

Regular Meeting of the

# Santa Clara County Health Authority Utilization Management Committee

Wednesday, January 19, 2022, 6:00 PM – 7:30 PM Santa Clara Family Health Plan 6201 San Ignacio Ave., San Jose, CA 95119

# Via Zoom

(669) 900-6833 Meeting ID: 813 0158 9719 Passcode: **umc012022** <u>https://us06web.zoom.us/j/81301589719</u>

# AGENDA

1. Introduction		Dr. Lin	6:00	5 min
2. Public Comment Members of the public may speak two minutes per speaker. The con limit the duration of public comme	mmittee reserves the right to	Dr. Lin	6:05	5 min
<ol> <li>Meeting Minutes         Review minutes of the Q4 Octobe Management Committee (UMC) m Possible Action: Approve Q4 2     </li> </ol>	neeting.	Dr. Lin	6:10	5 min
<ol> <li>Chief Executive Officer Update Discuss status of current topics an</li> </ol>	d initiatives.	Ms. Tomcala	6:15	5 min
<ol> <li>Chief Medical Officer Update         <ul> <li>General Update</li> <li>Annual Confidentiality Agreem</li> </ul> </li> </ol>	nents	Dr. Nakahira	6:20	10 min
<ul> <li>Old Business Update</li> <li>a. COVID-19 Reporting</li> </ul>		Dr. Boris	6:30	5 min
. UM Program Description – 2022 Annual review of UM Program Des Possible Action: Approve UM	scription.	Dr. Boris	6:35	5 min
B. BHT Program Description - 2022 Annual review of BHT Program De Possible Action: Approve BHT	escription.	Ms. McKelvey	6:40	5 min
<ul> <li>Annual Review of UM Policies</li> <li>a. HS.01 Prior Authorization</li> <li>b. HS.02 Medical Necessity Crite</li> <li>c. HS.03 Appropriate Use of Prov</li> </ul>		Dr. Huynh	6:45	5 min
ta Clara County Health Authority zation Management Committee Regular Me	eting January 19, 2022	2	Page <b>1</b> of <b>2</b>	



<ul> <li>d. HS.04 Denial of Services Notification</li> </ul>			
e. HS.05 Evaluation of New Technology			
f. HS.06 Emergency Services			
g. HS.07 Long-Term Care Utilization Review			
h. HS.08 Second Opinion			
i. HS.09 Inter-Rater Reliability			
j. HS.10 Financial Incentive			
<b>k.</b> HS.11 Informed Consent			
I. HS.12 Preventive Health Guidelines			
<b>m.</b> HS.13 Transportation Services			
n. HS.14 System Controls			
<b>Possible Action:</b> Approve annual review of UM policies.			
10. Care Coordinator Guidelines	Mr. Perez	6:50	5 min
a. Review of New Care Coordinator Guidelines			
b. Community Based Adult Services (CBAS)			
Possible Action: Approve Care Coordinator Guidelines.			
11. Reports			
a. Membership	Dr. Boris	6:55	10 min
<b>b.</b> Over/Under Utilization by Procedure Type/Standard UM			
Metrics			
c. Dashboard Metrics	Mr. Perez	7:05	5 min
• Turn-Around Time – Q4 - 2021			
d. Cal MediConnect and Medi-Cal Quarterly Referral Tracking –	Ms. Vu	7:10	5 min
<ul> <li>d. Cal MediConnect and Medi-Cal Quarterly Referral Tracking – Q4 – 2021</li> </ul>	Ms. Vu	7:10	5 min
Q4 – 2021	Ms. Vu	7:10	5 min
, , ,	Ms. Vu	7:10	5 min
Q4 – 2021 <b>e.</b> Quality Monitoring of Plan Authorizations and Denial Letters (HS.04.01) – Q4 2021	Ms. Vu Dr. Huynh	7:10 7:15	5 min 5 min
Q4 – 2021 <b>e.</b> Quality Monitoring of Plan Authorizations and Denial Letters (HS.04.01) – Q4 2021		-	
Q4 – 2021 e. Quality Monitoring of Plan Authorizations and Denial Letters (HS.04.01) – Q4 2021 f. Delegation Oversight Dashboard	Dr. Huynh	7:15	5 min
Q4 – 2021 e. Quality Monitoring of Plan Authorizations and Denial Letters (HS.04.01) – Q4 2021 f. Delegation Oversight Dashboard g. Annual Physician Peer-to-Peer (HS.02.02) – 2021	Dr. Huynh Dr. Boris	7:15 7:20	5 min 5 min

Next Meeting: Wednesday, April 20, 2022 at 6:00 p.m.

LIC 04 Devial of Comission Notification

#### Notice to the Public—Meeting Procedures

- Persons wishing to address the Utilization Management Committee on any item on the agenda are requested to advise the Recorder so that the Chairperson can call on them when the item comes up for discussion.
- The Committee may take other actions relating to the issues as may be determined following consideration of • the matter and discussion of the possible action.
- In compliance with the Americans with Disabilities Act, those requiring accommodations in this meeting should • notify Amy O'Brien 48 hours prior to the meeting at (408) 874-1997.
- To obtain a copy of any supporting document that is available, contact Amy O'Brien at (408) 874-1997. Agenda ٠ materials distributed less than 72 hours before a meeting can be inspected at the Santa Clara Family Health Plan offices at 6201 San Ignacio Ave, San Jose, CA 95119.
- This agenda and meeting documents are available at www.scfhp.com. •



