identifier used to identify the beneficiary. This is assigned by the MMP. Note: IEHP 14 digit ID Number.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>D</td>
<td>Contract ID</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 5 The contract number of the organization. Note: <strong>H5355</strong> identifies the CMC line of business.</td>
<td></td>
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</tr>
<tr>
<td>E</td>
<td>Plan ID</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 3 The plan number of the organization. Note: IEHP's assigned Plan ID is <strong>001</strong></td>
<td></td>
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</tr>
<tr>
<td>F</td>
<td>Authorization or Claim Number</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 40 The associated authorization number assigned by the MMP for this request. If an authorization number is not available, please provide your internal tracking or case number. Answer NA if there is no authorization or other tracking number available.</td>
<td></td>
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</tr>
<tr>
<td>G</td>
<td>Who made the request</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 3 Indicate whether the service authorization request was made by a contract provider (CP), non-contract provider (NCP), member (M) or member's representative (MR). Note: The term &quot;provider&quot; encompasses physicians and facilities.</td>
<td></td>
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</tr>
<tr>
<td>H</td>
<td>Provider Type</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 3 Indicate whether the provider performing the service is a contract provider (CP) or non-contract provider (NCP).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I</td>
<td>Date the request was received</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 10 Provide the date the request was received by your organization. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Note: This is the original receipt of the request by the MMP or delegated entity and not the date that the request became valid via an AOR.</td>
<td></td>
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</tr>
<tr>
<td>J</td>
<td>Diagnosis</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 100 Provide the member diagnosis/diagnoses ICD-10 codes related to this request. If the ICD codes are unavailable, provide a description of the diagnosis, or for drugs provide the 11-digit National Drug Code (NDC) as well as the ICD-10 code related to the request.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>K</td>
<td>Type of service</td>
<td>CHAR</td>
<td>Always</td>
<td>Required 50 Enter &quot;BH&quot; for Behavioral Health services, &quot;LTSS&quot; for Long Term Services and Supports, &quot;SU&quot; for Substance Use services. Other service / benefit types might include, but are not limited to DME, SNF care, dental, vision, etc.</td>
<td></td>
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<tr>
<td>Column ID</td>
<td>Field Name</td>
<td>Field Type</td>
<td>Field Length</td>
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<tr>
<td>L</td>
<td>Issue Description</td>
<td>CHAR Always Required</td>
<td>2,000</td>
<td>Provide a description of the service, medical supply or drug requested and why it was requested (if known). For denials, also provide an explanation of why the service request was denied.</td>
<td></td>
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<tr>
<td>M</td>
<td>Level of Service</td>
<td>CHAR Always Requested</td>
<td>50</td>
<td>Provide the level of service requested (e.g., inpatient / outpatient / ER / post stabilization care / urgent care / point of sale transaction / home healthcare).</td>
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<tr>
<td>N</td>
<td></td>
<td></td>
<td></td>
<td>Does not apply to California and so is not on the template. Applies to New York only.</td>
<td></td>
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</tr>
<tr>
<td>O</td>
<td>Identify whether the request involves any of the following scenarios: 1) authorization for treatment regimen already in place, 2) retrospective authorization (service already provided), or 3) Routine authorizations (requests for specialty service, cost control purposes, out-of-network not otherwise exempt from prior authorization)</td>
<td>CHAR Always Required</td>
<td>50</td>
<td>For California MMPs- identify whether any of the following scenarios applies to the service request: 1) authorization for treatment regimen already in place, 2) retrospective authorization (service already provided), or 3) Routine authorizations (requests for specialty service, cost control purposes, out-of-network not otherwise exempt from prior authorization). CA MMPs should enter &quot;NA&quot; if none of the above categories apply, and all other MMPs may enter &quot;NA&quot; for this column.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>P</td>
<td>Was request made under the expedited timeframe, but processed by the plan under the standard timeframe?</td>
<td>CHAR Always Required</td>
<td>1</td>
<td>Yes (Y)/No (N) indicator of whether the request was made under an expedited timeframe but was processed under a standard timeframe.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q</td>
<td>Request for expedited timeframe</td>
<td>CHAR Always Required</td>
<td>3</td>
<td>If there was a request expedite the service authorization request after it was initially requested, indicate who made the subsequent request to expedite the request: contract provider (CP), non-contract provider (NCP), member (M), member’s representative (MR), Service Coordinator / Care Coordinator (SC), or the MMP / sponsor (S). Answer NA if no expedited timeframe request was made after the service authorization was submitted.</td>
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</tr>
<tr>
<td>Column ID</td>
<td>Field Name</td>
<td>Field Type</td>
<td>Field Length</td>
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<tr>
<td>R</td>
<td>Was a timeframe extension taken?</td>
<td>CHAR Always Required</td>
<td>2</td>
<td>Yes (Y) / No (N) / Not Applicable (NA) indicator of whether the MMP extended the timeframe to make the service authorization decision.</td>
<td></td>
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</tr>
<tr>
<td>S</td>
<td>If an extension was taken, did the MMP notify the member of the reason(s) for the delay and of their right to file an expedited grievance?</td>
<td>CHAR Always Required</td>
<td>2</td>
<td>Yes (Y) / No (N) indicator of whether the MMP notified the member of the delay. Answer NA if no extension was taken.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>T</td>
<td>Request Disposition</td>
<td>CHAR Always Required</td>
<td>8</td>
<td>Status of the request. Valid values are: Approved or Denied. MMPs should note any requests that are untimely and not yet resolved (still outstanding) as denied. All untimely and pending cases should be treated as denials for the purposes of populating the rest of this record layout's fields.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>U</td>
<td>Date of MMP decision</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date of the MMP decision. Submit in CCYY/MM/DD format (e.g., 2017/01/01). MMPs should answer NA for untimely cases that are still open. Note: This is separate from effectuation, notice, etc. This is the determination to approve/deny and may not be a captured field but rather a field to be populated from notes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>V</td>
<td>Was the request denied for lack of medical necessity?</td>
<td>CHAR Always Required</td>
<td>2</td>
<td>Yes (Y) / No (N) indicator of whether the request was denied for lack of medical necessity. Answer NA if the request was approved. Answer No if the request was denied because it was untimely.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>W</td>
<td>If denied for lack of medical necessity, was the review completed by a physician or other appropriate health care professional?</td>
<td>CHAR Always Required</td>
<td>2</td>
<td>Yes (Y) / No (N) indicator of review by a physician or other appropriate health care professional if request was denied for lack of medical necessity. Answer NA if the request was approved or not denied due to lack of medical necessity.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>X</td>
<td>Date oral notification provided to member</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date oral notification provided to member. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer NA if no oral notification. If good faith effort was made to contact the member, CMS recommends including the last good faith effort made within the notification timeframe.</td>
<td></td>
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</tr>
<tr>
<td>Y</td>
<td>Date written notification provided to member</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date written notification provided to member. The term &quot;provided&quot; means when the letter left the MMP's establishment by US Mail, fax, or electronic communication. Do not enter the date a letter is generated or printed within the MMP's organization. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer NA if no written notification.</td>
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<tr>
<td>Column ID</td>
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<td>Field Type</td>
<td>Field Length</td>
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</tr>
<tr>
<td>Z</td>
<td>Date service authorization entered/effectuated in the MMP's system</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date service authorization entered in the MMP’S system. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer NA for denials. Date service authorization / approval entered in the MMP's system. Note: This is the point at which the member could obtain the service.</td>
<td></td>
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</tr>
<tr>
<td>AA</td>
<td>AOR Receipt date</td>
<td>CHAR Always Required</td>
<td>10</td>
<td>Date the Appointment of Representative (AOR) form or other appropriate documentation received by the MMP. Submit in CCYY/MM/DD format (e.g., 2017/01/01). Answer NA if no AOR form was required.</td>
<td></td>
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</tr>
<tr>
<td>AB</td>
<td>First Tier, Downstream, and Related Entity</td>
<td>CHAR Always Required</td>
<td>70</td>
<td>Insert the name of the First Tier, Downstream, and Related Entity that processed the standard organization determination (e.g., Independent Physician Association, Physicians Medical Group or Third Party Administrator). Answer NA if not applicable.</td>
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<td>A</td>
<td>B</td>
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<tr>
<td>Member First Name</td>
<td>Member Last Name</td>
<td>Cardholder ID</td>
<td>Contract ID</td>
<td>Plan ID</td>
<td>Authorization or Claim Number</td>
<td>Who Made the Request</td>
</tr>
<tr>
<td>First name of the member.</td>
<td>Last name of the member.</td>
<td>Cardholder identifier used to identify the member. This is assigned by the MMP. Note: IEHP 14 digit ID Number</td>
<td>The contract number of the organization. Note: IEHP’s assigned Plan ID Number is 001</td>
<td>The plan number of the organization. Note: IEHP’s assigned Plan ID Number is 001</td>
<td>The associated authorization number assigned by the MMP for this request. If an authorization number is not available, please provide your internal tracking or case number. Answer NA if there is no authorization or other tracking number available.</td>
<td>Indicate whether the service authorization request was made by a contract provider (CP), non-contract provider (NCP), member (M), member’s representative (MR), or Service Coordinator / Care Coordinator (SC). Note: the term “provider” encompasses physicians and facilities.</td>
</tr>
</tbody>
</table>

Enter "BH" for Behavioral Health services, "LTSS" for Long Term Services and Supports, "SIF" for Substance Use services. Other service/benefit codes might include, but are not limited to, DME, SNF care, dental, vision, etc. 
<table>
<thead>
<tr>
<th>Q</th>
<th>P</th>
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<th>U</th>
<th>V</th>
<th>W</th>
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</thead>
<tbody>
<tr>
<td>Identify whether the Request involves any of the Following Scenarios:</td>
<td></td>
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<tr>
<td>1) Authorization for Treatment Regimen already in Place</td>
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<td>2) Retrospective Authorization (Service already Provided)</td>
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<tr>
<td>3) Routine Authorizations (Requests for Specialty Service, Cost Control purposes, Out-of-Network not otherwise exempt from Prior Authorization)</td>
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</table>

Enter "NA" if none of the above categories apply.

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<thead>
<tr>
<th>X</th>
<th>Y</th>
<th>Z</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of MMP Decision</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Was the Request made under the Expedited timeframe, but processed by the plan under the Standard Timeframe?</td>
<td></td>
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<tr>
<td>Request for Expedited Timeframe</td>
<td></td>
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<tr>
<td>Was a Timeframe Extension Taken?</td>
<td></td>
<td></td>
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<tr>
<td>If an Extension was taken, did the MMP notify the Member of the Reason(s) for the Delay and of their Right to file an Expedited Grievance?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Request Disposition</td>
<td>Date of MMP Decision</td>
<td>Was the Request Denied for Lack of Medical Necessity?</td>
</tr>
<tr>
<td>Date Oral Notification Provided to Member</td>
<td>Date Written Notification Provided to Member</td>
<td>Date Service Authorization Entered / Effectuated in the MMP’s System</td>
</tr>
</tbody>
</table>

- **Yes (Y):** INDICATES whether the request was made under an expedited timeframe, but was processed under a standard timeframe.
- **No (N):** INDICATES whether the request was made under an expedited timeframe, but was processed under a standard timeframe.
- **Not Applicable (NA):** INDICATES whether the request was made under an expedited timeframe, but was processed under a standard timeframe.

Note: This is separate from effectuation, notice, etc. This is the determination to approve/deny and may not be a captured field but rather a field to be populated from notes.

- **Approved:** Indicate whether the MMP notified the member of the denial, Answer NA if no extension was taken.
- **Denied:** Indicate whether the MMP notified the member of the denial, Answer NA if no extension was taken.

Date of MMP Decision: Submit in CCYY/MM/DD format (e.g., 2017/01/01). MMPs should answer NA for untimely cases that are still open.

Date of MMP Decision: Submit in CCYY/MM/DD format (e.g., 2017/01/01). MMPs should answer NA for untimely cases that are still open.

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Date of MMP Decision: Submit in CCYY/MM/DD format (e.g., 2017/01/01). MMPs should answer NA for untimely cases that are still open.
<table>
<thead>
<tr>
<th>AOR Receipt Date</th>
<th>First Tier, Downstream, and Related Entity.</th>
</tr>
</thead>
</table>

Date the Appointment of Representative (AOR) form or other appropriate documentation received by the MMP. Submit in CCYY/MM/DD format (e.g., 2017/01/01); Answer NA if no AOR form was required.

Insert the name of the First Tier, Downstream, and Related Entity that processed the standard organization determination (e.g., Independent Physician Association, Physicians Medical Group or Third Party Administrator). Answer NA if not applicable.
### NCQA QI 1: Program Structure

The organization clearly defines its quality improvement (QI) structures and processes and assigns responsibility to appropriate individuals.

