



of South Central Wisconsin

Utilization Management 2020 Program Description



Group Health Cooperative of South Central Wisconsin has a structured UM Program that allows for fair, impartial and consistent utilization decisions affecting the health care of our members.

To keep the UM program current and appropriate, GHC-SCW annually evaluates:

- The program structure, scope, processes, and information sources used to determine benefit coverage and medical necessity.
- The level of involvement of the senior-level physician and designated behavioral healthcare practitioners.

GHC-SCW's Medical Directors for Medical and Behavioral Health provide direction and oversight for revising the UM program structure or processes based on the above assessments and evaluations.

Program Structure

GHC-SCW's UM Staff consists of the following individuals:

1. Behavioral Health Team
 - a. Medical Director of Behavioral Health (PsyD)
 - b. Director of BH & Medical Specialty Services (LCSW, ACSW)
 - c. Care Management Manager (RN, BSN, CCM)
 - d. Behavioral Health Utilization Management Social Workers
 - e. Case Managers – Social Workers
2. Medical Health Team
 - a. Medical Director of Care Management (MD, FMOB)
 - b. Physician Reviewers (MD)
 - c. Care Management Manager (RN, BSN, CCM)
 - d. Utilization Management RNs
 - e. Care Management Associates
 - f. Case Managers – RNs and Social Workers

UM Staff apply evidence-based criteria to requested services and approve when criteria have been met. In the event criteria is not met, UM Staff prepare case review for presentation at scheduled rounds which are conducted at least two and often three times weekly. UM staff presents cases to the Medical Director or Medical Director for Behavioral Health and/or Physician Reviewer for determination of medical necessity. These scheduled rounds are an opportunity to develop inter-rater reliability amongst UM reviewers. Per department policy, all UM reviewers attend all scheduled rounds.

GHC-SCW's Medical Director is a Board-Certified Family Practice physician who is responsible for the implementation of clinical utilization management (including behavioral health care aspects) and quality improvement. Medical effectiveness and utilization trends are shared with the medical staff on an ongoing basis to monitor under and over utilization. The Medical Director is available by cell phone and/or in the administrative office and will provide for appropriate coverage if unavailable by designating a qualified, licensed senior physician or physician reviewer to act in their absence, as necessary.

The Medical Director for Behavioral Health is a GHC-SCW psychiatrist who is actively seeing patients part-time. GHC-SCW's Medical Director of Care Management serves as back-up for Behavioral Health reviews as needed.

Medical and Behavioral Health reviews for determining medical necessity are performed utilizing the following and most current:

- Member Certificate – Do they have coverage?
- Care Management Medical Policies
 - Specialist Consultants
 - Pharmaceutical & Technology Assessment Committee Decisions
- ASAM Treatment Criteria for Addictive, Substance-Related, and Co-Occurring Conditions
- WI-UPC: D3 LOC – Used for clinically managed residential detox
- Milliman Care Guidelines (MCG)
- Hayes Technology Reviews
- Up to Date
- Reference to other Health Plan policies (comparing accepted standards)
 - Aetna
 - Quartz
 - Dean/SSM

Purpose:

To conduct a series of coordinated and integrated activities that assist in:

1. Maintaining and improving high quality medical and behavioral health care and services to our members across the full continuum of care.
2. Meeting fiduciary responsibilities.
3. Complying with accreditation and regulatory requirements.

Goals:

To be objective, consistent, impartial, and fair while at the same time achieving the following standards:

1. Promoting, monitoring, and evaluating the delivery of high quality, cost effective medical and behavioral health or Substance Use Disorder (SUD) care services for all members
2. Making UM decisions based on medical necessity, appropriateness, and availability of resources and benefits
3. Ensuring confidentiality of personal health information
4. Monitoring and improving practitioner and member satisfaction
5. Connecting members to case management services when appropriate

Objectives:

1. To provide consistency during the UM review and decision-making process
2. To ensure that medical and behavioral health care and SUD services are medically necessary, appropriate, and provided in the most cost-effective setting.
3. To facilitate communication and collaboration among members, practitioners/providers and the organization to support cooperation and appropriate utilization of health care benefits.
4. To provide information to practitioners regarding utilization management updates and activities.
5. To identify high utilization of resources and implement appropriate case management activities.
6. To render timely determinations and issue timely notifications.
7. To identify and initiate process improvement activities to enhance overall quality improvement.
8. To assist with discharge planning and transition of care issues.

Utilization Management Structure and Accountability

The GHC-SCW Board of Directors grants UM authority to the Chief Medical Officer and the Medical Director of Care Management with the Medical Director having direct responsibility for UM activities. The Medical Director assigns the daily responsibilities of UM operations to the Care Management Manager. Behavioral Health and SUD UM activities are the responsibility of the Medical Director of Behavioral Health and the Director of BH & Medical Specialty Services. Pharmacy UM activities are assigned to the Manager of Pharmacy Services. The Chief Medical Officer also has delegated to Magellan Rx Management LLC (MAGELLAN) and its related entities the responsibility to perform specific utilization management functions for prior authorizations of specialty medical pharmaceuticals on behalf of GHC-SCW to the patients and members of the cooperative.

The Medical Director of Care Management and the Care Management Manager conduct an annual evaluation of the program structure, processes, and sources used to determine benefit coverage and medical necessity including UM Policies. The outcome of an effective UM Program demonstrates appropriate utilization of medical resources to maximize the effectiveness of care and services provided to the members. The organization evaluates all aspects of the UM Program, including any delegates and if required, their performance, at least annually.