# Public Comment



Meeting Minutes October 20, 2021



Regular Meeting of the

# Santa Clara County Health Authority Utilization Management Committee

Wednesday, October 20, 2021 6:00 – 7:30 PM Santa Clara Family Health Plan 6201 San Ignacio Ave, San Jose, CA 95119

# **Minutes - Draft**

# Members Present

Jimmy Lin, M.D., Internal Medicine, Chair Ali Alkoraishi, M.D., Psychiatry Ngon Hoang Dinh, OB/GYN Laurie Nakahira, D.O., Chief Medical Officer Habib Tobbagi, PCP, Nephrology Indira Vemuri, Pediatric Specialist

## Members Absent

Dung Van Cai, D.O., Head & Neck

Staff Present

Natalie McKelvey, Manager, Behavioral Health Luis Perez, Supervisor, Utilization Management Hoang Mai Vu, Utilization Management & Discharge Planning Nurse Amy O'Brien, Administrative Assistant

# 1. Roll Call

Jimmy Lin, MD, Chair, called the meeting to order at 6:08 p.m. Roll call was taken and a quorum was established.

# 2. Public Comment

There were no public comments.

#### 3. Meeting Minutes

The minutes of the July 21, 2021 Utilization Management Committee (UMC) meeting were reviewed.

It was moved, seconded, and the minutes of the July 21, 2021 UMC meeting were unanimously approved.

Motion:Dr. TobbagiSeconded:Dr. AlkoraishiAyes:Dr. Alkoraishi, Dr. Lin, Dr. Nakahira, Dr. Tobbagi, Dr. VemuriAbsent:Dr. Cai, Dr. Dinh

# 4. Chief Executive Officer Update

This item was addressed during the Chief Medical Officer update.

#### 5. Chief Medical Officer Update

#### a. General Update

Dr. Laurie Nakahira, Chief Medical Officer, gave the Chief Executive Officer update. The CalAIM Enhanced Case Management (ECM) and In-Lieu-of Services (ILOS) programs will roll-out on January 1, 2022. The Medi-Cal Rx carve-out will also begin on January 1, 2022. The Blanca Alvarado Community Resource Center (CRC) held a soft Grand Opening in September and there are virtual classes and services available. The



pop-up vaccination clinics will continue at the CRC. SCFHP is continuing to develop the programming and anticipating a formal Grand Opening with in-person classes, programs, and services.

Dr. Nakahira continued with the Chief Medical Officer update, and she discussed the COVID vaccine disparity project. There is a 20% gap between residents of the County of Santa Clara, with an almost 90% vaccination rate, and SCFHP plan membership, with a 20% lower vaccination rate. The COVID vaccine disparity project will work to close this gap. Dr. Lin remarked that he does not see his patients in person unless they are fully vaccinated. Dr. Nakahira agreed, and the Plan is encouraging members to either attend a drive-through vaccination clinic, or to get a vaccination at their pharmacy when they pick up their regular medications.

#### b. Cal MediConnect NCQA Audit Timeline

Dr. Nakahira advised the committee that the Plan is currently preparing for the National Committee for Quality Assurance (NCQA) resurvey audit for our Cal MediConnect (CMC) line of business. The onsite portion of the audit runs from January 31, 2022 through February 1, 2022.

#### 6. Old Business/Follow-Up Items

#### a. General Old Business

There was no general old business to discuss this evening.

#### b. Plan All-Cause Readmissions Rates Due to COVID-19

Hoang Mai Vu, Utilization Management and Discharge Planning Nurse, gave an overview of the impact of COVID on the CY2020 Plan All-Cause Readmissions (PCR) rates. Ms. Vu explained that the majority of COVID admissions for our CMC members occurred at O'Conner Hospital and Regional Medical Center. These indicators represent approximately 10.50% of the total PCR rates for the year 2020. The majority of COVID admissions for our Medi-Cal (MC) members occurred at Regional Medical Center and Valley Medical Center. These indicators represent approximately 9.55% of the total PCR rates for the year 2020.

Dr. Lin asked about the number of deaths due to COVID. Ms. Vu responded that she does not have this information available at this time. She will research this information and provide the details to Dr. Lin in a follow-up email.

#### 7. Summary of DMHC Final Report - 2020

Ms. Vu summarized the findings of the DMHC Final Report for Routine Survey of 2020. Ms. Vu explained that two deficiencies were found. Deficiency #1 found that the Plan did not conduct adequate oversight of its delegates to ensure compliance with UM denial letter requirements. This deficiency was corrected as of August 2021. Deficiency #2 found that the Plan did not provide evidence that post-stabilization medical care is deemed authorized if the request is not approved within 30 minutes. Ms. Vu highlighted the processes and procedures that were put in place to correct these deficiencies.

#### 8. UM Delegate Oversight Matrix Dashboard

Ms. Vu presented the results of the UM department's Prior Authorization (PA) delegation oversight from March through September of 2021. Ms. Vu explained that these results were impacted by COVID, as well as by staff attrition. One deficiency noted was that templates for members' threshold languages were not correctly used, as there was no criteria listed as the basis for a decision. Another common deficiency was the lack of direct phone numbers for peer-to-peer reviews. Ms. Vu advised that, going forward, there should be more consistent results by the time of our January 2022 meeting.

#### 9. Inter-Rater Reliability (IRR) BH Report - 2021

Natalie McKelvey, Manager, Behavioral Health (BH), presented the results of the BH IRR testing conducted in September 2021. Ms. McKelvey explained that all staff members passed the tests. As of September 2021, the Plan's 2 medical directors and the Chief Medical Officer were also included in the testing process.