#### Element A - QI Program Structure

The organization's QI program description specifies:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Score</th>
<th>Location</th>
<th>Comment/Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 The QI program structure</td>
<td>0</td>
<td>0.5</td>
<td>1 Location in QI Program Description (Include page and section numbers)</td>
</tr>
<tr>
<td>2 Involvement of a designated physician in the QI program.</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Oversight of QI functions of the organization by the QI Committee.</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 An annual work plan.*</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 Objectives for serving a culturally and linguistically diverse membership.</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Critical factors

#### COMMENTS:

<table>
<thead>
<tr>
<th>Total Requirements Element A - QI Program Structure</th>
<th>Score</th>
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</thead>
<tbody>
<tr>
<td>Requirement Met</td>
<td>5</td>
</tr>
<tr>
<td>% of Requirement Met</td>
<td>0%</td>
</tr>
</tbody>
</table>

#### Element B - Annual Evaluation

The organization conducts an annual written evaluation of the QI program that includes the following information:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Score</th>
<th>Location</th>
<th>Comment/Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 A description of completed and ongoing QI activities that address quality and safety of clinical care and quality of service.</td>
<td>X</td>
<td>Location in Annual Evaluation (include document and tab titles)</td>
<td>Evaluated during Annual Evaluation review</td>
</tr>
<tr>
<td>2 Trending of measures to assess performance in the quality and safety of clinical care and quality of service.</td>
<td>X</td>
<td></td>
<td>Evaluated during Annual Evaluation review</td>
</tr>
<tr>
<td>3 Analysis and evaluation of the overall effectiveness of the QI program and its progress toward influencing networkwide safe clinical practices.</td>
<td>X</td>
<td></td>
<td>Evaluated during Annual Evaluation review</td>
</tr>
</tbody>
</table>

#### COMMENTS:

<table>
<thead>
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<th>Total Requirements Element B - Annual Evaluation</th>
<th>Score</th>
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<tbody>
<tr>
<td>Requirement Met</td>
<td>3</td>
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<tr>
<td>% of Requirement Met</td>
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</table>

### NCQA QI 2: Program Operations

The organization's QI program is operational.

#### Element A - QI Committee Responsibilities

The organization's QI Committee:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Score</th>
<th>Location</th>
<th>Comment/Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Recommends policy decisions.</td>
<td>X</td>
<td>0.5</td>
<td>1 Location in QI Committee Minutes (include page and section numbers)</td>
</tr>
<tr>
<td>2 Analyzes and evaluates the results of QI activities.</td>
<td>X</td>
<td></td>
<td>Evaluated during DOA visit</td>
</tr>
<tr>
<td>3 Ensures practitioner participation in the QI program through planning, design, implementation or review.</td>
<td>X</td>
<td></td>
<td>Evaluated during DOA visit</td>
</tr>
<tr>
<td>4 Identifies needed actions.</td>
<td>X</td>
<td></td>
<td>Evaluated during DOA visit</td>
</tr>
<tr>
<td>5 Ensures follow-up, as appropriate.</td>
<td>X</td>
<td></td>
<td>Evaluated during DOA visit</td>
</tr>
</tbody>
</table>

#### COMMENTS:

<table>
<thead>
<tr>
<th>Total Requirements Element A - QI Committee Responsibilities</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Requirement Met</td>
<td>5</td>
</tr>
<tr>
<td>% of Requirement Met</td>
<td>0%</td>
</tr>
</tbody>
</table>

### NCQA NET 5: Continued Access to Care

The organization monitors and takes action, as necessary, to improve continuity and coordination of care across the health care network.

#### Element A - Notification of Termination

The organization notifies members affected by the termination of a practitioner or practice group in general, family or internal medicine or pediatrics, at least 30 calendar days prior to the effective termination date, and helps them select a new practitioner.

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Score</th>
<th>Location</th>
<th>Comment/Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 The organization notifies members affected by the termination of a practitioner or practice group in general, family or internal medicine or pediatrics, at least 30 calendar days prior to the effective termination date, and helps them select a new practitioner.</td>
<td>X</td>
<td>0.5</td>
<td>1 Location in Policy (include policy title, page, and section numbers)</td>
</tr>
</tbody>
</table>

#### COMMENTS:

<table>
<thead>
<tr>
<th>Total Requirements Element A - Notification of Termination</th>
<th>Score</th>
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</thead>
<tbody>
<tr>
<td>Requirement Met</td>
<td>1</td>
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<tr>
<td>% of Requirement Met</td>
<td>0%</td>
</tr>
</tbody>
</table>

#### Element B - Continued Access to Practitioners

If a practitioner's contract is discontinued, the organization allows affected members continued access to the practitioner, as follows:

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Score</th>
<th>Location</th>
<th>Comment/Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Continuation of treatment through the current period of active treatment, or for up to 90 calendar days, whichever is less, for members undergoing active treatment for a chronic or acute medical condition.</td>
<td>X</td>
<td>0.5</td>
<td>1 Location in Policy (include policy title, page, and section numbers)</td>
</tr>
<tr>
<td>2 Continuation of care through the postpartum period for members in their second or third trimester of pregnancy.</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### COMMENTS:

<table>
<thead>
<tr>
<th>Total Requirements Element B - Continued Access to Practitioners</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Requirement Met</td>
<td>2</td>
</tr>
<tr>
<td>% of Requirement Met</td>
<td>0%</td>
</tr>
</tbody>
</table>
INLAND EMPIRE HEALTH PLAN
REQUEST FOR UM CRITERIA LOG

Submitted by: ______________________________  Log for Year: ______________________________

<table>
<thead>
<tr>
<th>Date Requested</th>
<th>Date Sent</th>
<th>Sent via:</th>
<th>Name of the Requesting Practitioner or Member</th>
<th>Member Name and IEHP ID #</th>
<th>Line of Business (MC, CMC)</th>
<th>Criteria Requested (i.e. InterQual-MRI Brain)</th>
<th>Reason for Request</th>
<th>Medical Necessity</th>
<th>Benefit</th>
<th>Carve-Out</th>
<th>Out-of-Network</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>F = fax</td>
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</table>

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>
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
This form is to be completed for all ancillary services where the IPA/MSO has established a contract directly with a facility or agency.

Directions:
1. Mark yes or no (Y or N) for each Service listed where your IPA/MSO has established a contract.
2. In the CONTRACTED FACILITY/AGENCY list the name of each contracting facility or agency.
3. In the ACCREDITED BY column, indicate if the facility or agency is accredited and by whom. In the DELEGATED FUNCTION column mark X in each row where your IPA/MSO has delegated any functions.

### ANCILLARY SERVICE REVIEW

<table>
<thead>
<tr>
<th>Service</th>
<th>Y</th>
<th>N</th>
<th>Capitated Services</th>
<th>Contracted Facility/Agency</th>
<th>Accredited by</th>
<th>Date Accreditation Expiration</th>
<th>Delegated Function</th>
<th>Date License Expiration</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Alcohol/Substance Abuse</td>
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<tr>
<td>2. Home Health Agency</td>
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<td>3. DME, Orthotics, Prosthesis</td>
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<td>4. Mental Health</td>
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<tr>
<td>5. Short-term Rehabilitation; P.T./O.T.</td>
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<td>6. Short-term Rehabilitation; Speech</td>
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<td>7. Hospice</td>
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<td>8. Infusion Center</td>
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<td>9. Renal Dialysis</td>
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<td>10. Family Planning</td>
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<td>11. Chiropractor</td>
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<td>12. Skilled Nursing Facilities</td>
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<tr>
<td>13. Tertiary Care Facility</td>
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<td>14. X-ray</td>
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<td>15. Ultrasound MRI/CT</td>
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<td>16. Laboratory</td>
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<td>17. Surgi-Centers</td>
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<tr>
<td>18. Urgent Care Centers</td>
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<tr>
<td>19. Transportation (ambulance, ambulances)</td>
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</tr>
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</table>

**Note:** The Delegated Credentialing function is evaluated separately.
# Delegated IPA Care Management Review Tool

**Medicare**

## Overall Score:

<table>
<thead>
<tr>
<th>IPA</th>
<th>Reviewer</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

**Service Year:** 2020  **Service Month:**  
**Review Year:** 2020  **Review Month:**

|-----------------|-----------|-----------------|-----------|-----------------|-----------|-----------------|-----------|-----------------|-----------|

<table>
<thead>
<tr>
<th><strong>Member Full Name</strong></th>
<th><strong>Member ID#</strong></th>
<th><strong>File Type</strong></th>
<th><strong>IEHP CMC Enrollment Date</strong></th>
<th><strong>IPA Eligibility Date</strong></th>
<th><strong>Date HRA was Posted on Provider Portal</strong></th>
<th><strong>Date IPA Retrieved HRA on Provider Portal</strong></th>
<th><strong>Date HRA was Reviewed by IPA</strong></th>
<th><strong>Member’s Current Stratification Level</strong></th>
<th><strong>Date Case Open</strong></th>
<th><strong>Date Case was Last Updated</strong></th>
<th><strong>Date Case Closed</strong></th>
<th><strong>Reason for Closure</strong></th>
<th><strong>Documentation of review of the HRA</strong></th>
<th><strong>Review of all available Member data</strong></th>
</tr>
</thead>
<tbody>
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<td><strong>Member ID#</strong></td>
<td><strong>File Type</strong></td>
<td><strong>IEHP CMC Enrollment Date</strong></td>
<td><strong>IPA Eligibility Date</strong></td>
<td><strong>Date HRA was Posted on Provider Portal</strong></td>
<td><strong>Date IPA Retrieved HRA on Provider Portal</strong></td>
<td><strong>Date HRA was Reviewed by IPA</strong></td>
<td><strong>Member’s Current Stratification Level</strong></td>
<td><strong>Date Case Open</strong></td>
<td><strong>Date Case was Last Updated</strong></td>
<td><strong>Date Case Closed</strong></td>
<td><strong>Reason for Closure</strong></td>
<td><strong>Documentation of review of the HRA</strong></td>
<td><strong>Review of all available Member data</strong></td>
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<tr>
<td><strong>Member Full Name</strong></td>
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<td><strong>IPA Eligibility Date</strong></td>
<td><strong>Date HRA was Posted on Provider Portal</strong></td>
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<td><strong>Member’s Current Stratification Level</strong></td>
<td><strong>Date Case Open</strong></td>
<td><strong>Date Case was Last Updated</strong></td>
<td><strong>Date Case Closed</strong></td>
<td><strong>Reason for Closure</strong></td>
<td><strong>Documentation of review of the HRA</strong></td>
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**File Review: #1 Comments:**  
**File Review: #2 Comments:**  
**File Review: #3 Comments:**  
**File Review: #4 Comments:**  
**File Review: #5 Comments:**

**Member Full Name**  
**Member ID#**  
**File Type**  
**IEHP CMC Enrollment Date**  
**IPA Eligibility Date**  
**Date HRA was Posted on Provider Portal**  
**Date IPA Retrieved HRA on Provider Portal**  
**Date HRA was Reviewed by IPA**  
**Member’s Current Stratification Level**  
**Date Case Open**  
**Date Case was Last Updated**  
**Date Case Closed**  
**Reason for Closure**  
**Documentation of review of the HRA**  
**Review of all available Member data**

- **If no HRA is available for review, an assessment is completed with Member.**
- **Care Plan developed with Member, and/or authorized representatives within 90 days of initial enrollment.**
- **Member given the ability to opt out or disenroll from the care plan process.**
- **Member and/or their authorized representative must have the opportunity to review and sign the care plan and any amendments.**
- **ICP has Member’s goals, preferences, measurable objectives, timetables and interventions meet medical, Behavioral Health and LTSS needs.**
- **Facilitates communication and coordination among Member’s medical and/or behavioral health care providers as appropriate.**
- **Provide Member with self-directed care options and assistance available to self direct care.**
- **ICT meetings conducted annually and was offered when a need was demonstrated by Member and/or representative.**
- **ICT documentation includes the dates, participants, notes and actions discussed during the ICT including any Member discussions.**
- **If the Member does not demonstrate the need for an ICT, there is documentation to support.**
- **Member given the ability to opt out of the ICT.**
- **Documentation of 3 attempts (different dates and times) for Member outreach prior to determining Member(s) is unable to reach.**
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<th>Care coordination of Member's mental health needs</th>
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<td>Documentation of unsuccessful outreach attempts to the Member for care coordination of Member's mental health needs</td>
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</table>
## Biographical Information

**Date of Review:**

**Surveyor:**

**Name of IPA:**

**IPA Code**

**Address:**

**City/State**

**Phone:**

**FAX:**

**Name of Management Company (if applicable)**

**Address:**

**City/State:**

**Phone:**

**FAX:**

### IPA Contact Personnel

<table>
<thead>
<tr>
<th>Role</th>
<th>Phone</th>
<th>FAX</th>
<th>E-Mail</th>
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<tbody>
<tr>
<td>IPA Administrator</td>
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<tr>
<td>Medical Director</td>
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<tr>
<td>QM Chairperson</td>
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<td>QM Contact/Title</td>
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<tr>
<td>UM Chairperson</td>
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<td>Compliance Contact/Title</td>
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### HEALTH PLAN CONTRACTS/ENROLLMENT