UM Responsibilities

The following persons are actively involved in implementing specific aspects of the UM Program.

1. Medical Director – responsibilities include, but are not limited to:
 - a. General Care Management (CM) Department oversight.
 - b. Serves as the liaison between the organization’s primary care practitioners and external specialists and the Care Management Department.
 - c. Assists in the analysis of utilization data for problem identification and prioritization
 - d. Develops and implements action plans along with evaluation of corrective actions.
 - e. Acts as the primary physician reviewer and makes determinations regarding:
 - i. All Medical Necessity denial determinations.
 - ii. All potentially cosmetic/experimental procedures.
 - iii. Out-of-network practitioners.
 - f. Assists in the selection of UM criteria, reviews and updates medical policies.
 - g. Chairs the Pharmaceutical and Technology Assessment Committee and participates in reviews.
 - h. Collaborates with vendors, employer groups, and providers regarding UM issues, and serves as a clinical resource for the Care Management Department.
 - i. Participates in CSQC meetings as appropriate.
 - j. Actively involved in implementing GHC-SCW’s UM program.
 - k. Delegates UM decisions to other physician reviewers as needed. Other reviewers include:
 - i. GHC-SCW’s Chief Medical Officer
 - ii. Primary Care Physician Reviewers
 - iii. Medical Director of Behavioral Health
 - iv. Magellan Rx Management, LLC
2. The Behavioral Health Medical Directors responsibilities include, but are not limited to:
 - a. Assists with the development, revisions, and/or implementation of Mental Health UM activities, policies, and procedures.
 - b. Reviews and makes determinations regarding:
 - i. All Medical Necessity Behavioral Health denial determinations including SUD, transitional & inpatient admissions and continued stay.
 - ii. Requests for services with Out-of-network practitioners

- c. Actively involved in implementing the behavioral healthcare aspects of the UM Program.
 - d. Attends Continuity & Coordination of Medical and Behavioral Health Care Committee and Pharmaceutical & Technology Assessment Committee (PTAC), meetings as appropriate.
3. The Director of BH & Medical Specialty Services responsibilities include, but are not limited to:
- a. Making decisions regarding the appropriateness of behavioral health services including the level of care and proper setting based on evidence-based criteria including MCG, Technology Assessment Policies, American Society of Addiction Medicine (ASAM), or Care Management Medical Policies.
 - b. Delegating clinical decision making to a master's level clinician, who has a minimum of five years of experience who can then provide and supervise initial assessments, prioritization of patients for behavioral health treatment via telephone and/or face to face intake (triage). Currently, this position is held by a Licensed Marriage and Family Therapist.
 - c. Ensuring all departmental therapists are duly licensed by the State of Wisconsin for their appropriate level licensure in order that they can participate in prioritization of members for behavioral health treatment and referral decision making.
 - d. Supports the use of a licensed board-certified psychiatrist for oversight of inpatient utilization services and formal denials of other behavioral health services.
 - e. Participates in Pharmaceutical & Technology Assessment Committee (PTAC) as needed.
4. The Care Management Manager's responsibilities include, but are not limited to:
- a. Directs and manages the UM/CM Processes and the Care Management Department,
 - b. Collaborates with the Medical Director, on the annual review of the effectiveness of the UM Program.
 - c. Ensures that the department is following NCQA Standards and regulatory requirements.
 - d. Develops, revises, and implements CM policies.
 - e. Coordinates Inter-rater reliability activities and UM Rounds, both medical and mental health (behavioral health and SUD).
 - f. Collaborates with internal practitioners, external vendors, employer groups, and providers regarding UM issues.
 - g. Supervises staff responsible for making administrative denials.
 - h. Participates in multi-departmental committees related to appeals, benefits, finance, operations, and technologies.
 - i. Assists the Medical Director with technology assessment.
 - j. Updates and presents UM program description annually to CSQC for approval.
5. Case Management and Utilization Management RNs and Social Worker responsibilities for medical and behavioral health include, but are not limited to:
- a. Perform pre-service, concurrent, and post-service reviews.
 - b. Utilization Management RNs can approve UM benefit and medical coverage if medical and or benefit criteria is met. If medical criteria are not met, case must be taken to medical rounds for the Medical Director/Physician Reviewer approval or denial.
 - c. Case Managers approve Transition of Care for periods of up to 90 days for new members who meet for continuity of care criteria.
 - d. Assuring referral authorizations and administrative denials are made within recommended time frames.
 - e. Collaboration with internal practitioners, external vendors, employer groups, and providers on UM issues.
 - f. Participating with inter-disciplinary committees.