#### 10. Medical Covered Services Prior Authorization (PA) Grid

Ms. Vu highlighted the minor change to the Medical Covered Services PA Grid. Ms. Vu explained that under the category of 'Outpatient Services and Procedures', endoscopy has been updated to include 'All types of endoscopy except colonoscopy and nasal endoscopy'.

Dr. Lin asked how many of our members requested gender reassignment, and how the Plan compares to private sector plans such as Blue Cross and Blue Shield. Ms. Vu and Dr. Nakahira responded that it is a relatively small number of our members that request gender reassignment. Dr. Nakahira will work with Dr. Boris to research this topic and discuss their findings at our January 19, 2022 meeting.

It was moved, seconded, and the Medical Covered Services PA Grid was unanimously approved.

Motion:Dr. AlkoraishiSeconded:Dr. NakahiraAyes:Dr. Alkoraishi, Dr. Lin, Dr. Nakahira, Dr. Tobbagi, Dr. VemuriAbsent:Dr. Cai, Dr. Dinh

#### 11. Reports

a. Membership

Dr. Nakahira gave a brief summary of the Membership Report from October 2020 through October 2021. Our CMC membership continues to grow with 10,368 members as of October 2021. This is largely due to the pause on MC redeterminations due to COVID-19. The Plan is waiting for the Department of Healthcare Services (DHCS) to advise when they will resume the MC redeterminations process. Dr. Nakahira explained that there is an error in the total number of MC members as of October 2021. Our total MC membership is not 554,334. The Plan's total MC membership is 277,130 members, an increase of approximately 1,000 members from September 2021, and approximately 20,000 members from October 2020.

**b.** Over/Under Utilization by Procedure Type/Standard UM Metrics

Dr. Nakahira presented the Committee with the UM objectives and goals. Dr. Nakahira advised that these metrics cover the period from December 1, 2020 through September 30, 2021. Dr. Nakahira gave a summary of the data for the Plan's MC SPD line of business. The number of discharges per thousand is 13.50, with an average length of stay of 5.43 days. Dr. Lin asked if these numbers are comparable to other counties, such as Los Angeles county. Dr. Nakahira replied that these numbers are used as a benchmark of where the Plan stands at this time. The UM department will research this information in comparison to other counties, and present it during the January 19, 2022 meeting. Dr. Nakahira continued with a summary of the data for the Plan's MC non-SPD line of business. The number of discharges per thousand is 3.78, with an average length of stay of 4.30 days.

Dr. Nakahira then gave a summary of the data for the Plan's CMC line of business. The number of discharges per thousand is 18.20, with an average length of stay of 5.71 days. This line of business includes a more high risk population.

Dr. Nakahira continued with a comparison of the inpatient utilization rates for the Plan's MC non-SPD and SPD populations. Dr. Nakahira also summarized the inpatient readmissions rates for the MC lines of business. The 10.47% increase in the readmission rate may have been impacted by COVID-19. The UM department has a plan in place to decrease the admissions and readmissions rates. Dr. Lin asked what the goal is, and Dr. Nakahira responded that the goal is actually 7%. This has been a real challenge, as the number of preventive care visits was impacted by COVID. Dr. Nakahira continued her summarization with a discussion of inpatient readmissions rates for the Plan's CMC line of business. This data does not cover a full year.

Dr. Nakahira concluded with an overview of the ADHD MC BH metrics. The UM department hopes to continue to increase these rankings through increased telehealth, primary care, and behavioral health care visits. The antidepressant medication management measures are on track for 2021. It has been a challenge



to meet the rankings for the cardiovascular measures. Dr. Lin asked for a definition of the 10<sup>th</sup> percentile, and Dr. Nakahira explained how the rankings are determined and what they mean.

Dr. Alkoraishi asked why these measures do not include schizophrenia, schizoaffective disorder, and bipolar 1 disorder. Dr. Nakahira responded that these measurements are driven by NCQA criteria. Ms. McKelvey added that, for this particular Healthcare Effectiveness Data and Information Set (HEDIS) health metric, the Plan looked only at schizophrenia during the first year. Thereafter, the Plan did open it up to all schizophrenia types, not including bi-polar disorder. In order to meet NCQA requirements, the Plan is trying interventions to help increase these scores; however, HEDIS is specific to the schizophrenia diagnosis. Dr. Lin asked if the Plan will be able to capture prescription data for anti-depressant medication, and Ms. McKelvey responded that the Plan will have access to pharmacy data.

#### c. Dashboard Metrics

• Turn-Around Time – Q3 2021

Mr. Perez summarized the CMC Turn-Around Time metrics for Q3 2021. The turn-around times in all categories are compliant at 98.7% or better, with many categories at 100%. Dr. Lin asked for clarification of the Part C categories. Mr. Perez replied that those are outpatient services and procedures. Mr. Perez confirmed for Dr. Lin that Part B means Medicare Part B drugs. Mr. Perez next summarized the MC Turn-Around Time metrics for Q3 2021. The turn-around times in the majority of MC categories are compliant at 98.3% or better. In the category of Provider Notification of UM decisions within 24 hours, August fell slightly short at 96.8%, which brought Q3 down to 97.9%. Mr. Perez explained this last category includes the work that occurs at the end of the authorization process, and the Plan's goal is to achieve 100% in all categories each quarter.

Dr. Dinh joined the meeting at 6:48 p.m.

d. Cal MediConnect and Medi-Cal Quarterly Referral Tracking – Q3 2021

Ms. Vu summarized the data from the Q3 2021 CMC Quarterly Referral Tracking report for the Committee. This report covers the period from July 1, 2021 through September 30, 2021. Ms. Vu explained that, for Q3 2021, the Plan approved 800 more services than Q2 2021. The Plan is 7% higher than last quarter for remaining unclaimed services.