**IPA Total Enrollment in all participating health plans:**

**IPA total enrollment for each of the following:**

<table>
<thead>
<tr>
<th>Health Plan</th>
<th>Commercial</th>
<th>MediCare</th>
<th>MediCal</th>
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</thead>
</table>

**IPA Enrollment for (insert health plan) for each of the following:**

<table>
<thead>
<tr>
<th>Health Plan</th>
<th>Commercial</th>
<th>MediCare</th>
<th>MediCal</th>
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### CONTRACTED PHYSICIANS

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<tr>
<th>Total Number</th>
<th>Total number of PCP’s</th>
<th>Total number of specialist</th>
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<tr>
<td>Total number of OB’s:</td>
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<td>Total number of Pediatrics:</td>
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<tr>
<td>OB/GYN’s: yes no</td>
<td>Pediatrics: yes no</td>
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<tr>
<td>Capitated Specialist: (number/specialty)</td>
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</table>
### Offshore Subcontracts for Delegated Functions

**Name of offshore vendor:**

**Date of initial contract agreement:**

**City/State/Country:**

**Phone:**

**Fax:**

<table>
<thead>
<tr>
<th>Delegated Functions:</th>
<th>Care Management</th>
<th>Credentialing</th>
<th>Utilization Management</th>
<th>Claims</th>
</tr>
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### Offshore Subcontracts for Delegated Functions

**Name of offshore vendor:**

**Date of initial contract agreement:**

**City/State/Country:**

**Phone:**

**Fax:**

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<th>Delegated Functions:</th>
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<th>Utilization Management</th>
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**Date of initial contract agreement:**

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**Fax:**

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<tr>
<th>Delegated Functions:</th>
<th>Care Management</th>
<th>Credentialing</th>
<th>Utilization Management</th>
<th>Claims</th>
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</table>
## Monthly Medicare Care Plan Outreach Log 1.1
### Instructions & Data Dictionary

**Instructions:** This report must list all outreach attempts made to the Member or their Authorized Representative during the reporting month, for the purpose of developing or updating the Member's Individual Care Plan (ICP). If the IPA made multiple outreachs to the same Member in one month, then there should be multiple rows for that Member in one reporting month. Each outreach attempt only needs to be submitted once. Refer to the data dictionary for specifics on what each field should contain. Do not alter the templates in any way (e.g. adding or deleting columns or header rows). Always submit the most current template in Excel (.xlsx) format.

<table>
<thead>
<tr>
<th>Column ID</th>
<th>Field Name</th>
<th>Field Type</th>
<th>Field Length</th>
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<tbody>
<tr>
<td>A</td>
<td>Member First Name</td>
<td>CHAR Always Required</td>
<td>50</td>
<td>First name of the Member</td>
</tr>
<tr>
<td>B</td>
<td>Member Last Name</td>
<td>CHAR Always Required</td>
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<td>Last name of the Member</td>
</tr>
<tr>
<td>C</td>
<td>IEHP Member ID #</td>
<td>14 digit numeric characters</td>
<td>14</td>
<td>Cardholder identifier used to identify the beneficiary. This is assigned by IEHP and is 14 digits long.</td>
</tr>
<tr>
<td>D</td>
<td>DOB</td>
<td>MM/DD/YYYY</td>
<td>10</td>
<td>Member's Date of Birth</td>
</tr>
<tr>
<td>E</td>
<td>Date of Outreach Attempt</td>
<td>MM/DD/YYYY</td>
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<td>Date outreach attempt was made</td>
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<tr>
<td>F</td>
<td>Time of Outreach Attempt</td>
<td>HH:MM</td>
<td>5</td>
<td>Time outreach attempt was made in military time (e.g., 23:59)</td>
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<tr>
<td>G</td>
<td>Outreach Method</td>
<td>CHAR Always Required</td>
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<td>List method used for outreach: email, fax, in person, mail, phone or text</td>
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<tr>
<td>H</td>
<td>Outreach Disposition</td>
<td>CHAR Always Required</td>
<td>20</td>
<td>State outreach disposition: refused, successful, or unsuccessful</td>
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<tr>
<td>I</td>
<td>Outreach Care Team Member</td>
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<td>50</td>
<td>List the title of the Care Team Member who made the outreach</td>
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<tr>
<td>J</td>
<td>Clinical Care Team Member?</td>
<td>CHAR Always Required</td>
<td>3</td>
<td>Answer Yes or No: Is the Care Team Member, who made the outreach attempt, Clinical such as a Licensed Clinical Social Worker (LCSW), Licensed Vocational Nurse (LVN) or Registered Nurse (RN), etc.?</td>
</tr>
<tr>
<td>Member First Name</td>
<td>Member Last Name</td>
<td>IEHP Member ID number</td>
<td>DOB</td>
<td>Date of Outreach Attempt</td>
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</tr>
<tr>
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<td>Doe</td>
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Report for Month of: Date Submitted: Submitted By: Phone #:
## Monthly Medicare Care Plan Outreach Log Change Log

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### Medicare Provider Reporting Requirements Schedule

**IPA Medicare Calendar Year Reporting Period: 2020**

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### Medicare Provider Reporting Requirements Schedule

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## Medicare Provider Reporting Requirements Schedule

### IPA Medicare Calendar Year Reporting Period: 2020

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<thead>
<tr>
<th>IPA Deliverable</th>
<th>Report Frequency</th>
<th>CY 2020 Reporting Period</th>
<th>IEHP Due Date</th>
<th>IEHP Policy Number(s)</th>
<th>Department(s)</th>
<th>File Naming Convention</th>
<th>SFTP Folder</th>
<th>Regulatory Measure(s)</th>
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<td>MA 21C - Medicare Risk Adjustment and Hierarchical Condition Categories (HCC)</td>
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<td>MA 21F - Medicare MMP Reporting Requirements - IEHP DualChoice Cal MediConnect Plan (Medicare - Medicaid Plan)</td>
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<td>IPACode_CareCoordinator_Trng_2020</td>
<td>IPA Oversight / Year / Annual</td>
<td>California-Specific Reporting CA3.2 Organizational Structure &amp; Staffing</td>
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<td>As required for Precontractual Assessment and Annual DOA</td>
<td>MA 13G - Delegation Oversight Audit</td>
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</table>
**Instructions:** Submit a monthly report of all Individualized Care Plan (ICP) activities completed in the reporting month. Only include Individualized Care Plans that were developed with Member (or Authorized Representative) participation. Send records that are new or have an update from a previous submission (e.g. updated date of care goal discussion). Refer to the data dictionary for specifics on what each field should contain. Do not alter the templates in any way (e.g. adding or deleting columns or header rows). Always submit the most current template in Excel (.xlsx) format.

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<td>First name of the Member</td>
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<td>B</td>
<td>Member Last Name</td>
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<td>Last name of the Member</td>
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<td>IEHP Member ID #</td>
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<td>Cardholder identifier used to identify the beneficiary. This is assigned by IEHP and is 14 digits long.</td>
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<td>DOB</td>
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<td>Member's Date of Birth</td>
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<td>Date of Interdisciplinary Care Team Case Conference / Collaboration</td>
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DELEGATED IPA DELEGATION AGREEMENT – IEHP DUALCHOICE

The purpose of the following grid is to specify the activities delegated by Inland Empire Health Plan (IEHP) under the Delegation Agreement with respect to: (i) Quality Management and Improvement, (ii) Continuity and Coordination of Care, (iii) Utilization Management, (iv) Care Management, (v) Credentialing and Recredentialing, (vi) Encounter Data, (vii) Claims Adjudication and (viii) Compliance. All Delegated activities are to be performed in accordance with currently applicable NCQA accreditation standards, DHCS regulatory requirements, DMHC regulatory requirements, and IEHP standards, as modified from time to time. Delegate agrees to be accountable for all responsibilities delegated by IEHP and oversight of any sub-delegated activities, except as outlined in the Delegation Agreement. Delegate will submit the reports to IEHP as described in the Required Reporting Elements of the Delegation Agreement to the Delegation Oversight Department through IEHP Secure File Transfer Protocol (SFTP) by no later than the due date specified. The IPA will provide notice of report submission via email to the Provider Services designated contacts. IEHP will oversee the delegate by performing annual audits. In the event deficiencies are identified through this oversight, Delegate will provide a specific corrective action plan acceptable to IEHP. If Delegate does not comply with the corrective action plan within the specified time frame, IEHP will take necessary steps up to and including revocation of delegation in whole or in part. Delegate is free to collect data as needed to perform delegated activities. IEHP will provide Member experience and clinical performance data, upon request.

In accordance, the Health Insurance Portability and Accountability Act, IPA/Medical group shall comply with the following provisions:

- The IPA has a list of the allowed uses of protected health information. The IPA may only use PHI associated with performing functions outlined in this agreement. It may only be disclosed to the member, their authorized representative, IEHP, and other authorized healthcare entities.
- The IPA has a process in place for ensuring that Members and Practitioners information will remain protected. Protections must include oral, written, and electronic forms of PHI.
- The IPA has a description of the safeguarding of the protected health information from inappropriate use or further disclosure.
- The IPA has a written description stipulating that the IPA will ensure that sub-delegates have similar safeguards when applicable.
- The IPA has a written description stipulating that the delegate will provide individuals with access to their protected health information. The delegate will have procedures to receive, analyze and resolve Members’ requests for access to their PHI.
- The IPA will ensure that its organization will inform the organization if inappropriate uses of information occur. The IPA will have policies and procedures to identify and report unauthorized access, use, disclosure, modification or destruction of PHI and the systems used to access or store PHI.
- The IPA will ensure that the protected health information is returned, destroyed or protected if the delegation agreement ends.
### REQUIRED REPORTING ELEMENTS

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<td>Semi Annual UM Workplan Update</td>
<td>Aug 15</td>
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<tr>
<td></td>
<td>Annual UM Program Description</td>
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<td></td>
<td>Annual UM Workplan/Initial ICE Report</td>
<td>Feb 28</td>
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<td></td>
<td>Annual UM Program Evaluation</td>
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</tbody>
</table>
## REQUIRED REPORTING ELEMENTS