- g. Collaborating with patient, providers and employer groups to assess, plan, implement, coordinate, monitor and evaluate options and services.
 - h. Assist in the management of patient care to ensure optimum outcomes.
 - i. Provide education and assistance with available resources to promote quality and cost effective outcomes.
6. Care Management Associates (CMA) responsibilities include, but are not limited to:
- a. Perform timely data entry of referrals.
 - b. Care Management Associates can make benefit approvals on procedures and tests that are listed on the CMA approval list. This list is reviewed as needed and at least annually.
 - c. Help the UM staff to ensure timeliness of referral activities, i.e. obtaining On Base scans for UM staff to begin their reviews.
 - d. Direct practitioners to appropriate referral resources.
 - e. Authorize routine referral services that do not require a Prior Authorization.
 - f. Refer all services requiring prior authorization to UM Staff.
 - g. Conduct 2nd claims review.
 - h. Ensure timely printing and mailing of pre-certification, authorization and denial letters.
7. Manager of Pharmacy Services responsibilities include, but are not limited to:
- a. Making pharmaceutical determinations based on medical necessity and the implementation of a recommended step-therapy protocol.
 - b. Manages administrative pharmacists who make UM approvals and denials.
8. Manager of Member Services responsibilities include, but are not limited to:
- a. Processing appeals of UM denials.
 - b. Manages the day to day activities of Member Services staff that provide members with benefit information and explanation.
9. Magellan Rx Management LLC's responsibilities involve the UM aspects specific to prior authorizations of specialty medical pharmaceuticals. A signed delegation agreement exists between both parties with amendments, as appropriate, when any of the responsibilities of our respective parties change.

Scope

Care Management develops criteria for UM Staff through the Pharmaceutical & Technology Assessment Committee and/or with input from an appropriate specialist. As new procedures, medications and treatments become available, the PTAC committee reviews related research information from reputable resources such as Hayes Technology. The committee meets and discusses the research including the input from specialists to determine whether the technology is appropriate, evidence-based and/or standard of practice. Medical or Behavioral Health criteria may be revised periodically as changes occur and/or annually by Medical Director or the Committee. UM staff have policies and workflow processes to assist them in determining referral management, outpatient and inpatient medical necessity along with the appropriate medical and/or behavioral health criteria sets. Each UM staffer is trained in applying the evidence-based criteria and in preparing UM reviews for the Medical Director and/or Physician Reviewer. UM staff audits are also performed biannually to ensure consistency with what is being provided to the Medical Director, that proper selection and application of evidence-based criteria is taking place, and that any administrative denials are made within scope.

UM staff have written procedures delineating how to document and select the appropriate policy, PTAC, or Milliman Guideline to support the clinical decisions they are making. These procedures are contained in policy CM.ADM.002 Care Management Review Criteria.

The scope of UM activities for Medical and Behavioral Health include but are not limited to the following functions:

1. Benefit clarification.
2. Referral Management.
3. Pre-service, concurrent, and post-service review and timely determinations.
4. Out-of-area services.
5. Complex Case Management, including discharge planning and transition of care.
6. Second review of claims.
7. Technology assessment.
8. Inter-rater reliability.
9. Monitoring adverse effects and sentinel events.
10. Integration with QM Department, Pharmacy, Mental Health Department, Marketing, Finance, and Insurance Operations.
11. Interdisciplinary communications.
12. Over and underutilization.
13. Review, discussion, and adaptation of UM criteria to NCQA language.
14. Develop policies to clarify benefits.
15. Denial and appeal notifications.

Processes for the UM activities/functions:

1. Benefit clarification to determine whether member has coverage
 - a. UM staff is responsible to know the benefits related to a member's Certificate language when requests are received for a review
 - b. UM staff checks eligibility on each UM request received as part of the review process

2. Prior Authorization Management
 - a. GHC-SCW provides Primary Care services and select specialty services within GHC-SCW owned clinics. Specialty services/care outside of a GHC-SCW owned clinic is subject to requiring prior authorization. The prior authorization list is determined by senior leaders and based upon standards of practice and financial impact of select services. PCP's initiate outside services with a written order.
 - b. PCP submits an order to Care Management Associates who are responsible for either approving the request or routing it to UM Staff for review.

Type of Review	Decision Timeline	Notification Electronic or written	Verbal May provide oral notification	Extension
Routine pre-service (non-urgent)	15 calendar days from receipt	15 days		GHC does not use extensions but will deny for lack of information
Urgent (pre-service)	48-72 hours of receipt of request	Within 72 hours of request	Within 72 hours of request	If insufficient or lack of info and requested by GHC within 24 hours of receipt of request, can allow 1 day up to 48 hours for member/rep to provide additional info
Concurrent Urgent (Active Treatment)	24 hours of receipt	24 hours unless verbal is given first within 24 hours; then have 72 hours to provide written/electronic	Within 24 hours of request	If request to extend is not received with 24 hours of expiration of prescribed period or # of treatments, may extend up to 72 hours and treat as urgent pre-service
Retro (post service)	30 calendar days	30 calendar days		GHC does not use extensions but will deny for lack of information

3. Pre-service, concurrent, and post-service review and timely determinations; Over and underutilization of services; Denial and appeal notifications
 - a. UM staff follows NCQA guidelines for timely decision making in each respective category:
 - i. CM.MED.007 Pre-Service and Timely Determinations
 - b. UM staff utilize evidence-based medicine guidelines which consists of the following:
 - i. Member’s Certificate language-benefit information
 - ii. Care Management Medical Policies, PTAC policies, MCG 22ndEdition, ASAM, Hayes
 - c. UM staff utilize the policy/guidelines in the UM process and documents the appropriate clinical information within Epic to show if the services received do/don’t meet the guidelines
 - i. Policy CM. ADM.013 Documentation of Clinical Information
 - d. UM staff prepares cases for review by MD which do not meet guideline/criteria in a timely manner as defined in the NCQA Standards and Guidelines, table above and CM. ADM .003
 - e. ER services are not reviewed for medical necessity
 - f. Out of area services are reviewed by the Medical Director/Physician Reviewers to determine medical necessity.