Ms. Vu continued and summarized the data from the Q3 2021 MC Quarterly Referral Tracking report. Ms. Vu explained that there were a significant number of unclaimed hospital services. Dr. Lin asked why this number is so high. Ms. Vu explained that it is likely these were elective procedures. The Plan approves elective procedures for a period of 3 months. It is possible these procedures have not yet occurred. In Q3 2021, the Plan approved 1,300 more services than Q2 2021. The Plan is 8% higher than last quarter for remaining unclaimed services.

Dr. Lin asked if the Plan uses auto-approval or if staff individually approves these. Ms. Vu clarified that the Plan does not do auto-approvals. Care coordinators, nurses, or medical directors review and approve services. Ms. Vu also clarified that the grand total represents all services combined.

Dr. Tobaggi asked how many times the Plan errs on the side of approval to avoid problems if services are denied. Dr. Nakahira explained that medical directors review approvals, and disapprovals, on a regular basis. Only the medical directors can deny services. Staff members are not incentivized to issue approvals for services. Dr. Nakahira emphasized that, regardless of the service, all medical criteria must be met as per the standards of care guidelines.

e. Quality Monitoring of Plan Authorizations and Denial Letters (HS.04.01) - Q3 2021

Ms. Vu presented the results of the Q3 2021 Quality Monitoring of Plan Authorizations and Denial Letters from July 1, 2021 through September 30, 2021. Ms. Vu reported that the UM department received a 100% score in all categories. All findings are reviewed on a quarterly basis, with oversight by the Plan's medical directors.



#### f. Behavioral Health (BH) UM

Ms. Natalie McKelvey, Manager, BH, gave an overview of the BHT program for the committee. Ms. McKelvey highlighted the screenings that the BH team completed. She also highlighted the number of CMC psychiatric admissions in 2021. Ms. McKelvey pointed out that the 408 BH claims are not only limited to those members who fall into the mild-to-moderate category, but also includes members who need specialty BH services. Medicare does not make a distinction, so she is unable to separate specialty services. Ms. McKelvey continued with the number of CMC unique members who received services. She expected this number to be higher in 2021, and this might be due to the number of in person office visits versus telehealth care.

Kaiser Permanente and VHP are delegated for their BHT services. Kaiser has the highest number of ABA members in treatment, per 1,000 members. The Plan has oversight of the utilization guidelines and criteria for those networks that are not delegated to ensure all kids receive the appropriate treatment and services. Dr. Lin commented that it is good the Plan gives our members plenty of BH support.

#### 12. Adjournment

The meeting adjourned at 7:17 p.m. The next meeting of the Utilization Management Commitment is on January 19, 2022 at 6:00 p.m.

Jimmy Lin, M.D, Chair Utilization Management Committee Date



# Chief Executive Officer Update



Chief Medical Officer Update General Update/Annual Confidentiality Agreements



Old Business Update COVID-19 Reporting



# MEMBER COVID-19 RELATED DECEASED NUMBER





UM Program Description



Santa Clara Family Health Plan

# Utilization Management Program Description

202<mark>2</mark>4



Introduction	4
Section I. Program Objectives & Principles	5
Section II. Program Structure	7
A. Program Authority	7
B. UM Committee	7
C. The Quality Improvement Committee	
D. Health Services Department	9
1. Communication Services	9
2. Roles	9
E. UM Program Evaluation	
F. Quality Improvement Integration	
1. Quality Improvement UM Program activities:	
2. UM Data Sources	
3. Utilization Management Performance Monitoring	
G. Appeal Procedures	
H. Delegation of Utilization Management Activities	
Section III. Program Scope, Processes & Information Sources	
A. Clinical Review Criteria	
1. Adoption of criteria	
2. Hierarchy of criteria	
B. Medical Necessity	
1. Medical Necessity Determinations	
2. Inter-Rater Reliability	
C. Timeliness of UM Decisions	
D. Clinical Information	
E. Transplants	
F. New Technology Assessment	
G. Emergency Services/Post-Stabilization Care	
H. Determination Information Sources	
I. Health Services	
1. Utilization Determinations	
a) Prospective Review	
b) Concurrent Review	
c) Retrospective Review	
d) Standing Referrals	
e) Terminal Illness	
f) Communications	
g) Referral Management	
1. In-network	
2. Emergency Services	
3. Out of Network	



	4. Specialist Referrals	
	5. Tertiary Care Services	
	6. Second Opinions	
	7. Predetermination of Benefits/Outpatient Certification	
I	h) Discharge Planning	
i	i) UM Documents	
J.	Behavioral Health Management	
1	L. Behavioral Health Integration	
2	-	
3	3. The referral procedure for SCFHP members includes	
К.	Pharmacy Management	
L.	Long Term Support Services	
М.	Confidentiality	
N.	Annual Evaluation	Error! Bookmark not defined.
	Interdepartmental collaboration	



# Introduction

Santa Clara Family Health Plan (SCFHP) has implemented a Utilization Management (UM) Plan consistent with Medicare regulations, the National Committee for Quality Assurance (NCQA) standards, the California Department of Health Care Services (DHCS) and Department of Managed Health Care (DMHC) requirements to measure and monitor processes to improve the effectiveness, efficiency, and value of care and services provided to the members of SCFHP. SCFHP has a well-structured UM program and makes utilization decisions affecting the health care of members in a fair, impartial and consistent manner.