<table>
<thead>
<tr>
<th>Department</th>
<th>Required Documentation/Materials</th>
<th>Submission Deadline</th>
<th>IEHP Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Care</td>
<td>Monthly CM Log and Files&lt;br&gt;Monthly Care Transition Cases Log&lt;br&gt;Quarterly Care Coordinator to Member Ratio Report</td>
<td>15th of each month&lt;br&gt;May 15&lt;br&gt;Aug 15&lt;br&gt;Nov 15&lt;br&gt;Feb 15</td>
<td>SFTP Server</td>
</tr>
<tr>
<td>HCl</td>
<td>Annual HCC WorkPlan&lt;br&gt;MMP Provider Payment Requests (M_Claims) Record Layout/Universe</td>
<td>Feb 15&lt;br&gt;15th of each month</td>
<td>SFTP Server</td>
</tr>
<tr>
<td>Credentialing and Recredentialing</td>
<td>Written and approved Credentialing, Recredentialing, Peer Review policies and Procedures</td>
<td>As required for precontractual and annual DOA</td>
<td>SFTP server and email to <a href="mailto:CredentialingProfileSubmission@iehp.org">CredentialingProfileSubmission@iehp.org</a></td>
</tr>
<tr>
<td>Credentialing and Recredentialing</td>
<td>Initial credentialing applications for approved providers must be submitted to IEHP, by submitting a current profile, contract (1st and signature pages and any applicable addendums) and W-9.</td>
<td>After Credentialing Approval</td>
<td>SFTP Server and email to <a href="mailto:CredentialingProfileSubmission@iehp.org">CredentialingProfileSubmission@iehp.org</a></td>
</tr>
<tr>
<td>Credentialing and Recredentialing</td>
<td>Recredentialing applications for approved providers must be submitted to IEHP via IEHP Excel Recred Template identified in the IEHP Provider Manual, 05B – Practitioner Credentialing Requirements.</td>
<td>30 days following 1st of the following month, after Credentialing Committee approval</td>
<td>SFTP Server and email to <a href="mailto:CredentialingProfileSubmission@iehp.org">CredentialingProfileSubmission@iehp.org</a></td>
</tr>
<tr>
<td>Encounter Data</td>
<td>5010 / Encounters</td>
<td>1st of each month</td>
<td>SFTP Server</td>
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<tr>
<td>Claims Adjudication</td>
<td>Monthly Claims Timeliness Reports</td>
<td>15th of each month</td>
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<tr>
<td></td>
<td>Quarterl Provider Payment Dispute Resolution</td>
<td>April 30</td>
<td>SFTP Server</td>
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<td>July 31</td>
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<td>October 31</td>
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<td>January 31</td>
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<tr>
<td>Compliance</td>
<td>Annual Compliance FWA/HIPAA Training</td>
<td>Annually as required for DOA</td>
<td>SFTP Server</td>
</tr>
<tr>
<td>Compliance</td>
<td>Annual Sanction and Exclusions Screenings</td>
<td>Annually as required for DOA</td>
<td>SFTP Server</td>
</tr>
<tr>
<td>Compliance</td>
<td>Annual Compliance Plan Program Description and evidence of training</td>
<td>Annually as required for DOA</td>
<td>SFTP Server</td>
</tr>
<tr>
<td>Compliance</td>
<td>Annual FWA Program Description and evidence of training</td>
<td>Annually as required for DOA</td>
<td>SFTP Server</td>
</tr>
<tr>
<td>Compliance</td>
<td>Annual HIPAA Program Description and evidence of training</td>
<td>Annually as required for DOA</td>
<td>SFTP Server</td>
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<tbody>
<tr>
<td>Quality Improvement Program Structure (NCQA QI1 Elements A, B, C and D, NCQA MED8 Element D and MA Manual Ch. 5 Section 20)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA has the QI infrastructure necessary to improve the quality and safety of clinical care and services it provides to its members A. The QI program description specifies: 1. The QI program structure a. The QI program’s functional areas and their responsibilities. b. Reporting relationships of QI Department staff and the QI Committee. c. Resources and analytical support. d. QI activities. e. Collaborative QI activities, if any. 2. Involvement of a designated physician in the QI program. 3. Oversight of QI functions of the organization by the QI Committee. 4. Objectives for serving a culturally and linguistically diverse membership to: a. Reduce health care disparities in clinical areas. b. Improve cultural competency in materials and communications. c. Improve network adequacy to meet the needs of underserved groups.</td>
<td>Semi-Annual and Annual</td>
<td>IPA is not delegated for this function, however IEHP will review the IPA’s Policies and Procedures. Semi-Annual review and Annually as part of the DOA</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
</tr>
<tr>
<td>Quality Improvement Program Structure (NCQA QI1 Elements A, B, C and D, NCQA MED8 Element D and MA Manual Ch. 5 Section 20 (continued))</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>B. A QI annual work plan that reflects ongoing activities throughout the year and addresses: 1. Yearly planned QI activities and objectives that address: a. Quality of clinical care. b. Safety of clinical care. c. Quality of service. d. Members’ experience. 2. Time frame for each activity’s completion. 3. Staff members responsible for each activity. 4. Monitoring of previously identified issues. 5. Evaluation of the QI program.</td>
<td>Semi-Annual and Annual</td>
<td>IPA is not delegated for this function, however IEHP will review the IPA’s Policies and Procedures. Semi-Annual review and Annually as part of the DOA</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>3. Ensures practitioner participation in the QI program through planning, design, implementation or review. 4. Identifies needed actions. 5. Ensures follow-up, as appropriate. D. The organization annually makes information about its QI program available to members.</td>
<td>Semi-Annual and Annual</td>
<td>IPA is not delegated for this function, however IEHP will review the IPA’s Policies and Procedures. Semi-Annual review and Annually as part of the DOA</td>
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| Continuity and Coordination of Medical Care and Continued Access to Care (NCQA Q13 Element D and NET4 Elements A and B) | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | The IPA helps with members’ transition to other care when their benefit ends, if necessary.  

The IPA uses information at its disposal to facilitate continuity and coordination of medical care across its delivery system.  
A. The IPA notifies members affected by the termination of a practitioner, family or internal medicine or pediatrics, at least thirty (30) calendar days prior to the effective termination date and helps them select a new practitioner.  
B. If the practitioner’s contract is discontinued, the IPA allows affected members continued access to the practitioner, as follows:  
1. Continuation of treatment through the current period of active treatment, or for up to ninety (90) calendar days, whichever is less, for members undergoing active treatment for a chronic or acute medical condition  

## ATTACHMENT III: DELINEATION OF UTILIZATION MANAGEMENT
### Utilization Management Program Structure and Process

(NCQA UM1 and MA Manual Ch.5)

IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.

The IPA has a well-structured UM program and makes utilization decisions affecting the health care of members in a fair, impartial and consistent manner.

A. The IPA UM program description includes the following:

1. A written description of the program structure:
   - a) UM Staff member’s assigned activities.
   - b) UM staff who have the authority to deny coverage.
   - c) Involvement of a designated physician
   - d) The process for evaluating, approving and revising the UM program, and the staff responsible for each step
   - e) The UM program’s role in the QI program, including how the organization collects UM information and uses it for QI activities.
   - f) The organization’s process for handling appeals and making appeal determinations.

2. Involvement of a designated senior-level physician in UM program implementation

3. The program scope and process used to determine benefit coverage and medical necessity including:
   - a) How the organization develops and selects criteria
   - b) How the organization reviews, updates and modifies criteria

4. Information sources used to determine benefit coverage and medical necessity.

B. The IPA annually evaluates and updates the UM Program, as necessary.

<p>| Utilization Management Program | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | The IPA has a well-structured UM program and makes utilization decisions affecting the health care of members in a fair, impartial and consistent manner. A. The IPA UM program description includes the following: 1. A written description of the program structure: a) UM Staff member’s assigned activities. b) UM staff who have the authority to deny coverage. c) Involvement of a designated physician d) The process for evaluating, approving and revising the UM program, and the staff responsible for each step e) The UM program’s role in the QI program, including how the organization collects UM information and uses it for QI activities. f) The organization’s process for handling appeals and making appeal determinations. 2. Involvement of a designated senior-level physician in UM program implementation 3. The program scope and process used to determine benefit coverage and medical necessity including: a) How the organization develops and selects criteria b) How the organization reviews, updates and modifies criteria 4. Information sources used to determine benefit coverage and medical necessity. B. The IPA annually evaluates and updates the UM Program, as necessary. | Semi-Annual and Annually. | Annual audit of IPA Policies and Procedures, Workplan, Program, and Committee Meetings | See Corrective Action Plan (CAP) Requirements in MA_25D3. |</p>
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<tr>
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<tbody>
<tr>
<td>Structure and Process (NCQA UM1 and MA Manual Ch.5 (continued))</td>
<td>Procedures via IEHP Provider Manual.</td>
<td>C. Must meet applicable IEHP Standards and are consistent with NCQA, State and Federal Health Care Regulatory Agencies Standards.</td>
<td></td>
<td>Program, and Committee Meetings</td>
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</tr>
<tr>
<td>Clinical Criteria for UM Decisions – Approve or Denial (NCQA UM2 Elements A and C)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA applies objective and evidence-based criteria and takes individual circumstances and the local delivery system into account when determining the health appropriateness of health care services. A. The IPA: 1. Has written UM decision-making criteria that are objective and based on health evidence. 2. Has written policies for applying the criteria based on individual needs; considers at least the following individual characteristics when applying criteria”</td>
<td>Monthly UM Logs</td>
<td>Annual Audit of IPA Policies and Procedures, Workplan, Program, and Committee Meetings. Monthly log and random denial file selection review.</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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</tbody>
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<td></td>
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<td>b. Comorbidities.</td>
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<td>c. Complications.</td>
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<td>e. Psychosocial situation.</td>
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<td>f. Home environment, when applicable.</td>
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<td>3. Has written policies for applying the criteria based on an assessment of the local delivery system.</td>
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<td>4. Involves appropriate practitioners and in consultation with contracting health care professionals in developing.</td>
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<td>5. Annually reviews the UM criteria and the procedures for applying them and updates the criteria when appropriate.</td>
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<td>B. The IPA:</td>
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<td></td>
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<td>1. States in writing how practitioners and Members can obtain UM criteria.</td>
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<td>2. Makes the UM criteria available to its practitioners and Members upon request.</td>
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<td>C. At least annually, the IPA:</td>
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<td>1. Evaluates the consistency with which health care professionals involved in UM apply criteria in decision-making.</td>
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<td>2. Acts on opportunities to improve consistency, if applicable.</td>
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<td>3.</td>
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<td>Monthly log and random denial file selection review.</td>
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<tr>
<td>Communication Services (NCQA UM 3 Element A)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Members and practitioners can access staff to discuss UM issues. A. The IPA provides the following communication services for members and practitioners. 1. Staff are available at least eight (8) hours a day during normal business hours for inbound collect or toll-free calls regarding UM issues. 2. Staff can receive inbound communication regarding UM issues after normal business hours. a. Telephone b. Email c. Fax 3. Staff are identified by name, title and organization name when initiating or returning calls regarding UM issues. 4. TDD/TTY services for members who need them 5. The IPA refers members to IEHP who need language assistance to discuss UM issues.</td>
<td>N/A</td>
<td>Annual Audit of IPA Policies and Procedures and Annual Appointment Availability and Access Study Survey</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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| Appropriate Professionals (NCQA UM4 Elements A, B, C*and F, MED9 Element D, MA Manual Chapter 5, 6, and 11) | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | UM decisions are made by qualified health professionals.  
A. The IPA has written procedures:  
   1. Requiring appropriately licensed professionals to supervise all medical necessity decisions  
   2. Specifying the type of personnel responsible for each level of UM decision-making.  
B. The IPA has a written job description with qualifications for practitioners who review denials for care based on medical necessity. Practitioners are required to have:  
   1. Education, training or professional experience in medical or clinical practice  
   2. A current license to practice without restriction.  
C. The IPA ensures that a practitioner, as appropriate, reviews any denial based on medical necessity*.  
F. Use Board-Certified Consultants  
   1. The IPA has written procedures for using board-certified consultants to assist in making medical necessity determinations  
   2. The IPA provides evidence that it uses board-certified consultants for medical necessity determinations.  
D. The IPA distributes a statement to all members, treating practitioners, the organization’s | Monthly UM Logs | Annual audit of IPA Policies and Procedures, Workplan, Program, Committee Meetings and Ownership and Control documentation. | Monthly log and random denial and approval file selection review.  
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| Appropriate Professionals (NCQA UM4 Elements A, B, C*and F, MED9 Element D, MA Manual Chapter 5, 6, and 11 (continued)) | for Policies and Procedures via IEHP Provider Manual | reviewing practitioners and staff involved in UM decisions, affirming the following:  
1. UM decision making is based only on appropriateness of care and service and existence of coverage.  
2. The IPA does not specifically reward the organization’s reviewing practitioners or other individuals for issuing denials of coverage.  

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| Timeliness of UM Decisions (NCQA UM5 Element A* and 42 CFR 422.568 and 42 CFR 422.572) | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | The IPA makes utilization decisions in a timely manner to minimize any disruption in the provision of health care.  
A. The IPA adheres to the following time frames for notification and adjudication of the referral as follows*:  
1. Urgent Concurrent Decisions:  
The IPA gives electronic or written notification of the decision to practitioners and members within twenty-four (24) hours of the request.  
2. Urgent Pre-Service Decisions:  
The IPA makes decisions within seventy-two (72) hours from receipt of the request.  
3. Non-Urgent Pre-Service Decisions:  
The IPA makes decisions within fourteen (14) calendar days from receipt of the request.  
4. Post-Service Decisions:  
The IPA gives electronic or written notification of the decision to practitioners and members and written notification to the member within thirty (30) calendar days of the request. | Monthly | Annual audit of IPA Policies and Procedures, Workplan, Program, and Committee Meetings. | Monthly log and random denial and approval file selection review. |

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<td>Clinical Information (NCQA UM6 Element A)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA uses all information relevant to a member’s care when it makes coverage decisions A. There is documentation that the organization gathers relevant clinical information consistently to support nonbehavioral healthcare UM decision making.</td>
<td>Monthly</td>
<td>Annual audit of IPA Policies and Procedures, Workplan, Program, and Committee Meetings.</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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| Denial Notices (NCQA UM7 Elements A*, B*, and C*) | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | Members and practitioners receive enough information to help them understand a decision to deny care or coverage and to decide whether to appeal the decision.  
A. The IPA gives practitioners the opportunity to discuss nonbehavioral healthcare UM denial decisions with a physician or other appropriate reviewer*.  
B. The IPA’s written notification of nonbehavioral healthcare denials, provided to members and their treating practitioners, contains the following information*:  
1. The specific reasons for the denial, in easily understandable language.  
2. A reference to the benefit provision, guideline, protocol or other similar criterion on which the denial decision is based.  
3. A statement that members can obtain a copy of the actual benefit provision, guideline, protocol or other similar criterion on which the denial decision was based, upon request.  
C. The IPA’s written nonbehavioral healthcare denial notification to members and their treating practitioners contains the following information*:  
1. A description of appeal rights, including the right to submit written comments, documents or other information relevant to the appeal.  
2. An explanation of the appeal process, including members’ rights to representation and appeal time frames.  
a. Includes a statement that members may be represented by anyone they choose, including an attorney. | Monthly | Monthly log and random denial file review and Annual DOA | See Corrective Action Plan (CAP) Requirements in MA_25D3. |
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| Denial Notices (NCQA UM7 Elements A*, B*, and C*) | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | b. Provides contact information for the state Office of Health Insurance Consumer Assistance or ombudsperson, if applicable.  
c. States the time frame for filing an appeal.  
d. States the organization’s time frame for deciding the appeal.  
e. States the procedure for filing an appeal, including where to direct the appeal and information to include in the appeal.  
3. A description of the expedited appeal process for urgent preservice or urgent concurrent denials.  
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<td>Emergency Services (NCQA MED9 Element C)</td>
<td>1. To screen and stabilize the member without prior approval, where a prudent layperson, acting reasonably, would have believed that an emergency medical condition existed. 2. If an authorized representative, acting for the organization, authorized the provision of emergency services. 3. To provide post-stabilization care services for the member.</td>
<td>Assembly Bill 12 (AB 12) states that there must be a written process to obtain Second Opinion from PCP and Specialist. 1. The IPA allows for a second opinion consultation, when a Member has questions/concerns regarding a diagnosis or plan of treatment, with an appropriately qualified health care provider if requested by the Member, or a health care provider who is treating the Member. The second opinion shall be with one of the IPA’s contracted Providers, unless the IPA does not have the appropriately qualified health care provider in-network. In the event that the services cannot be provided in-network, the IPA must arrange for second opinion out-of-network with the same or equivalent Provider seen in-network.</td>
<td>Monthly</td>
<td>Monthly review of Second Opinion Logs and Annual Audit of IPA Policies and Procedures</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
</tr>
<tr>
<td>Second Opinions AB 12</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
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* MUST PASS Element
### ATTACHMENT I: DELINEATION OF QUALITY MANAGEMENT & IMPROVEMENT