4. Case Management works collaboratively with Utilization Management to provide transition of care (TOC) services and discharge planning.
 - a. Case Management processes are listed within the CM. MED. 039 policy
 - b. Case Managers assist with TOC following policy CM. ADM .012

5. Second review of claims

- a. "Pended" claims are reviewed by UM staff for services which require but have no prior authorization on file, or do not match codes within a current authorization; (retrospective)
- b. PPO members who do not obtain prior authorization per their benefit summary may be penalized by UM Reviewers as stated in the Member's Schedule of Benefits

6. Technology Assessment

- a. Policy CM.ADM.010 documents the existence of the Pharmaceutical & Technology Assessment Committee and its role at GHC-SCW
- b. Peer reviewers/specialists provide clinical information on new technologies/procedures/trends within medical, pharmacy and behavioral health fields

7. Inter-rater reliability

- a. Policy CM.MED. 011 Inter-rater Reliability documents the process that GHC-SCW uses to review and assess the consistency of personnel involved in making utilization review determinations.

8. Monitoring for adverse effects and sentinel events

- a. Policy CM.MED.018 Quality of Care Issues establishes procedures for dealing with "adverse events" associated with the care of members within GHC-SCW clinics/services or contracted medical staff and facilities.

UM Clinical Criteria Review

UM staff makes determinations based on medical necessity and appropriateness for inpatient and outpatient care including behavioral health and SUD. Staff uses clearly written, published criteria which is evidence-based to evaluate the necessity of medical services. These criteria sets are intended to be used as guidelines, and in combination with professional clinical judgment, applied when determining necessity of requested services. Adaptation of these guidelines may be necessary based on individual needs and standard of care within the local delivery system. Criteria review is covered in CM ADM 002.

The Care Management Manager annually reviews the criteria and the procedures for applying them and updates the criteria as appropriate. The criteria used are the most current version of:

- ✓ Care Management Medical Policies
 - Specialist Consultants
 - Pharmaceutical & Technology Assessment Committee Decisions
- ✓ ASAM Treatment Criteria for Addictive, Substance-Related, and Co-Occurring Conditions
- ✓ WI-UPC: D3 LOC – Used for clinically managed residential detox
- ✓ Milliman Care Guidelines
- ✓ Hayes Technology Reviews
- ✓ Up to Date
- ✓ Reference to other Health Plan policies (comparing accepted standards)
 - Aetna
 - Quartz
 - Dean/SSM

The UM decisions are determined with the use of nationally developed guidelines/criteria, as well as, GHC-SCW's consideration of the following additional information regarding our members:

- Age
- Comorbidities
- Complications
- Progress of treatment
- Psychosocial situation
- Home environment, when applicable

GHC-SCW also considers the characteristics of the local delivery system such as:

- Availability of skilled nursing facilities (SNF), sub-acute care facilities, or home care to support the member upon discharge
- Awareness of individual coverage of benefits for SNF, home care and sub-acute facilities to support medical/behavioral health services when appropriate
- The availability of services within local hospitals to provide member with needed care.

Active practitioners and specialists are members of the PTAC which meets at least quarterly to review new technology and services available to GHC-SCW members. This committee is involved in the development, adoption and review of MCG revisions and nationally developed standards. Criteria used to make UM determinations are available to practitioners on the GHC-SCW Clinical Resources Dashboard and upon request. Practitioners and members are informed on how to request the UM criteria within every denial letter.

Inter-rater Reliability

At least annually, GHC-SCW evaluates the consistency with which health care professionals involved in UM apply criteria in decision making. This process includes physicians, UM clinical staff consisting of Social Workers, RNs, and pharmacists making medical and behavioral health and or SUD determinations. Cases are reviewed at identified intervals as part of a group educational process. These include, but are not limited to, at least weekly UM Medical and Mental Health Rounds to evaluate determinations and problem cases. When areas of improvement are identified, processes and/or interventions are developed, or policies are revised. The changes are implemented after staff education is provided. Monitoring of these improvements occurs during the weekly Rounds.

The goals of inter-rater reliability include, but are not limited to:

1. Consistency in the application of clinical guidelines.
2. Evaluation of reviewers' ability to identify potentially avoidable utilization thus reducing costs.
3. Evaluation of reviewers' ability to identify quality-of-care issues.
4. Identifying specific areas in need of improvement.
5. Identifying areas where additional training is needed.

In addition, the CM department has available an inter-rater reliability tool through MCG which provides on-line hypothetical case scenarios where UR staff apply the guidelines and are scored per correct application of the guidelines. Health care professionals involved must receive a 95 % passing score as a standard for all UR personnel. Additional learning modules are available through MCG and assigned for staff that need additional education to improve consistency. Newly hired staff are assigned the initial learning modules to assist in learning the UM criteria review processes.

The Care Management Manager conducts randomized audits. When issues or concerns are identified, a process improvement plan will be implemented to rectify the concern. The department conducts monthly staff meetings where areas of concern and issues regarding UR are discussed as a group and additional education is provided as needed. Appropriate changes are made within the department's processes per CM.MED.011; Inter-Rater Reliability.