The UM program description is reviewed and approved by the SCFHP Utilization Management Committee (UMC) annually. SCFHP may provide recommendations for Quality Improvement (QI) activities to improve the comprehensive UM program. The SCFHP Chief Medical Officer or a medical director is involved in all UM activities, including implementation, supervision, oversight and evaluation of the UM Program. To assess the effectiveness of the UM program and to keep UM processes current and appropriate, SCFHP annually evaluates the UM Program for:

- 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 in the program.
- Member and provider experience data

#### Santa Clara Family Health Plan (SCFHP) Background

Santa Clara Family Health Plan (SCFHP) is a local, public, not-for-profit health plan dedicated to improving the health and well-being of the residents of Santa Clara County. Our mission is to provide high quality, comprehensive health care coverage for those who do not have access to, or are not able to purchase, good health care at an affordable price. Working in partnership with providers, we act as a bridge between the health care system and those who need coverage. We do this by offering comprehensive, affordable medical, dental and vision coverage through our health insurance programs: Medi-Cal, a public insurance program, and Cal MediConnect, a program for individuals with both Medi-Cal and Medicare.

Since 1997, SCFHP has partnered with providers to deliver high-quality health care to our members. Through dedication to integrity, outstanding service, and care for our community, we work to ensure that everyone in our county can receive the care they need for themselves and for their families. We currently serve approximately 250,000 residents of Santa Clara County including over 8,000 of these members in the Cal MediConnect program.

# **Section I. Program Objectives & Principles**

- A. The purpose of the SCFHP Utilization Management (UM) Program is to objectively monitor and evaluate the appropriateness of utilization management services delivered to members of SCFHP. The UM Program addresses the following information about the UM structure:
  - 1. Guide efforts to support continuity and coordination of medical services
  - 2. Define UM staff members' assigned activities, including defining which of the UM staff has the authority to deny medical necessity coverage
  - 3. Address process for evaluating, approving and revising the UM program and supporting policies and procedures
  - 4. Define the UM Program's role in the QI Program, including how SCFHP collects UM information and uses it for QI related activities
  - 5. Improve health outcomes
  - 6. Support efforts that are taken to continuously improve the effectiveness and efficiency of healthcare services
- B. The SCFHP maintains the following operating principles for the UM Program:
  - 1. UM decisions are made on appropriateness of care and service, as well as existence of benefit coverage
  - Appropriate processes are used to review and approve provision of medically necessary covered services and are based on SCFHP policies and procedures through established criteria
  - 3. The SCFHP does not financially reward clinicians or other individuals for issuing denials of coverage, care, or service
  - 4. The SCFHP does not encourage UM decisions that result in under-utilization of care by members
  - 5. Members have the right to:
    - a) Participate with providers in making decisions about their individual health care
    - b) Discuss candidly with providers the appropriate or medically necessary treatment options for their conditions, regardless of cost or benefit coverage
  - 6. The UM program and the utilization review policies and procedures are available to Members and Providers
  - SCFHP policies and procedures shall cover how Contractors, Subcontractors, or any contracted entity, authorize, modify, or deny health care services via Prior Authorization, concurrent authorization, or retrospective authorization, under the benefits provided by SCFHP
  - 8. SCFHP policies, processes, strategies, evidentiary standards, and other factors used for UM or utilization review are consistently applied to medical/surgical, mental health, and substance use disorder services and benefits.
  - SCFHP notifies contracting health care Providers, as well as Members and Potential Enrollees upon request, of all services that require Prior Authorization, concurrent authorization or retrospective authorization and ensure that all contracting health care

Providers are aware of the procedures and timeframes necessary to obtain authorization for these services.

- 10. SCFHP conducts all UM activities in accordance with CA Health and Safety Code 1367.01
- 11. SCFHP conducts their prior authorization requirements and complies with the requirements for parity in mental health and substance use disorder benefits in 42 CFR 438.910(d)

## **Section II. Program Structure**

#### A. Program Authority

1. Board of Supervisors and the Board of Directors

The Santa Clara County Board of Supervisors appoints the Board of Directors (BOD) of SCFHP, a 12-member body representing provider and community partner stakeholders. The BOD is the final decision making authority for all aspects of SCFHP programs and is responsible for approving the Quality Improvement and Utilization Management Programs. The Board of Directors delegates oversight of Quality and Utilization Management functions to the SCFHP Chief Medical Officer (CMO) and the Quality Improvement Committee (QIC) and provides the authority, direction, guidance, and resources to enable SCFHP staff to carry out the Utilization Management Program. Utilization Management activities are the responsibility of the SCFHP staff under the direction of the SCFHP Chief Medical Officer.

#### 2. Committee Structure

The Board of Directors appoints and oversees the QIC, which, in turn, provides the authority, direction, guidance, and resources to the UMC to enable SCFHP staff to carry out the Quality Improvement and Utilization Management Programs.

SCFHP UMC meets quarterly in accordance with the SCFHP bylaws and more frequently when needed. Committee meeting minutes are maintained to summarize committee activities and decisions, and are signed and dated. The QIC provides oversight, direction and makes recommendations, final approval of the UM Program.

#### B. The Utilization Management Committee (UMC)

- 1. Composition, roles, goals, meetings, and additional information will be found in the UM Committee Charter.
- 2. Responsibilities of the UM Committee
  - a) Develop, maintain, and execute an effective utilization review and management plan to manage the use of hospital resources in a manner that is efficient and cost effective.
  - b) The Director of Utilization Management shall review the utilization review and management plan annually and revise it as necessary.
  - c) Provide oversight for review and utilization of:
    - i. Ancillary services
    - ii. Medical necessity of admissions
    - iii. Extended length of stay and high cost cases
    - iv. Cases of non-covered stays
    - v. Short stay inpatient stays
    - vi. Observation cases.