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<tr>
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## ATTACHMENT IV: DELINEATION OF CARE MANAGEMENT

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</table>
| Guidelines for Care Management | IEHP will provide IPA with guidelines for Policies and Procedures, and guidelines for Care Management Training via IEHP Provider Manual. | The IPA must develop and implement a guidelines for Care Management that provides the structure for care management processes and systems that will enable them to provide coordinated care for special needs individuals. The Guidelines for Care Management must include the following elements:  
  - Description of Target Population  
  - Care Management for the Most Vulnerable Subpopulations  
  - Staff structure and Care Management Roles  
  - Use of Health Risk Assessment Tool (HRAT) (Provided by Health Plan)  
  - Development and essential components of Individualized Care Plan (ICP)  
  - Interdisciplinary Care Team (ICT)  
  - Care Transition Protocols  
  - Provider Network having Specialized Expertise and Use of Clinical Practice Guidelines and Protocols  
  - Guidelines for Care Management Training for Personnel and Provider Network  
  - Guidelines for Care Management Quality Performance Improvement Plan  
  - Measurable Goals and Health Outcomes  
  - Measuring Patient Experience of Care (Member Satisfaction)  
  - Ongoing Performance Improvement Evaluation; and  
  - Dissemination of Quality Improvement Performance | Annually | IPA must demonstrate guidelines for Care Management trainings are conducted annually for personnel and provider network. Submission of documents for training include:  
  - Guidelines for Care Management presentation  

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| CM 1: Care Management | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | IPAs must submit a monthly care management log that includes the following:  
1. Member name (First, Last)  
2. Member ID number  
3. Date of Birth  
4. Case Status (Open or Closed)  
5. Case Level  
6. Case Open Date  
7. Name of Care Coordinator  
8. Date ICP Created  
9. Date ICP Updated  
10. Date ICP sent to PCP  
11. Date Care Goals Discussed with Member  
12. Last Date of Member Contract  
|                     |                       | IPAs must submit a monthly care plan outreach log that includes the following:  
1. Member name (First, Last)  
2. Member ID number  
3. Date of Birth  
4. Date of Outreach Attempt  
5. Outreach Method  
6. Outreach Disposition  
7. Care Team Member Title  

Members who remain in Care Management for consecutive months must have an activity update each month.

(Sources: Medicare CM Log V2.0 and Att 12-CM Outreach Log V1.0)

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<tr>
<td>Care Management</td>
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<td>Care Management Program Description that uses Evidence used to develop the program, Criteria for identifying patients who are eligible for the program, Services offered to individuals, Defined program goals, and How case management services are integrated with the services of others involved in the member’s care.</td>
<td>Monthly</td>
<td>Annual Audit of IPA Policies and Procedures. Monthly CM log review and random case file review.</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
</tr>
<tr>
<td>Complex Case Management (NCQA PHM5)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Annually assess the characteristics and needs of its member population and relevant subpopulations, Reviews and updates its care management processes to address Member needs, and Reviews and updates its care management resources to address member needs.</td>
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<td>Initial Assessment of their health status, including condition-specific issues; Documentation of their clinical history, including medications; Activities of daily living; Mental health status and cognitive functions; Evaluation of their cultural and linguistic needs, preferences or limitations; Evaluation of visual and hearing needs, preferences or limitations; Evaluation of their caregiver resources and involvement; Evaluation of their socio-economic status; Evaluation of their available benefits.</td>
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| Care Management                           | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. |  - Development of a care management plan, including prioritized goals that consider the member’s and caregivers’ goals, preferences and desired level of involvement in the care management plan; identification of barriers to meeting their goals or complying with the plan; Development of a schedule for follow-up and communication; Development and communication of their self-management plans; A process to assess their progress against care management plans.  
  - Satisfaction with the care management program by obtaining feedback from members and analyzing member complaints and inquiries.  
  - Annually measures the effectiveness of its care management program by using three (3) measures to identify a relevant process or outcome; uses valid methods that provide quantitative results; Sets a performance goal; Clearly identifies measure specifications; Analyzes results; Identifies opportunities for improvement; Implements at least one intervention for each of the three (3) opportunities identified and develops a plan for evaluation of the intervention and re-measurement. | Monthly                | Annual Audit of IPA Policies and Procedures.  
| Complex Case Management (NCQA PHM5)       |                                                                                        |                                                                                                                                                                                                                           |                        |                                             |                                                               |
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| Care Management    | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | The IPA makes a special effort to coordinate care when members move from one setting to another, such as when they are discharged from a hospital.  
- The IPA facilitates safe transitions by identifying transitions, sharing the sending setting’s care plan with the receiving setting within one business day of notification of the transition, and notifying the patient’s usual practitioner of the transition within twenty-four (24) hours.  
- The IPA facilitates safe transitions by communicating with the members or responsible party about the care transition process, about the changes to the health status and plan of care within three business days, and provides a consistent person or unit within the organization who is responsible for supporting the member through transitions.  
- The IPA annually analyzes its performance on the entire process of managing all care transitions.  
- The IPA identifies unplanned transitions by reviewing hospital admissions within one business day of admission reports and long-term care facilities within one business day of admission reports.  
- The IPA minimizes unplanned transitions and works to maintain members in the least restrictive | Monthly | Annual Audit of IPA Policies and Procedures. | Monthly CM log review and random file review. |

The IPA makes a special effort to coordinate care when members move from one setting to another, such as when they are discharged from a hospital.
- The IPA facilitates safe transitions by identifying transitions, sharing the sending setting’s care plan with the receiving setting within one business day of notification of the transition, and notifying the patient’s usual practitioner of the transition within twenty-four (24) hours.
- The IPA facilitates safe transitions by communicating with the members or responsible party about the care transition process, about the changes to the health status and plan of care within three business days, and provides a consistent person or unit within the organization who is responsible for supporting the member through transitions.
- The IPA annually analyzes its performance on the entire process of managing all care transitions.
- The IPA identifies unplanned transitions by reviewing hospital admissions within one business day of admission reports and long-term care facilities within one business day of admission reports.
- The IPA minimizes unplanned transitions and works to maintain members in the least restrictive

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<tr>
<td>Care Management</td>
<td></td>
<td>setting possible by analyzing data at least monthly and analyzing rates at least annually of all member admissions to hospitals and ED visits to identify areas for improvement. The IPA also implements at least one intervention related to the opportunities identified during the analysis of all member admissions to hospitals and ED visits. Based on the findings from its monthly analysis of data to identify individual members at risk of a transition, the IPA works to reduce unplanned transitions and to maintain members in the least restrictive setting possible by coordinating services for members at high risk of having a transition and educating members or responsible parties about transitions and how to prevent unplanned transitions.</td>
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<tr>
<td>Care Transitions</td>
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## ATTACHMENT V: DELINEATION OF CREDENTIALING and REcredentialing

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<tr>
<td>Practitioner Credentialing Guidelines (NCQA CR1 Element A)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate has policies and procedures that specify: 1. Types of practitioners it credentials and recredentials 2. The verification sources it uses 3. The criteria for credentialing and recredentialing 4. The process for making credentialing and recredentialing decisions 5. The process for managing credentialing files that meet the organization’s established criteria 6. The process for requiring that credentialing and recredentialing are conducted in a nondiscriminatory manner 7. The process for notifying practitioners if information obtained during the organization’s credentialing process varies substantially from the information they provided to the organization.</td>
<td>Annually, at minimum</td>
<td>Annual Audit of Delegate’s Policies and Procedures.</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<td></td>
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<td>9. The Medical Director or other designated physician’s direct responsibility and participation in the credentialing program.</td>
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<tr>
<td></td>
<td></td>
<td>10. The process for securing the confidentiality of all information obtained in the credentialing process, except as otherwise provided by law.</td>
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<td></td>
<td></td>
<td>11. The process for confirming listings in practitioner directories and other materials for members are consistent with credentialing data, including education, training, board certification and specialty.</td>
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</table>
| Practitioner Rights (NCQA CR1 Element B) | IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual. | Delegate notifies practitioners about their right to:  
1. Review information submitted to support their credentialing application  
2. Correct erroneous information  
## ATTACHMENT V: DELINEATION OF CREDENTIALING and RECREDENTIALING

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<td></td>
<td></td>
<td>1. How primary source verification information is received, dated and stored.</td>
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<td></td>
<td>2. How modified information is tracked and dated from its initial verification.</td>
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<td></td>
<td></td>
<td>3. Staff who are authorized to review, modify and delete information, and circumstances when modification or deletion is appropriate.</td>
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<td></td>
<td></td>
<td>4. The security controls in place to protect the information from unauthorized modification.</td>
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<td></td>
<td>5. How the organization audits the processes and procedures in factors 1-4.</td>
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| CMS/DHCS                                 | IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual. | Delegate’s recredentialing policies and procedures require information from quality improvement activities and member complaints in the recredentialing decision making process.  
| Performance Monitoring for Recredentialing (NCQA CR8 Element A) |                                                                                       |                                                                                           |                        |                                                                         |                                                              |
| CMS                                      | IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual. | Delegate has policies and procedures to ensure that it only contracts with physicians who have not opted out.  
(Source: Medicare Managed Care Manual; Chapter 6 § 60.2) | Annually, at minimum          | Annual Audit of Delegate’s Policies and Procedures.                        | See Corrective Action Plan (CAP) Requirements in MA_25D3.       |
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<tr>
<td>CMS</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate must have policies and procedures that prohibit employment or contracting with practitioners (or entities that employ or contract with such practitioners) that are excluded/sanctioned from participation (practitioners or entities found on OIG Report)</td>
<td>Annually, at minimum</td>
<td>Annual Audit of Delegate’s Policies and Procedures.</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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(Source: Medicare Managed Care Manual, Chapter 6 § 60.2)
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<td>NCQA</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate’s Credentialing Committee: 1. Uses participating practitioners to provide advice and expertise for credentialing decisions 2. Reviews credentials for practitioners who do not meet established thresholds 3. Ensures that files that meet established criteria, are reviewed and approved by a medical director or designated physician</td>
<td>Annually, at minimum</td>
<td>Audit of Delegate’s Policies and Procedures and Credentialing Committee Meeting Minutes</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<tr>
<td>Sanction Information (NCQA CR3 Element B*), (DHCS), (CMS)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>A. Delegate verifies that the following are within the prescribed time limits*:  1. A current and valid license to practice.  2. A valid DEA or CDS certificate, if applicable.  3. Education and training as specified in the explanation.  4. Board Certification status, if applicable.  5. Work history.  6. A history of professional liability claims that resulted in settlement or judgment paid on behalf of the practitioner.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews verification of credentials within a random sample of up to 30 initial credentialing files and 30 recredentialing files from the decision made during the look-back period</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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</table>
| Sanction Information (NCQA CR3 Element B*), (DHCS), (CMS) | IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual. | B. Delegate verifies the following sanction information for credentialing*:  
  1. State sanctions, restrictions on licensure or limitations on scope of practice.  
  2. Medicare and Medicaid sanctions  
     a. Medicare and Medicaid Sanctions, OIG must be the verification source  
     b. Medicaid Sanctions, the Medi-Cal Suspended and Ineligible List must be the verification source. | Annually, at minimum | IEHP reviews verification of credentials within a random sample of up to 30 initial credentialing files and 30 recredentialing files from the decision made during the look-back period | See Corrective Action Plan (CAP) Requirements in MA_25D3. |