Communication Services

Care Management staff are accessible to members and practitioners/providers to discuss UM issues. (See CM.MED.021, *Communication Services*)

- Care Management staff is available electronically or by phone between the hours of 8:00 am and 5:00 pm, Central Standard Time, Monday through Friday, excluding holidays. There are both local and toll-free phone numbers for the Care Management Dept.
- During weekends, holidays, and non-working hours, the Care Management Department has confidential electronic and voice mail boxes which are responded to within 24 business hours from receipt of the message. Staff has the availability to access their voicemail remotely in case of unexpected absences; callers can be referred to alternate staff for assistance if needed.
- Care Management staff identifies themselves by name, title, department, and organization when initiating or returning phone calls.
- The Care Management Department has a dedicated fax machine located within the department, which is available 24 hours per day, 7 days per week.
- GHC-SCW's Member Services Department screen incoming phone calls and will transfer calls to Care Management personnel when appropriate.
- GHC-SCW offers TDD/TTY services for deaf, hard of hearing or speech-impaired members.
- GHC-SCW offers free of charge language assistance for non-English speaking members to discuss UM issues.

Appropriate Professionals

Utilization Management determinations are made by qualified, licensed healthcare professionals. These professionals include physicians, chiropractors, dentists, appropriate behavioral health practitioners, physical/occupational therapists or pharmacists. The appropriate professional reviews medical or behavioral health denials based on medical necessity. Board-certified physician specialists are utilized to assist in making medical necessity determinations per CM.ADM.017 Appropriate Professionals.

- Three (3) GHC-SCW Physician Reviewers are available for making medical necessity determinations.
- Board-Certified Physicians from the University of Wisconsin (UW) Hospital and Clinics and UW Medical Foundation may be used as consultants, when necessary, to assist in making determinations of medical necessity when situations occur where the clinical judgment is sufficiently specialized such that primary care physicians are unable to adequately address the issues in question. GHC-SCW's Medical Staff Administrator maintains the list of UW specialists and makes it available to the physician reviewers and department managers on an as needed basis.
- Medical Review Institute of America, LLC may be used, as needed, to provide same or similar specialty external reviews.
- UM decision making is based only on appropriateness of care and service and existence of coverage. GHC-SCW does not use incentives to encourage barriers to care and service nor does it make decisions about hiring or terminating practitioners or other staff based on the likelihood, or on the perceived likelihood, that the practitioner or staff supports, or tends to support denial of benefits.

- GHC-SCW has written job descriptions identifying the qualifications required for a practitioner to review denials of care as related to their specific professional experience.
- Practitioners must have a current license to practice without restrictions.
- New employees and practitioners are presented the Affirmative Statement Regarding Incentives (policy (CM.ADM.020) during their orientation; the Affirmative Statement is signed annually thereafter.
- GHC-SCW does not offer any type of incentive to encourage denials or placement of barriers for members to receive care.
- GHC-SCW ensures that a physician, appropriate behavioral healthcare practitioner or pharmacist, as appropriate, reviews any behavioral healthcare denial of care based on medical necessity.
- A benefit denial is a requested service which is specifically excluded from a member's benefit plan, which GHC-SCW is not required to cover under any circumstances. These may be limited by numbers, duration or frequency in the benefit; limited to no extensions beyond specific date, time or number and/or specified if an exclusion in the benefit plan.

Timeliness and Notification of UM Decisions

CM staff and physician reviewers make timely and consistent determinations for all UM activities requiring review to assess the medical necessity and/or appropriateness of care or services. These determinations apply to both urgent and non-urgent requests, and extensions of time may be requested if a determination cannot be made in a timely manner due to the lack of necessary information. In whole or in part decisions and notifications are communicated to appropriate members, practitioners, and providers in a timely manner to accommodate the clinical urgency of the situation to minimize any disruption in the provision of health care.

Medical Necessity refers to services or supplies for diagnosing, evaluating, treating or preventing an injury, illness, condition or disease, based on evidence-based clinical standards of care. **Medically necessary services** are accepted health care services and supplies provided by health care entities, appropriate to evaluation and treatment of a disease, condition, illness or injury and consistent with the applicable standard of care. Determination of medical necessity is based on specific criteria.

1. Timeliness of Decision Making for Medical and Behavioral Health UM Decision:
 - a. For non-urgent pre-service decisions, GHC-SCW makes decisions within 15 calendar days of receipt of the request. For requests, which come in after hours, GHC-SCW counts the time of receipt as the next business day.
 - b. For urgent pre-service decisions, GHC-SCW makes decisions within 72 hours of receipt of the request.
 - c. For urgent concurrent review, GHC-SCW makes decisions within 24 hours of receipt of the request.
 - d. For post-service decision, GHC-SCW makes decisions within 30 calendar days of receipt of the request.
2. Notification of Medical and Behavioral Health Decisions:
 - a. For all determinations, GHC-SCW gives electronic or written notification of the decision to practitioners and members within the time frames listed under 1a-d above, as per NCQA guidelines.
 - b. Notification of urgent request decisions, GHC-SCW may notify the practitioner only of the decision since NCQA assumes the treating or attending practitioner is acting as the member's representative.

- c. If the decision for urgent care requests is either concurrent or post-service (retrospective) and the member is not at financial risk, GHC-SCW is not required to notify the member. GHC-SCW must notify the member in all other cases.
- d. If requests for health care services come from a practitioner, GHC-SCW may send the request for additional information to the practitioner; but must notify the member if it denies the services.

Care Management accepts non-urgent prior authorization requests via fax or electronic entry. Fax requests are accepted and processed same day or next business day. On weekends and holidays, fax requests are entered the next business day.