- d) Verify that utilization management functions meet the standards and requirements of all licensing and regulatory agencies, accrediting bodies, third party payers, and external review agencies.
- e) Verify that admissions and discharges are appropriate using well-defined criteria.
- f) Review and analyze data from the hospital-wide best practice/pathway activities, case mix index, denials, appeals/recoveries, and other sources and make recommendations for actions based on the findings.
- g) Establish and approve criteria, standards, and norms for pre-admission reviews, continued stay reviews, and assist in continuing modification of such criteria, standards, and norms.
- h) Recommend changes in patient care delivery if indicated by analysis of review findings.
- i) Promote the delivery of quality patient care, according to developed or adopted criteria, in an efficient and cost-effective manner.
- j) Refer quality concerns identified during the review process to the Quality and Compliance departments as needed for evaluation and action.
- 3. Conflict of Interest

No person who holds a direct financial interest in an affiliated health care entity is eligible for appointment to the Utilization Management Committee. SCFHP does not consider employment by the Plan to constitute a direct financial interest in an affiliated entity. No committee member may participate in the review of a case in which either he or she or any of his or her professional associates have been professionally involved, except to provide additional information as requested.

# C. The Quality Improvement Committee (QIC)

- 1. Functional responsibilities for the UM Program
  - a) Annual review, revision and approval of the UM Program Description
  - b) Oversight and monitoring of the UM Program, including:
    - a. Review and approval of the sources of medical necessity criteria
    - b. Recommend policy decisions
    - c. Monitor for over and under-utilization of health services
    - d. Design and implement interventions to address over and under-utilization of health services
    - e. Guide studies and improvement activities
    - f. Oversight of annual program evaluation and review
    - g. Review results of improvement activities, HEDIS measures, other studies and profiles and recommend necessary actions

#### D. Health Services Department

The Health Services Department at SCFHP is responsible for coordination of programs including the UM Program. The UM staff administer the UM Program. Non-clinical staff may receive and log utilization review requests in order to ensure adequate information is present. Some utilization requests are approved by the non-clinical staff. Appropriately qualified and trained clinical staff use evidence-based criteria or generally accepted medical compendia and professional practice guidelines to conduct utilization reviews and make UM determinations relevant to their positions and their scope. Potential denials are referred to licensed physicians and pharmacists for review. The CMO and Medical Director (MD), conduct reviews that require additional clinical interpretation or are potential denials. The medical directors apply medical necessity criteria that are reviewed and adopted on an annual basis. The CMO or qualified designee, including medical directors and pharmacists, are the only staff members that make medical necessity and coverage denial decisions.

#### **1.** Communication Services

The UM Staff shall provide the following communication services for members and practitioners:

- a) UM personnel are available during normal business hours for inbound collect or toll-free calls regarding UM issues. The UM Department shall operate during normal health plan business hours.
- b) Telephone lines are staffed with individuals who have access to most information/resources needed to provide a timely response. Callers have the option of leaving a voice mail message either during or after business hours
- c) UM staff can receive inbound communication regarding UM issues after normal business hours. These calls are returned promptly the same or next business day.
- d) UM staff are identified by name, title and organization name when initiating or returning calls regarding UM issues
- e) The UM department has both local and toll-free telephone and telefax numbers and offers TDD/TTY services for deaf, hard of hearing or speech impaired members. Language assistance/interpretation is also available for members to discuss UM issues at no cost to the member

#### 2. Roles / UM Staff Assigned Activities

a) Chief Medical Officer (CMO)

The Chief Medical Officer is a physician who holds an active, unrestricted California license and is designated with responsibility for development, oversight and implementation of the UM Program. The CMO shall serves as a voting committee member of the QIC, and makes periodic reports of committee activities, UM Program activities and the annual program evaluation to the BOD. The CMO works collaboratively with SCFHP community partners to continuously improve the services that the UM Program provides to members and providers. The CMO is the senior level physician for medical determinations and his/her role includes:

- Setting UM medical policies
- Supervising operations
- Reviewing UM cases
- Participating in UMC
- Evaluation of the UM program
- b) Medical Directors (MD)

The Medical Directors are licensed physicians with authority and responsibility for providing professional judgment and decision making regarding matters of UM. Medical Director responsibilities include, but are not limited to, the following:

- Support processes where medical decisions are rendered by, and are not influenced by fiscal or administrative management considerations. The decision to deny services based on medical necessity is made only by Medical Directors
- 2. Ensure that the medical care provided meets the standards of practice and care
- 3. Ensure that medical protocols and rules of conduct for plan medical personnel are followed
- 4. Develop and implement medical policy.
- 5. A medical director is designated to be involved with UM activities, including implementation, supervision, oversight and evaluation of the UM program
- 6. Any changes in the status of the CMO or Medical Directors shall be reported to the Department of Health Care Services (DHCS) within ten calendar working days of the change.
- 7. The SCFHP may also use external specialized physicians to assist with providing specific expertise in conducting reviews. These physicians hold current, unrestricted licenses in the state of California and are board-certified by the American Board of Medical Specialties (ABMS) or the American Osteopathic Association (AOA) in specific areas of medical expertise. The CMO is responsible for managing access and use of the panel organization of specialized physicians. An example of external specialist physicians would be psychiatry or psychology for making determinations regarding mental health care.