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<td>Credentialing Application (NCQA CR3 Element C*)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>C. Delegate verifies that applications for credentialing include the following*:  1. Reasons for inability to perform the essential functions of the position.  2. Lack of present illegal drug use.  3. History of loss of license and felony convictions.  4. History of loss or limitations of privileges or disciplinary actions.  5. Current malpractice insurance coverage.  6. Current and signed attestation confirming the correctness and completeness of the application.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews application and attestation within a random sample of up to 30 initial credentialing files and 30 recredentialing files from the decision made during the look-back period</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<td>CMS/DMHC/DHCS</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate verifies the practitioner has privileges in good standing. Practitioner must indicate their current hospital affiliation or admitting privileges at a participating hospital. (Source: Medicare Managed Care Manual, Chapter 6 § 60.3; MMCD Policy Letter 02-03 and DMHC TAG 10/11)</td>
<td>Annually, at minimum</td>
<td>IEHP reviews verification of credentials within a random sample of up to 30 initial credentialing files and 30 recredentialing files from the decision made during the look-back period</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<td>CMS</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate monitors its credentialing files to ensure that it only contracts with practitioners who have not opted out. (Source: Medicare Managed Care Manual, Chapter 6 § 60.2)</td>
<td>Annually, at minimum</td>
<td>IEHP reviews verification of credentials within a random sample of up to 30 initial credentialing files and 30 recredentialing files from the decision made during the look-back period</td>
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<tr>
<td>CMS/DHCS</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual. Delegate includes information from quality improvement activities and member complaints in the recredentialing decision-making process.</td>
<td></td>
<td>Annually, at minimum</td>
<td>IEHP reviews verification of credentials within a random sample of up to 30 recredentialing files from the decision made during the look-back period</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<tr>
<td>Recredentialing Cycle Length (NCQA CR4 Element A*)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual. A. Delegate conducts timely recredentialing. The length of the recredentialing cycle is within the required 36-month time frame*.</td>
<td></td>
<td>Annually, at minimum</td>
<td>IEHP reviews verification of credentials within a random sample of up to 30 initial credentialing files and 30 recredentialing files from the decision made during the look-back period</td>
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| Performance Standards and Thresholds (NCQA MED3 Element A) | IEHP sets site performance standards and thresholds for:  
1. Accessibility equipment.  
2. Physical accessibility.  
3. Physical appearance.  
4. Adequacy of waiting and examining room space.  
5. Adequacy of medical/treatment medical record keeping. | Delegate is responsible for ensuring the providers are compliant with IEHP Facility Site Review and Medical Record Audits. | Not Applicable | Not Applicable | Not Applicable |

* MUST PASS Element
### Site Visits and Ongoing Monitoring (NCQA MED3 Element B)

IEHP implements appropriate interventions by:

1. Continually monitoring member complaints for all practitioner sites.
2. Conducting site visits of offices within 60 calendar days of determining that the complaint threshold was met.
3. Instituting actions to improve offices that do not meet thresholds.
4. Evaluating the effectiveness of the actions at least every six months, until deficient offices meet the thresholds.
5. Documenting follow-up visits for offices that had subsequent deficiencies.

Delegate is responsible for ensuring the providers are compliant with IEHP Facility Site Review and Medical Record Audits.

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<tr>
<td>Ongoing Monitoring and Interventions (NCQA CR5 Element A)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate develops and implements policies and procedures for ongoing monitoring of practitioner sanctions, complaints and quality issues between recredentialing cycles and takes appropriate action against practitioners when it identifies occurrences of poor quality by: 1. Collecting and reviewing Medicare and Medicaid sanctions. 2. Collecting and reviewing sanctions or limitations on licensure. 3. Collecting and reviewing complaints. 4. Collecting and reviewing information from identified adverse events. 5. Implementing appropriate interventions when it identifies instances of poor quality related to factor 1-4.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews the organization’s policies and procedures, monitoring reports, and documentation of interventions</td>
<td>Delegate provides immediate notification of all providers identified through ongoing monitoring to the health plan’s Credentialing Manager, with the delegate’s plan of action for the identified provider and date it was reviewed by their Credentialing/Peer Review Committee.</td>
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### ATTACHMENT V: DELINEATION OF CREDENTIALING and RECREDENTIALING

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<tr>
<td>CMS</td>
<td>IEHP[E1] will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate maintains a documented process for monitoring whether network physicians have opted out of participating in the Medicare Program. (Source: Medicare Managed Care Manual, Chapter 6 § 60.3)</td>
<td>Annually, at minimum</td>
<td>IEHP reviews the Delegate’s Policies and Procedures, Monitoring Reports, and Documentation of Interventions</td>
<td>Delegate provides immediate notification of all providers identified through ongoing monitoring to the health plan, with the Delegate’s plan of action for the identified provider. See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
</tr>
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## ATTACHMENT V: DELINEATION OF CREDENTIALING and REREDENTIALING

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<tr>
<td>DHCS &amp; NCQA CR5 Element A.– Monitoring Medi-Cal Suspended and Ineligible Provider Reports</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate verifies that their contracted providers have not been terminated as a Medi-Cal provider or have not been placed on the Suspended and Ineligible Provider List</td>
<td>Annually, at minimum</td>
<td>IEHP reviews the Delegate’s Policies and Procedures, Monitoring Reports, and Documentation of Interventions</td>
<td>IPA provides immediate notification of all providers identified through ongoing monitoring to the health plan, with the IPA’s plan of action for the identified provider.</td>
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(Source: Exhibit A: Attachment 4, Plan Contract)
## ATTACHMENT V: DELINEATION OF CREDENTIALING and RECREDENTIALING

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<tbody>
<tr>
<td>CMS Monitoring Preclusions List</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual. IEHP will provide Delegate with Preclusions List through the SFTP portal</td>
<td>Delegate maintains a documented process for monitoring providers and prescribers who are precluded from receiving payment for Medicare Advantage (MA) items and services or Part D drugs furnished or prescribed to Medicare Beneficiaries. Delegates are responsible for reviewing these reports within thirty (30) days of its release and notify IEHP of any providers identified, to include the delegate’s plan of action.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews the Delegate’s Policies and Procedures, Monitoring Reports, and Documentation of Interventions Delegate provides immediate notification of all providers identified through ongoing monitoring to the health plan, with the Delegate’s plan of action for the identified provider.</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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## ATTACHMENT V: DELINEATION OF CREDENTIALING and RECRECREDENTIALING

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<tr>
<td>CMS</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate is required to submit SSN for all new and existing providers to screen against the Death Master File.</td>
<td>Ongoing</td>
<td>Not Applicable</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Monitoring Death Master File</td>
<td>IEHP maintains a documented process for monitoring providers who are identified on the Death Master File</td>
<td>(Source: Department of Health Care Services (DHCS) All Plan Letter (APL) APL 17-019 supersedes APL 16-012, “Provider Credentialing/Recredentialing and Screening/Enrollment)</td>
<td>Ongoing</td>
<td>Not Applicable</td>
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<tr>
<td>Notification to Authorities and Practitioner Appeal Rights (NCQA CR6 Element A)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegates that have taken action against a practitioner for quality reasons reports the action to the appropriate authorities and offers the practitioner a formal appeal process.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews evidence that the organization reports to authorities and the health plan’s Credentialing Manager, Information may be de-identified for confidentiality purposes</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D 3.</td>
</tr>
<tr>
<td>Actions Against Practitioners (NCQA CR6 Element A)</td>
<td></td>
<td>A. Delegate has policies and procedures for:</td>
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<td></td>
<td>1. The range of actions available to the organization.</td>
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<td>2. Making the appeal process known to practitioners.</td>
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<td></td>
<td>IEHP reviews the organization’s policies and procedures.</td>
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<tr>
<td>CMS– Appeals Process for Termination/ Suspension</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate’s policies and procedures regarding suspension or termination of a participating physician require the organization to ensure that the majority of the hearing panel members are peers of the affected physician.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews the information sent to practitioners</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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1. (Source: Medicare Managed Care Manual, Chapter 6 § 60.4)
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<tr>
<td>Review and Approval of Providers (NCQA CR7 Element A)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate’s policy for assessing a health care delivery provider specifies that before it contracts with a provider, and for at least every 36 months thereafter, it: 1. Confirms that the provider is in good standing with state and federal regulatory bodies. 2. Confirms that the provider has been reviewed and approved by an accrediting body. 3. Conducts an onsite quality assessment if the provider is not accredited.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews Delegate’s policies and procedures</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D 3.</td>
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<td>Assessing Medical Providers (NCQA CR7 Element D)</td>
<td>1. IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate assesses contracted medical health care providers. Delegate maintains a checklist, spreadsheet or other record that it assessed providers against the requirements.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews evidence that the organization assessed the providers in NCQA CR7 Element A</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D 3.</td>
</tr>
<tr>
<td>Accreditation/Certification of Free-Standing Surgical Centers in California - CH &amp; SC (California Health and Safety Code § 1248.1)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The Delegate has documentation of assessment of free-standing surgical centers to ensure that if the organization is not accredited by an agency accepted by the State of California, the organization is certified to participate in the Medicare Program, in compliance with California Health and Safety Code § 1248.1</td>
<td>Annually, at minimum</td>
<td>IEHP reviews evidence that the organization assessed the providers in NCQA CR7.A.</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
</tr>
<tr>
<td>Written Delegation Agreement (NCQA CR8 Element A)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate remains responsible for credentialing and recredentialing its practitioners, even if its delegates all or part of these activities. The written delegation agreement: 1. Is mutually agreed upon. 2. Describes the delegated activities and the responsibilities of IEHP and the IPA. 3. Requires at least semiannual reporting of the delegate to IEHP. 4. Describes the process by IEHP evaluates the delegate’s performance. 5. Specifies that IEHP retains the right to approve, suspend and terminate individual practitioners, providers and sites, even if IEHP delegates decision making 6. Describes the remedies available to IEHP if the delegated entity does not fulfill its obligations, including revocation of the delegation agreement</td>
<td>Annually, at minimum IEHP reviews delegation agreements from up to four randomly selected delegates, or all delegates if the organization has fewer than four delegates.</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D 3.</td>
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<tr>
<td>Written Delegation Agreement (continued)</td>
<td></td>
<td>The Delegate retains the right to approve, suspend and terminate individual practitioners, providers and sites in situation where it has delegated decision making. This right is reflected in the delegation document</td>
<td>Annually, at minimum</td>
<td>IEHP reviews delegation agreements from up to four randomly selected delegates, or all delegates if the organization has fewer than four delegates</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<tr>
<td>(NCQA CR 8 Element A)</td>
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<tr>
<td>CMS</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>All Delegation agreements include a statement that Delegate’s must adhere to MA requirements.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews Delegation Agreements from up to four randomly selected delegates, or all delegates if the organization has fewer than four delegates</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<td>7. (Source: Medicare Managed Care Manual, Chapter 11 § 110.2)</td>
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<tr>
<td>Privacy and Confidentiality (NCQA MED4 Element A)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The organization adopts written policies and procedures that address: 1. Information included in notification of privacy practices. 2. Access to PHI. 3. The process for members to request restrictions on use and disclosure of PHI. 4. The process for members to request amendments to PHI. 5. The process for members to request an accounting of disclosures of PHI. 6. Internal protection of oral, written and electronic information across the organization.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews Delegation Agreements from up to four randomly selected delegates, or all delegates if the organization has fewer than four delegates</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<td>Review of Credentialing Activities (NCQA CR8 Element C)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>For delegation agreements in effect for 12 months or longer, the organization: 1. Annually reviews the Delegate’s credentialing policies and procedures. 2. Annually audits credentialing and recredentialing files against NCQA standards for each year that delegation has been in effect. 3. Annually evaluates the Delegate’s performance against NCQA standards for delegated activities. 4. Semi-annually evaluates regular reports</td>
<td>Annually, at minimum</td>
<td>IEHP reviews a sample of up to four randomly selected delegates, or all delegates if the organization has fewer than four delegates</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<td>Opportunities for Improvement (NCQA CR8 Element D)</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>For delegation arrangements that have been in effect for more than 12 months, at least once in each of the past 2 years, the organization identified and followed up on opportunities for improvement, if applicable.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews reports for opportunities for improvement if applicable and appropriate actions to resolve issues from up to or four randomly selected delegates, or all delegates if the organization has fewer than four delegates</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
</tr>
<tr>
<td>Identification of HIV/AIDS Specialists – Written Process</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>Delegate has a written policy and procedure describing the process that the organization identifies or reconfirms the appropriately qualified physician who meet the definition of an HIV/AIDS Specialist, according to California State regulations on an annual basis</td>
<td>N/A</td>
<td>IEHP reviews Delegate Policies and Procedures</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
</tr>
<tr>
<td>Evidence of Implementation</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>On an annual basis, Delegate identifies or reconfirms the appropriately qualified physician who meet the definition of an HIV/AIDS, specialist according to California State Regulations</td>
<td>Annually, at minimum</td>
<td>IEHP reviews evidence that the organization identified or reconfirmed the appropriate qualified physicians</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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<tr>
<td>Distribution of Findings</td>
<td>IEHP will provide Delegate with guidelines for Policies and Procedures via IEHP Provider P=Manual.</td>
<td>Delegate is to provide the list of identified qualifying physicians to the department responsible for authorizing standing referrals.</td>
<td>Annually, at minimum</td>
<td>IEHP reviews evidence that the organization provided the list of identified qualifying physicians to the department responsible for authorizing standing referrals.</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
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ATTACHMENT VI: DELINEATION OF ENCOUNTER DATA