GHC-SCW reviews requesting services for our members in the following ways:

1. *Referrals*: Referrals result from written orders from GHC-SCW Primary Care Providers to see in-plan specialty care providers. The terminology of “referrals” is used like prior authorization. Not all referrals require review, and many serve only as proof of GHC-SCW’s intent to pay for the requested service.
2. *Prior Authorization*: The basic elements of prior authorization review include eligibility verification, benefit interpretation and administration, medical necessity review of both in and outpatient services. The Prior Authorization list is available on GHC-SCW’s website for providers and members’ convenience. Disclaimer indicates that the Member’s Certificate supersedes the Prior Authorization list as the list is not all inclusive for all products or benefit certificates that GHC-SCW offers. Requests for services requiring prior authorization is reviewed and determinations are made by using appropriate clinical criteria applied by UM personnel. Any additional services or extension of services beyond initial authorization will require submission of clinical documentation for medical necessity review.

Pre-Service Review Determinations

1. Pre-service urgent determinations are defined as any request for medical care or services whereby application of non-urgent time periods could seriously jeopardize the life or health of the member or the member’s ability to regain maximum function, based on a prudent layperson’s judgment, or in the opinion of a practitioner with knowledge of the member’s medical condition, would subject the member to severe pain that cannot be adequately managed without the care or treatment that is the subject of the request.
2. Pre-service non-urgent determinations are defined as those required for a request presented prior to the member receiving medical care or services.

Concurrent Review Determinations

1. Concurrent review determinations are any review for the extension of a previously approved ongoing course of treatment over a set period or number of treatments. These reviews are typically associated with inpatient admissions or ongoing ambulatory care.
2. Concurrent urgent determinations are defined as any request for medical care or services whereby application of non-urgent time periods could seriously jeopardize the life or health of the member or the member’s ability to regain maximum function, based on a prudent layperson’s judgment, or in the opinion of a practitioner with knowledge of the member’s medical condition, would subject the member to severe pain that cannot be adequately managed without the care or treatment that is the subject of the request.

3. Concurrent non-urgent determinations are defined as those requests that do not meet the above definition for urgent care and may be handled as a new request and decided within the time frame appropriate to the type of decision.

Post-Service Review Determinations (Retrospective Reviews)

1. Utilization Staff and physician reviewers make timely and consistent determinations for all UM activities requiring review to assess the medical necessity and/or appropriateness of care or services requested that have already been provided to the member. Extensions of time may be requested if a determination cannot be made due to lack of necessary information. Decisions and notifications are communicated to appropriate members, practitioners, and providers in a timely manner.

Extension of timeframes

1. Non-urgent preservice and post-service decisions, or Urgent preservice/concurrent decisions are acceptable if the organization is unable to decide due to the lack of necessary information. Members may also voluntarily agree to extend a decision timeframe if they need to obtain information or be evaluated by specialists.

Clinical Information

Relevant clinical information that is pertinent to an identified episode of care is collected from the treating physician and other appropriate practitioners and documented to support accurate and appropriate UM determinations of coverage based on medical necessity for medical and behavioral health services i.e. MH and SUD; CM.ADM.013.

Clinical information may include, but is not limited to:

- Office and hospital records.
- A history of the presenting problem.
- Physical exam results.
- Diagnostic testing results.
- Treatment plans and progress notes.
- Patient psychosocial history.
- Information on consultations with the treating practitioner.
- Evaluations from other health care practitioners and providers.
- Operative and pathological reports.
- Rehabilitation evaluations.
- A printed copy of criteria related to the request.
- Information regarding benefits for services or procedures.
- Information regarding the local delivery system.
- Patient characteristics and information.
- Information from family members.

Behavioral Health

GHC-SCW *does not* have a centralized triage and referral process. GHC-SCW has numerous ways for our members to obtain Behavioral Health services as it is based on who the member selected as their Primary Care Provider or Clinic Location.

- GHC-SCW members have direct access to behavioral health care *without* prior authorization or referral at four different GHC-SCW clinics and at UW Behavioral Health and Recovery.
- GHC-SCW members can directly call or walk in to a clinic to obtain behavioral healthcare. After hours, GHC-SCW members calling the 24-hour crisis line with behavioral healthcare inquiries are routed to an on-call behavioral healthcare practitioner.
- GHC-SCW Member Service staff provides members with information about in-network behavioral healthcare practitioners and how to access care, but do not make judgments about the needed level of care or type of practitioner that the member should see.
- GHC-SCW members who selected a PCP outside of Dane County have access to contracted Behavioral Health providers who follow an authorization process for medical necessity review.
- GHC-SCW members who selected a PCP outside of Dane County can contact the 24-hour crisis line with behavioral healthcare inquiries and have access to GHC-SCW NurseConnect, a 24-hour health information line.

Denial Notices

The Utilization Review staff clearly documents and communicates the reasons for each denial and provides members and their treating practitioners with the opportunity to discuss a denial with an appropriate reviewer. A copy of the benefit language or criteria on which the denial determination was made is sent to the provider, member, and practitioner upon request. This applies to all UM denials: medical, pharmaceutical, and behavioral health and SUD. Members and providers are directed to the GHC-SCW Member Services Department for appeal submission and resolution.