# c) UM Director and UM Manager

The UM Director and UM Manager are responsible for the day-to-day management of the UM department, the overall UM Department operations and for coordination of services between other departments. These responsibilities include:

- Develop and maintain the UM Program in collaboration with the Medical Director and other Health Services leadership including Behavioral Health, Case Management, Long Term Support Services (LTSS), Pharmacy, and Quality.
- 2. Coordinate UM activities with other SCFHP units.
- 3. Maintain compliance with the regulatory standards and requirements.
- 4. Monitor utilization data for over and under utilization.
- 5. Coordinate interventions with Medical Director(s) and staff to address under and over utilization concerns when appropriate.
- 6. Monitor utilization data and activities for clinical and utilization studies.
- 7. Maintain professional relationships with colleagues from other Medi-Cal Managed Care Plans and community partners, sharing information about requirements and successful evaluation strategies
- 8. Implement the annual UM Program evaluation and Member and Provider Satisfaction Surveys
- d) UM Supervisor

Responsible for the daily operational management of the UM department activities, including: authorization processing, letter creation, provider outreach and education, productivity and quality monitoring oversight, training and development, and the daily supervision of non-clinical UM Care Coordinators.

e) Pharmacy Director

The Pharmacy Director, or designee, is a unrestricted California licensed pharmacist (RPh) responsible for coordinating daily operations, and revewing and managing pharmacy utilization reports to identify trends and patterns. The Pharmacy Director provides clinical expertise relative to the Pharmacy, Quality, and Utilization Management components of SCFHP management. The scope of responsibilities of the Pharmacy Director includes:

- Render pharmaceutical service decisions (approve, defer, modify or deny) pursuant to criteria established for the specific line of business by the CMO and the SCFHP Pharmacy and Therapeutics Committee or generally accepted medical compendia and professional practice guidelines
- Assure that the SCFHP maintains a sound pharmacy benefits program and oversee the functions that DHCS still holds SCFHP responsible in the post-transition to Medicaid RX. Manage the medical pharmacy benefit in Medi-Cal that is not carved out to DHCS-
- 3. Manage the SCFHP Formulary on an ongoing basis by Line of Business
- 4. Manage the Drug Utilization Review program
- 5. Monitor compliance with delegation requirements and the performance of the Pharmacy Benefits Management
- 6. Provide clinical expertise and advice for the on-going development of pharmacy benefits.

- 7. Review medication utilization reports to identify trends and patterns in medication utilization
- 8. Develop and manage provider and client education programs to improve medication prescribing patterns and to increase patient compliance
- 9. Ensure compliance with Federal and State regulatory agencies
- 10. Manage the contract with, and delegated activities of, the pharmacy benefits management organization
- f) Utilization Review and Discharge Planning Registered Nurses

Registered Nurses, with an unrestricted California license, are responsible for the review and determinations of medical necessity coverage decisions. Nurses may provide prospective, concurrent and retrospective inpatient or outpatient medical necessity coverage determinations using established and approved medical criteria, tools and references as well as their own clinical training and education. Utilization Review Nurses also work collaboratively with case managers and assist with member discharge planning. All cases that do not satisfy medical necessity guidelines for approval are referred to a Medical Director for final determination. The CMO or Medical Director(s) are available to the nurses for consultation and to make medical necessity denials.

# g) Utilization Management Review Nurse

Under the guidance and direction of the UM Manager or UM Director, Registered Nurses or Licensed Vocational Nurses are responsible for performing prospective and retrospective preservice clinical review for inpatient and outpatient authorization requests in compliance with all applicable state and federal regulatory requirements, SCFHP policies and procedures, and applicable business requirements. Following regulatory or evidence-based guidelines, the nurses assess for medical necessity of services and/or benefit coverage which result in approved determination for services or the need to collaborate with Medical Directors for potential denial considerations.

h) Non-Clinical Staff

Non-clinical staff in multiple roles perform a variety of basic administrative and operational functions. Clinical staff provides oversight to the non-clinical staff. Roles and responsibilities include:

- 1. Processing selected approvals that do not require clinical interpretation as indicated in the Care Coordinator Guidelines
- 2. Complete intake functions with the use of established scripted guidelines.
- 3. Assists with mailings and data collection
- i) Behavioral Health Staff Assigned Activities
  - 1. Medical Director or CMO
    - i. Reviews denials, changes in requested service.

- a) If there is a change in the authorization request for a behavioral health related inpatient or partial hospitalization stay for a member, this is considered a denial. The denial will be reviewed by the SCFHP MD or CMO who shall consult with a SCFHP psychiatrist as needed.
- ii. Involved in the implementation of the behavioral health care aspects of the UM Program
- iii. Establishes UM policies and procedures relating to behavioral healthcare
- iv. Reviews and decides UM behavioral healthcare cases
- v. Participates in UM Committee meetings
- 2. Psychiatrist
  - i. SCFHP contracts with a board certified psychiatrist to provide consultation and participation in the following:
    - a. Implementation of the behavioral health care aspects of the UM Program
    - b. Establishing UM policies and procedures related to behavioral healthcare
    - c. Participates in UM Committee meetings
    - d. Development and approval of behavioral health criteria
    - e. Review and decides UM behavioral healthcare cases
    - f. Oversight of UM referrals and cases
- 3. Behavioral Health Director or Manager
  - i. The BH Director or Manager is a clinician with the responsibility to facilitate the review of all referrals to the BH department for appropriate triage and assignment. The priority for assignment will be for psychiatrically hospitalized members, frequent emergency room (medical and psychiatric ER), emergent or urgent situations of a life-threatening nature, care coordination with Specialty Mental Health members. All other referrals from internal and external sources will be prioritized as staff time is available.
  - ii. The BH Director or Manager is responsible to oversee Quality Improvement monitoring to continuously assess application of utilization management criteria, turn-around-times, appropriate level of care, etc. The Director or Manager drives compliance with behavioral health related HEDIS measures to support member access to preventive services and management of chronic conditions.
- 4. Behavioral Health Case Manager (s)
  - The BH case manager will review all psychiatric hospitalizations and partial hospitalizations for medical necessity and to provide coordination of care upon discharge. The BH case manager will contact the hospital case manager to