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<tr>
<td>ENC 1: Encounter Data Reporting</td>
<td>The Delegate is required by DMHC, CMS and DHCS to submit Encounter Data for the effective management of IEHP health care delivery system. &lt;br&gt; A. Data must be submitted using the HIPAA compliant 5010 837 file format. &lt;br&gt; B. The Encounter Data must be complete and accurate. &lt;br&gt; C. Submit complete Encounter data within ninety (90) days after each month of service.</td>
<td>Submit Encounter Data within ninety (90) days after each month of service</td>
<td>Initial Onsite Assessment &lt;br&gt; Monthly assessment of encounter data submission rates</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D 3.</td>
<td>IEHP may withhold no more than one percent (1%) of the monthly Capitation Payment for failure to submit complete and accurate Encounter Data within ninety (90) days after each month of service.</td>
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<tr>
<td>Correct Claim Determination (CMS MA Manual Ch. 4 Section 10)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA must make correct claim determinations, which include developing the claim for additional information, when necessary, for: A. Services obtained from a non-contracting Provider when the services were authorized by the IPA. B. Ambulance services dispatched through 911 C. Emergency services D. Urgently needed services E. Post-stabilization care services F. Renal dialysis services that Medicare members obtain while temporarily out of the service area.</td>
<td>See Attachment IPA Reporting Requirements Schedule in Section 25</td>
<td>Initial Onsite Assessment Monthly Assessment Annual Oversight Assessment</td>
<td>May result in Request for Corrective Action (CAP) or Focused Audit as defined in MA_20D.</td>
</tr>
<tr>
<td>Reasonable Reimbursement for Covered Services (CMS MA Manual Ch. 4 Section 10)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA must provide reasonable reimbursement for: A. Services obtained from a non-contracting Provider when the services were authorized by the IPA B. Ambulance services dispatched through 911 C. Emergency services D. Urgently needed services E. Post-stabilization care services F. Renal dialysis services that Medicare members obtain while temporarily out of the service area</td>
<td>See Attachment IPA Reporting Requirements Schedule in Section 25</td>
<td>Initial Onsite Assessment Monthly Assessment Annual Oversight Assessment</td>
<td>May result in Request for Corrective Action (CAP) or Focused Audit as defined in MA_20D.</td>
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### ATTACHMENT VII: DELINEATION OF CLAIMS ADJUDICATION

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</table>
| Reasonable Reimbursement for Covered Services (CMS MA Manual Ch. 4 Section 10 (continued)) | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | G. Services for which coverage has been denied by the IPA but found to be services the member was entitled to upon appeal.  
H. IPA must use the appropriate fee-for-service payment mechanisms when determining amounts to pay non-contracted Providers. Note: if the IPA has negotiated lower amounts or if a Provider bills lower amounts than is possible under fee-for-service, paying non-contracted Providers these lower amounts is appropriate. | See Attachment IPA Reporting Requirements Schedule in Section 25 | Initial Onsite Assessment  
Monthly Assessment  
Annual Oversight Assessment | May result in Request for Corrective Action (CAP) or Focused Audit as defined in MA_20D. |
| Timely Payment of Non-Contracting Provider Clean Claims (CMS MA Manual Ch. 11 Section 100 and CMS MA Manual Ch. 13 Section 40) | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | The IPA must pay 95 percent of “clean” claims from non-contracting Providers within thirty (30) calendar days of the earliest receipt date. | See Attachment IPA Reporting Requirements Schedule in Section 25 | Initial Onsite Assessment  
Monthly Assessment  
Annual Oversight Assessment | May result in Request for Corrective Action (CAP) or Focused Audit as defined in MA_20D. |
| Interest on Clean Claims Paid Late (CMS MA Manual Ch. 11 Section 100) | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | If the IPA pays clean claims from non-contracting Providers in over thirty (30) calendar days, it must pay interest in accordance with 1816 (c)(2)(B) and 1842(c)(2)(B) | See Attachment IPA Reporting Requirements Schedule in Section 25 | Initial Onsite Assessment  
Monthly Assessment  
Annual Oversight Assessment | May result in Request for Corrective Action (CAP) or Focused Audit as defined in MA_20D. |
**ATTACHMENT VII: DELINEATION OF CLAIMS ADJUDICATION**

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<th>Corrective Actions if Delegate Fails to Meet Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timely Adjudication of Non-Clean Claims (CMS MA Manual Ch. 11 Section 100 and CMS MA Manual Ch. 13 Section 40)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA must pay all non-contracted claims that do not meet the definition of “clean claims” within sixty (60) calendar days of the earliest receipt date.</td>
<td>See Attachment IPA Reporting Requirements Schedule in Section 25</td>
<td>Initial Onsite Assessment Monthly Assessment Annual Oversight Assessment</td>
<td>May result in Request for Corrective Action (CAP) or Focused Audit as defined in MA_20D.</td>
</tr>
<tr>
<td>Claim Denials (Notice Content) (CMS MA Manual Ch. 13 Section 40)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>If an IPA denies payment resulting in Member liability, a written denial notice must be sent to the member. The written denial must clearly state the service denied and the specific denial reason. The notice must also inform the beneficiary of his or her right to a standard reconsideration and describe the appeal process.</td>
<td>See Attachment IPA Reporting Requirements Schedule in Section 25</td>
<td>Initial Onsite Assessment Monthly Assessment Annual Oversight Assessment</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_20D.</td>
</tr>
<tr>
<td>Medicare Secondary Payer (CMS MA Manual 4 Section 80)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA must have procedures to identify payers that are primary to Medicare, determine the amounts payable, and coordinate benefits. IPA must have written policies and procedures which ensure that claims involving coordination of benefits are identified and paid correctly.</td>
<td>See Attachment IPA Reporting Requirements Schedule in Section 25</td>
<td>Initial Onsite Assessment Monthly Assessment Annual Oversight Assessment</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_20D.</td>
</tr>
</tbody>
</table>
# ATTACHMENT VII: DELINEATION OF CLAIMS ADJUDICATION

<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>IEHP Responsibilities</th>
<th>Delegate Responsibilities</th>
<th>Frequency of Reporting</th>
<th>Process for Evaluating Delegates Performance</th>
<th>Corrective Actions if Delegate Fails to Meet Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submission Standards</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA must allow: A. Contracted Providers ninety (90) days to submit claims</td>
<td>See Attachment IPA Reporting Requirements Schedule in Section 25</td>
<td>Initial Onsite Assessment</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_20D.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>B. Non-contracted Providers three hundred and sixty-five (365) days to submit claims</td>
<td></td>
<td>Monthly Assessment</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>C. Claims denied for untimely submission to be considered for adjudication upon receipt of a Provider’s request for a redetermination and demonstration of good cause for delay.</td>
<td></td>
<td>Annual Oversight Assessment</td>
<td></td>
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</tr>
<tr>
<td>Misdirected Claims</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>95% of misdirected claims must be forwarded to the appropriate financially responsible entity within ten (10) calendar days.</td>
<td>See Attachment IPA Reporting Requirements Schedule in Section 25</td>
<td>Initial Onsite Assessment</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_20D.</td>
</tr>
</tbody>
</table>

* MUST PASS Element
## ATTACHMENT VII: DELINEATION OF CLAIMS ADJUDICATION

<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>IEHP Responsibilities</th>
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<th>Frequency of Reporting</th>
<th>Process for Evaluating Delegates Performance</th>
<th>Corrective Actions if Delegate Fails to Meet Responsibilities</th>
</tr>
</thead>
</table>
| Denials            | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | A. 100% of member payment denial notices are written and include the denied service and give a specific reason for the denial which is not confusing and/or misleading to the member.  
B. 100% of member denial notices for payment use the CMS approved format and language.  
C. 100% of provider denial determinations include a valid explanation on the remittance advice (RA) which includes language for non-participating providers stating to submit all appeals to IEHP.  
100% of all claim denials must be mailed to the member and/or Provider within 60 calendar days of the earliest receipt date. | See Attachment IPA Reporting Requirements Schedule in Section 25 | Initial Onsite Assessment  
Monthly Assessment  
| Overpayments       | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | 100% of requests for overpayments must:  
A. Clearly identify the claim, the name of the member, the date of service and a clear explanation of the basis upon which the payor believes the overpayment occurred.  
B. Be made following federal guidelines and no retractions can be made prior to forty-one (41) calendar days after the overpayment was identified.  
C. Not recover overpayments after December 31 of the 3rd calendar year in which the overpayment was identified. | See Attachment IPA Reporting Requirements Schedule in Section 25 | Initial Onsite Assessment  
Monthly Assessment  
# ATTACHMENT VII: DELINEATION OF CLAIMS ADJUDICATION

<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>IEHP Responsibilities</th>
<th>Delegate Responsibilities</th>
<th>Frequency of Reporting</th>
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<th>Corrective Actions if Delegate Fails to Meet Responsibilities</th>
</tr>
</thead>
</table>
| Contract Standards (CMS MA Manual Ch. 11 Section 100) | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | A. All written contracts with downstream entities and providers of service contain a prompt payment provision  
B. All written contracts with downstream entities and providers of service contain a provision that Medicare members are held harmless for payment. | See Attachment IPA Reporting Requirements Schedule in Section 25 | Initial Onsite Assessment  
Monthly Assessment  
| Provider Payment Disputes | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | A. Provider Payment Disputes must be filed within one hundred and twenty (120) calendar days after the notice of initial determination  
B. Provider Payment Disputes may be accepted after one hundred and twenty (120) calendar days if a written request for an extension of the timeframe is for good cause  
C. Provider Payment Disputes must be resolved with a valid determination, and written determination is sent to the Provider within thirty (30) calendar days  
D. Provider Payment disputes in which additional information is requested allows the provider fourteen (14) calendar days to respond | See Attachment IPA Reporting Requirements Schedule in Section 25 | Initial Onsite Assessment  
Monthly Assessment  
## ATTACHMENT VII: DELINEATION OF CLAIMS ADJUDICATION

<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>IEHP Responsibilities</th>
<th>Delegate Responsibilities</th>
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<th>Process for Evaluating Delegates Performance</th>
<th>Corrective Actions if Delegate Fails to Meet Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effectuation of Third-Party Claims Reconsideration Reversals (42 CFR 422.618)</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>If the IPA’s determination is reversed in whole or in part by the health plan, the IPA must pay for the service no later than fourteen (14) calendar days from the date it receives the notice reversing the organization determination. The IPA must also inform the health plan that the organization has effectuated the decision. If the IPA’s determination is reversed in whole or in part by an administrative law judge (ALJ), or at a higher level of appeal, the IPA must authorize or provide the service under dispute as expeditiously as the member’s health requires, but no later than sixty (60) calendar days from the date it received notice of the reversal.</td>
<td>See Attachment IPA Reporting Requirements Schedule in Section 25</td>
<td>Initial Onsite Assessment Monthly Assessment Annual Oversight Assessment</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
</tr>
</tbody>
</table>
## ATTACHMENT VIII: DELINEATION OF FRAUD, WASTE, AND ABUSE / HIPAA

<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>IEHP Responsibilities</th>
<th>Delegate Responsibilities</th>
<th>Frequency of Reporting</th>
<th>Process for Evaluating Delegates Performance</th>
<th>Corrective Actions if Delegate Fails to Meet Responsibilities</th>
</tr>
</thead>
</table>
| Compliance Program (CMS MA Manual Ch. 21) | IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual. | The Delegate has an Effective Compliance Program which includes the following structural components:  
A. Written Policies, Procedures and Standards of Conduct;  
B. Compliance Officer, Compliance Committee and High-Level Oversight;  
C. Effective Training and Education;  
D. Effective Lines of Communication;  
E. Well-Publicized Disciplinary Standards;  
F. Effective System for Routine Monitoring, Auditing and Identification of Compliance Risks; and  
G. Procedures and System for Prompt Response to Compliance Issues | Precontractual Assessment and Annually as part of the DOA | Initial Assessment  
Annual DOA | See Corrective Action Plan (CAP)  
Requirements in MA_25D3. |