1. Utilization Review staff provide written denial notifications for all medical necessity denials that include the following:
 - a. The specific reasons for the denial, in easily understandable language.
 - b. A reference to the benefit provision, guideline, protocol or other similar criterion on which the denial decision is based.
 - c. 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.
 - d. For lack of information denials, reference to the clinical criteria that has not been met must be included. If we are unable to provide a specific policy, we describe the information needed to render a decision.
2. Staff members attach written appeal information in all denial notifications which includes:
 - a. Description of appeal rights, including the right to submit written comments, documents, or other information relevant to the appeal
 - b. Explanation of the appeal process, including the right to member representation, and time frames for deciding appeals
 - c. If a denial is an urgent pre-service or urgent concurrent denial, a description of the expedited appeal process is included. (policy SM.MS.001)
 - d. Notification that expedited external review can occur concurrently with the internal appeals process for urgent care

3. For medical necessity denials, UR staff notifies practitioners of the availability of an appropriate reviewer for discussion of the denial and how to contact that reviewer either via written directions in the denial letter, staff messages in the Epic system, or a phone call to the practitioner's office. Staff documents the time and date of both the denial notification, the offer of reviewer availability, as well as conversations with the practitioner regarding the specific case while the denial decision was pending.
 - a. The Medical Director and UR staff is available for discussion of medical denials.
 - b. The Chief of Chiropractic Services is available for discussion of chiropractic care denials.
 - c. The Behavioral Health Medical Director, Director of BH & Medical Specialty Services, UR staff and appropriately qualified clinical mental health staff are available for discussion of behavioral health/SUD denials.
 - d. The Manager of Pharmacy Services and administrative pharmacists are available for discussion of pharmaceutical denials.
 - e. GHC-SCW Practitioners are informed of the denial and appeal process during their initial orientation and periodically in the "Practitioner Update" newsletter.
 - f. Member appeals/grievances will be accepted by Member Services without time limitation.

4. The External IRO appeal process is administered by the Federal Government Office of Personnel Management (OPM). The member or representative has the right to request an independent review. An insured member may authorize another individual to request an independent review in any written form that is signed by the insured member. (CM. ADM. 003 Denial and Timely Appeal Notification)
 - a. A written request must be submitted within 4 months of notice of the adverse benefit determination or final internal adverse benefit determination.
 - b. The request for an external review must be submitted in writing or electronically to: DisputedClaim@opm.gov; by fax to 202-606-0036; or by mail to PO Box 791, Washington, DC 20044.
 - c. If there are any questions during the external review process, the member or representative may call toll-free 877-549-8152.
 - d. If additional written comments are submitted to the external reviewer at the mailing address above, it will be shared with GHC-SCW to give GHC-SCW the opportunity to reconsider the denial.
 - e. The IRO's decision is legally binding on both the complainant and the insurer.

Appropriate Handling of Appeals

GHC-SCW's Appeals policies (INS.MS.001 & INS.MS.048) outline the organizations procedures for thorough and timely resolution of appeals including a description of the system controls utilized to store and secure UM appeal information and dates. GHC-SCW has a full and fair process for resolving member disputes and responding to member's requests to reconsider a decision they find unacceptable regarding care and service. The documentation, investigation and appropriate response to an appeal are coordinated through the Member Services Department.

Evaluation of New Technology

GHC-SCW has a formal mechanism to evaluate and address new developments in technology and new applications of existing technology for inclusion in its benefits plan to keep pace with changes and to ensure that members have equitable access to safe and effective care. The Pharmaceutical & Technology Assessment Committee (PTAC) meets at least quarterly or as needed, to conduct assessments per Policy CM.ADM.010.

GHC-SCW's written process for evaluating new technology and the new application of existing technology for inclusion in its benefits plan includes an evaluation of the following:

1. Medical procedures.
2. Behavioral healthcare procedures
3. Pharmaceuticals.
4. Devices.

The current PTAC is responsible for review and approval of pharmaceuticals and related pharmacy management procedures.

1. Technology Categories: technologies encompass medical procedures, behavioral health procedures, pharmaceuticals, and devices.
2. Review Categories:
 - a. Proactive reviews are usually initiated when a new technology is identified from published scientific evidence or an appropriate government regulatory body.
 - b. Reactive or urgent reviews are triggered by a provider's request for the use of a new technology, a new application of an existing technology, or a special review case.
 - c. Retrospective reviews are conducted when the request was received after the service was provided.
 - d. Scheduled review of established GHC-SCW technology assessments.
3. Technology Evaluation Sources include but are not limited to:
 - a. Hayes Incorporated, which is a major vendor of technology assessments.
 - b. The Food and Drug Administration (FDA) information as contained in the Hayes & TEC reports
 - c. Technology Evaluation Center (TEC) sponsored by the Blue Cross/Blue Shield Association and Kaiser Permanente.
 - d. Reports from governmental agencies and medical associations, i.e. Center for Disease Control (CDC), American College of Obstetricians & Gynecologists or recognized sites like Medline may be utilized.
 - e. Medical literature published in peer reviewed journals or by other health plans i.e. Aetna, Cigna, United Healthcare, CMS, Medline, etc.
 - f. Local medical expert opinion or specialty physician consultants.
 - g. Up-to-date which is an evidence-based clinical decision support resource authored by physicians to help healthcare practitioners make the best decisions at the point of care by combining the latest clinical knowledge with cutting-edge technology.
 - h. CMS-Medicare regulatory rules
 - i. Milliman Care Guidelines
4. Review Criteria for Determinations: technology assessment decisions are based upon the following criteria:
 - a. The technology must have received final approval from the appropriate government regulatory bodies, if applicable, e.g. FDA, AMA, CMS (formerly known as HCFA).
 - b. The scientific evidence must permit conclusion concerning the effect of the technology on health concerns.
 - c. The technology must be as beneficial as any established alternative.
 - d. The technology must improve the net health outcome of the patient.
 - e. The technology must be attainable outside the investigational setting.

Procedures for Pharmaceutical Management

A complete description of the Pharmaceutical Management Program and the UM system controls utilized for pharmacy denials is outlined in policy CL.PH.BEN.008. This policy is posted on ghscsw.com as a provider resource.

UM System Controls

Group Health Cooperative of South Central Wisconsin has system controls in place to manage UM medical necessity decisions in the scope of NCQA's health plan guidelines for Timeliness of UM Decisions. These controls protect UM denial data from being altered outside of prescribed protocols. GHC-SCW utilizes the Tapestry platform within Epic as our UM system for medical and behavioral health.

1) *The date of receipt consistent with NCQA requirements*

- The date of receipt is defined as the date of arrival on which GHC-SCW initially receives written notification of a referral request from a provider.
- Referral requests received via fax are dated at the top of the incoming fax and this date is entered by the Care Management Associate creating the referral.
- Referrals entered electronically via EpicLink are time date stamped within Tapestry and cannot be altered.

2) *The date of written notification consistent with NCQA requirements*

- The date of written notification is defined as the date on which the decision letter is generated to the practitioner and member by GHC-SCW or if electronic notification is used, the date posted in the electronic system.
- Decision dates are time/date stamped within Tapestry and cannot be altered once accepted.
- Decision notification is made via RightFax™ immediately upon generation of the decision letter. If fax is unavailable, letters generated each business day are mailed within 24 hours.
- Concurrent decision may be communicated via telephone with the ordering provider.

3) *Process for recording dates in the system*

- Upon each entry, the Tapestry system stamps the date and time of the entry along with the name of the person entering the information. This cannot be changed by ANY Utilization Management staff, including MD and Manager.
- The system tracks a history of all persons working within the referral and each step they have made such as changing provider information, creating a note, generating a letter or adjusting the status of the referral. The system is detailed and tracks all entries made within a referral.

4) *Level of staff authorized to modify dates once initially recorded and any circumstances when modification is appropriate or justified*

- Care Management employees can change specific dates within a referral request. These include start date and end date, bed days information, discharge dates and referred upon dates. Examples where this would be appropriate may include:
 - When a scheduled surgery has been changed to another time
 - When a provider notifies GHC-SCW of a change in scheduled procedures
 - When approved services are extended such as in skilled nursing stays or hospitalizations.
 - When a referral is received via epic link or via fax, the CMA staff review all entries to assure they align with the request being made. Adjustments are made at this time.

5) *How GHC-SCW tracks modified dates such as when and what modification was made, the staff who made the change and why the date was altered.*

- Each entry associated within a referral is stamped with the date, time and name of the authorized personnel who made the entry. This information is viewable within the audit trail of the referral. Adjustments made by entering CMA staff do not require a note to be made, however notes are required by UM staff to explain any changes made and cannot be edited once the entry is closed.

6) *Processes in place that protect data from unauthorized access or modification*

- GHC-SCW has systems in place to prevent physical access to work areas. These practices include employee badge identification requirements to access the physical workspace located behind locked doors.
- GHC-SCW has systems preventing unauthorized access and changes to data. Software systems have password requirements with login ID's that are managed through the IT Security department.
- GHC-SCW has a secure identification system for password protection. We have two factor identification and password changes are required every 60 days and cannot be duplicated with any password used within the previous year.
- GHC-SCW practices the policy of disabling passwords of employees who leave their role or the organization. Managers submit an offboarding request to the IT Security Administrator and access is ended within 1-3 business days. HR Policy mandates that employees that are being let go have their access removed immediately.

7) *How GHC-SCW audits the process and procedures in items 1-6 above.*

- Audits will be conducted by the Manager of the Care Management Department
- A random sampling is of 10 referrals per employee per quarter will be reviewed.
- Any deficiencies with compliance are identified and a corrective action plan will be implemented to address any issues with the system or with the GHC-SCW associates involved with the referral sampled
- GHC-SCW's Compliance Department also conducts random audits of employees accessing member records to ensure employees are only accessing records directly related to their work.

Delegation of UM

Group Health Cooperative of South Central Wisconsin began delegating to Magellan Rx Management, LLC, UM functions specific to the prior authorization of specialty medical pharmaceuticals on March 1st, 2018. A formal written delegation agreement delineates which activities have been delegated and includes the responsibilities for both GHC-SCW and Magellan as defined under the NCQA standard for Delegation of UM.

Quality of Care Issues

Care Management (CM) staff monitor, identify, document, and report potential quality of care issues to the Medical Director, Medical Staff Administrator and the Quality Management department. These issues are referred to as Adverse Events and include issues related to medical and behavioral health care and services provided to members.

1. An Adverse Event is an untoward event with a less-than-optimal outcome.
2. CM staff report the following adverse events for potential evaluation by the Medical Director under policy CM.ADM. 018
 - a. Unplanned hospital readmission within 10 days
 - b. Unplanned return to the operating room during the same hospital admission;
 - c. Unexplained in-hospital deaths
 - d. Trauma or injury suffered while in a healthcare facility/practitioner office/HMO site
 - e. Surgery on a wrong body part
 - f. Surgery on wrong patient
 - g. Loss of function not related to illness or condition
 - h. Rape in 24-hour care facility
 - i. Suicide in 24-hour care facility
 - j. Infant abduction or discharge to wrong family
 - k. Hemolytic transfusion reaction related to wrong blood type of incompatible blood products