* MUST PASS Element
| **Fraud, Waste and Abuse (42 CFR 423.504, Part D Manual Ch. 9, CMS MA Manual Ch. 11 Section 20)** | **IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.** | **The IPA has an Effective Fraud, Waste and Abuse program that is designed to deter, identify, investigate and resolve potentially fraudulent activities that may occur in daily operations, both internally and with contracted providers.**  
IPA provides monitoring and oversight, both internally and externally, of daily operational activities to detect and/or deter fraudulent behavior. Such activities include, but are not limited to:  
A. Provider grievances  
B. Claims activity  
C. Financial Statements  
D. Utilization management monitoring  
E. Chart audits  
F. Clinical Audits  
G. Internal auditing and monitoring process  
H. Risk assessment  
The IPA has a compliance training program for its provider network, and requires training internally and externally within ninety (90) days of initial hire/contracting, as updates/changes occur.  
The IPA has a process in place, where needed, for reporting suspected fraudulent behavior to appropriate federal, state, local authorities, and/or IEHP.  

| **Precontractual Assessment and Annually as part of the DOA** | **Initial Onsite Assessment Annual DOA** | **See Corrective Action Plan (CAP) Requirements in MA_25D3.**

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* MUST PASS Element

Revised Date: 01/01/2020
Page 65 of 66
### ATTACHMENT VIII: DELINEATION OF FRAUD, WASTE, AND ABUSE / HIPAA

<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>IEHP Responsibilities</th>
<th>Delegate Responsibilities</th>
<th>Frequency of Reporting</th>
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<th>Corrective Actions if Delegate Fails to Meet Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>HIPAA/Title 45 CFR; HITECH Act ARRA COMIA</td>
<td>IEHP will provide IPA with guidelines for Policies and Procedures via IEHP Provider Manual.</td>
<td>The IPA maintains policies and procedures required by HIPAA and ARRA. A. Uses and disclosures of PHI B. Member access to PHI and amendment/restriction process C. (CMS) Auditing/Monitoring of Business Associates, First Tier, Downstream and Related Entities D. Security of Facilities and Information Systems E. Record Retention F. Non-retaliation for exercising rights provided by the Privacy Rule. G. Reporting incidents of HIPAA non-compliance to IEHP A privacy officer has been designated by the IPA. There are appropriate administrative, technical and physical safeguards to prevent intentional or unintentional use or disclosure of PHI.</td>
<td>See Attachment IPA Reporting Requirements Schedule in Section 25</td>
<td>Initial Onsite Assessment Annual DOA</td>
<td>See Corrective Action Plan (CAP) Requirements in MA_25D3.</td>
</tr>
</tbody>
</table>
Listed below are the items required for your Delegation Oversight Audit (DOA). We have identified when they should be available, by Department.
All Desktop documents are due by the date specified in the Delegation Oversight Letter.

<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>DELEGATION OVERSIGHT</th>
</tr>
</thead>
<tbody>
<tr>
<td>✔</td>
<td>✔</td>
<td>Biographical Information</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>Sub-Contracted Service by Facility/Agency</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>All sections of the DOA tool documented with road mapping instructions for each element (see sample roadmap)</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>Organizational chart(s)</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>Current job descriptions as relevant to the audit</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>Delegation Agreements with any sub-delegated provider</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>Ownership and Control Documentation (submitted annually)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>QUALITY MANAGEMENT (Look back period of 07/2019 to 06/2020)</th>
</tr>
</thead>
<tbody>
<tr>
<td>✔</td>
<td>As Needed</td>
<td>Quality Improvement Committee meeting minutes from the auditing period that identify the following occurred during the meeting. (If unable to submit meeting minutes, please let us know and IEHP will go onsite to review)</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>- Recommendation of policy decisions</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>- Review and evaluation of QI activities</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>- Practitioner participation in the QI program through planning, design, implementation or review</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>- Identification and follow up of needed actions</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>Notification of Termination policy and evidence that members were notified of practitioner termination</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>Continued Access to Practitioners policy and evidence that the delegate followed policy requirements</td>
</tr>
<tr>
<td>✔</td>
<td>✔</td>
<td>Supportive documentation or materials such as studies, audits, and surveys completed during the reporting period</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>UTILIZATION MANAGEMENT (Look back period of 07/2019 to 06/2020)</th>
</tr>
</thead>
<tbody>
<tr>
<td>✔</td>
<td>✔</td>
<td>Program, Plan and Description (no submission required; report was submitted February 2020)</td>
</tr>
</tbody>
</table>
### Inland Empire Health Plan
### Delegation Oversight Audit Tool 2020
### Audit Preparation Instructions - Medicare

<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>UTILIZATION MANAGEMENT (Look back period of 07/2019 to 06/2020)</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td>✓</td>
<td>Annual Program Evaluation (no submission required; report was submitted February 2020)</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Policies and Procedures</td>
</tr>
<tr>
<td>✓ As Needed</td>
<td></td>
<td>Committee meeting minutes from last twelve (12) months for: (If unable to submit meeting minutes, please let us know and IEHP will go onsite to review)</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>- Board of Directors</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>- Utilization Management Committee</td>
</tr>
<tr>
<td>✓ As Needed</td>
<td></td>
<td>Subcommittee Meeting Minutes (If unable to submit meeting minutes, please let us know and IEHP will go onsite to review)</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Annual Inter-rater Reliability Audit (On-Site Review)</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Semi-Annual Health Plan Reports for the last twelve (12) months;</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Two (2) examples that demonstrate the use of Board Certified consultants to assist with determinations</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Criteria for Length of Stay and Medical Necessity used during the past two (2) years</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Fifteen (15) referral files to include Denials, Modifications, Cancellations and Approvals; (conducted via webinar)</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Utilization Management statistics from the last twelve (12) months;</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Evidence that the Affirmative Statement has been distributed to providers and employees who make UM decisions;</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Evidence, other than via a denial letter, that the providers have been notified that they may contact a physician reviewer to discuss denial decisions;</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Provider communications from last twelve (12) months</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Evidence of current license for Providers (MD/DO) and Employees (RN, LVN) who make UM Decisions</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Copies of most recent referral inventory reporting used to manage turnaround time requirements for processing of IEHP referrals.</td>
</tr>
<tr>
<td>✓</td>
<td></td>
<td>Copies of most recent mailroom policies</td>
</tr>
</tbody>
</table>
## Desktop On-Site

### CARE MANAGEMENT (Look back period of 07/2019 to 06/2020)

<table>
<thead>
<tr>
<th>Requirements</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Program Plan and Description and CM applicable policies and procedures if different from UM;</td>
<td></td>
</tr>
<tr>
<td>✓ Ten (10) CM files; (Conducted via webinar)</td>
<td></td>
</tr>
<tr>
<td>✓ (5) sample cases of Carve Out/ Waiver Programs (conducted via webinar)</td>
<td></td>
</tr>
<tr>
<td>✓ Five (5) sample cases with documentation of coordination of care with county mental health clinics for Member receiving specialty mental health services.</td>
<td></td>
</tr>
</tbody>
</table>

### CREDENTIALING (Look back period of 07/2019 to 06/2020)

<table>
<thead>
<tr>
<th>Requirements</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Credentialing Policies and Procedures</td>
<td></td>
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<tr>
<td>✓ Credentialing meeting minutes including date and voting attendees from the look back period, which may include, but not limited to, references from:</td>
<td></td>
</tr>
<tr>
<td>✓ - Quality Management Committee Minutes</td>
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<tr>
<td>✓ - Credentialing Committee Minutes</td>
<td></td>
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<tr>
<td>✓ - Peer Review Committee Minutes</td>
<td></td>
</tr>
<tr>
<td>✓ Delegate must submit a spreadsheet of all credentialed and recredentialied providers for the specified time period (Applicable to Kaiser &amp; ASH Specialty Network)</td>
<td></td>
</tr>
<tr>
<td>✓ (30) Credentialing files selected by the IEHP auditor will be provided and requested to be available in the order they are listed</td>
<td></td>
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<tr>
<td>✓ (30) Recredentialing files selected by the IEHP auditor will be provided and requested to be available in the order they are listed</td>
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<tr>
<td>✓ Evidence of Ongoing Monitoring of Sanctions</td>
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<td>✓ Practitioner files of those providers terminated for Quality Issues</td>
<td></td>
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<tr>
<td>✓ Practitioner files that have appealed a decision</td>
<td></td>
</tr>
<tr>
<td>✓ Delegate must submit a spreadsheet of all organizational providers. IEHP will select credentialing and recredentialing files and the delegate may provide their spreadsheet tracking mechanism or file for the file audit</td>
<td></td>
</tr>
<tr>
<td>✓ Delegation Agreements with any sub-delegated provider</td>
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<tr>
<td>✓ HIV/AIDS Annual Survey</td>
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<td>DESKTOP</td>
<td>ON-SITE</td>
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<td>outcomes. Include incidents that were received and/or closed during the audit period. Refer to tab <code>C. Universe_Privacy Incidents</code> of the Compliance tool for required template.</td>
</tr>
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</tr>
<tr>
<td>✔</td>
<td>Audit &amp; Monitoring Universe: Create a list of all audits and monitoring activities of the IPA’s delegated functions started or completed during the audit period. Refer to tab <code>D. Universe_A&amp;M Activities</code> of the Compliance tool for required template.</td>
</tr>
<tr>
<td>✔</td>
<td>Downstream Entity/Subcontractors Universe: Submit a list of all downstream entities/subcontractors contracted with the IPA anytime during the audit period, including contract start date, description of services/function performed, identify which entities participate in offshoring or are offshore. Refer to tab <code>E. Universe_FDR_Subcontractor</code> of the Compliance tool for required template.</td>
</tr>
<tr>
<td></td>
<td>A sample of 10 employees will be selected from the Employee Universe by the IEHP Auditor for which evidence of the following will be requested:</td>
</tr>
<tr>
<td></td>
<td>a. New Hire Screening of List of Excluded Individuals and Entities (LEIE), System for Award Management (SAM), and Medi-Cal Suspended &amp; Ineligible List (S&amp;I)</td>
</tr>
<tr>
<td></td>
<td>b. Monthly Screening performed of LEIE, SAM, and Medi-Cal S&amp;I for a sample of three consecutive months.</td>
</tr>
<tr>
<td></td>
<td>c. New hire confidentiality statement upon hire or start</td>
</tr>
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<td></td>
<td>d. Annual confidentiality statement</td>
</tr>
<tr>
<td></td>
<td>e. New hire Privacy &amp; Security training upon hire or start</td>
</tr>
<tr>
<td></td>
<td>f. Annual Privacy &amp; Security training</td>
</tr>
<tr>
<td></td>
<td>g. New Hire General Compliance training upon hire or start</td>
</tr>
<tr>
<td></td>
<td>h. Annual General Compliance training</td>
</tr>
<tr>
<td></td>
<td>i. New Hire FWA Training upon hire or start</td>
</tr>
<tr>
<td></td>
<td>j. Annual FWA training</td>
</tr>
<tr>
<td></td>
<td>k. New Hire distribution of Standards of Conduct upon hire or start</td>
</tr>
<tr>
<td></td>
<td>l. Annual distribution of Standards of Conduct.</td>
</tr>
<tr>
<td></td>
<td>Instructions</td>
</tr>
<tr>
<td>---</td>
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</tr>
</tbody>
</table>
| ✓ | **A sample of 5 audits and/or monitoring activities will be selected from the A&M Activities Universe. Evidence of the following will be required:**  
  a. Findings Reports  
  b. Findings were reported to an oversight body, senior leadership, and the board of directors  
  c. Corrective actions, if applicable. |
| ✓ | **A sample of 5 FWA investigations will be selected from the Reported Issues Universe. Evidence of the following will be required:**  
  a. Suspected FWA was promptly investigated  
  b. Suspected FWA was reported to IEHP with 10 days of becoming aware; and  
  c. Suspected FWA was reported to Regulatory Agencies within required timeframes. |
| ✓ | **A sample of 5 privacy investigations will be selected from the Privacy Incidents Universe. Evidence of the following will be required:**  
  a. Notice of Privacy Practices was sent to the Member;  
  b. Date incident was reported to the Privacy/Compliance Office/Officer;  
  c. Completion of a Risk Assessment for issue/investigation;  
  d. Notification was sent to IEHP with HIPAA BAA Requirements of discovery of a suspected breach; and  
  e. Corrective actions taken, if applicable. |
| ✓ | **A sample* of five (5) FDR/Subcontractors will be selected from the FDR_Subcontractor Universe. Evidence of the following will be required:**  
  a) Findings Reports;  
  b) Findings were reported to an oversight body, senior leadership, and the Board of Directors;  
  c) Corrective actions, if applicable; and  
  Evidence of Offshore Contracting Oversight. |
<table>
<thead>
<tr>
<th>DESKTOP</th>
<th>ON-SITE</th>
<th>PROVIDER DIRECTORY</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td></td>
<td>Report during the lookback period of the annual audit of identified/reported inaccuracies and the timeframe of the correction. (Applies to Kaiser Permanente and American Specialty Health (ASH))</td>
</tr>
</tbody>
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