ensure that a plan is developed for aftercare. If the hospitalization is reviewed retrospectively, the BH case manager will contact the member or member's parents to arrange for coordination of aftercare. The BH case manager will work to ensure that members receive follow-up care by a behavioral health practitioner within 30 days following a hospital discharge.

## j) Pharmacy Staff

SCFHP staff is composed of clinical pharmacist(s), pharmacy technician(s), and medical director(s). Pharmacy staff roles and responsibilities include but are not limited to:

- 1. Review of all prior authorization requests for non-formulary medication therapy
- 2. Delegation oversight of the Pharmacy Benefit Manager
- 3. Quality Improvement monitoring to continuously assess application of criteria, turnaround-times, step therapy, etc.
- 4. Provides education to the contracted network staff as necessary
- 5. Drives compliance with medication related HEDIS measures to support member access to preventive services and management of chronic conditions

#### E. UM Program Evaluation

Members of the UM Program management team (CMO, Medical Director, UM and BH Director/Manager) annually evaluate and update the UM Program and develop the annual UM program evaluation to ensure the overall effectiveness of UM Program objectives, structure, scope and processes. The evaluation includes, at a minimum:

- a) Review of changes in staffing, reorganization, structure or scope of the program
- b) Analysis of annual aggregated data related to UM processes and activities
- c) Resources allocated to support the program
- d) Review of completed and ongoing UM work plan activities
- e) Assessment of performance indicators
- f) Review of delegated arrangements activities
- g) Recommendations for program revisions and modifications

The UM management team presents a written program description and program evaluation to the UMC which is then taken to QIC. The QIC reviews and approves the UM Program description and evaluation on an annual basis. The review and revision of the program may be conducted more frequently as deemed appropriate by the QIC, CMO, CEO, or BOD.

The QIC's recommendations for revision are incorporated into the UM Program description, as appropriate, which is reviewed and approved by the BOD and submitted to DHCS, CMS on an annual basis.

#### F. Quality Improvement Integration

The UM Program includes a wide variety of quality assurance activities to support positive member outcomes and continuous quality improvement. The CMO guides these activities in collaboration with

the Director of Compliance with the oversight of the QIC. Performance results are analyzed and reviewed with opportunities for improvement identified for intervention and performance management.

#### 1. Quality Improvement UM Program activities:

- a. HEDIS measurement and reporting
- b. Under and Over Utilization monitoring as exampled by:
  - 1. Readmission rates
  - 2. Access to preventive health services
  - 3. Bed days
  - 4. Length of Stay
- c. Appeal, denial, deferral, modification and grievance monitoring
- d. Provider profile measurement
- e. Potential quality issue referrals
- f. Quality Improvement Work Plan indicators
- g. Quality improvement projects
- h. Inter-rater reliability assessments
- i. Focused ad hoc analyses
- j. Regulatory compliance
- k. Delegation oversight
- I. Member and provider satisfaction with the UM process
- m. Member and provider education
- n. Member notifications for denial reason
- o. UM turnaround times
- p. Nurse Advice Line utilization and trends
- q. Monitoring of groups with shared savings/capitation agreements
  - 1. SCFHP monitors groups with CAP agreements for under-utilization so that members receive optimal care regardless of risk agreement with provider group or plans.

#### 2. UM Data Sources

Sources are used for quality monitoring and improvement activities, including those both directly administered by SCFHP and their delegates

- a. Claims and encounter data
- b. Medical records
- c. Medical utilization data
- d. Behavioral Health utilization data
- e. Pharmacy utilization data
- f. Appeal, denial, and grievance information
- g. Internally developed data and reports
- h. Audit findings
- i. Other clinical or administrative data

Actual unit cost and utilization rates by treatment type category are compared to budgeted and benchmark figures. If any significant over or underutilization trend is noted, additional, more detailed

reports are reviewed. Reports are structured so that they are available on a patient specific, provider or group specific, service specific, or diagnosis specific basis. Data can be reported in summary or at an individual claim level of detail. The utilization reporting system allows for focused problem identification and resolution.

SCFHP's Pharmacy Benefit Coordinator routinely monitors and analyzes pharmacy use in each product line to detect potential underutilization and overutilization. Pharmacy utilization is also monitored by individual physicians and across practice and provider sites. Appropriate clinical interventions and/or other strategies are implemented when required and monitored for effectiveness.

#### 3. Utilization Management Performance Monitoring

a. Areas to monitor

The Director of UM monitors the consistency of the UM staff in handling approval, denial and inpatient decisions. Turnaround time of UM decisions, including verbal and written notification is also monitored. CMO and Medical Director decisions are periodically reviewed by a physician for consistency of medical appropriateness determinations. Telephone service, as related to the percentage of calls that go into the hold queue, abandonment rate and average speed of answer are tracked. Additional monitoring of the UM Program is performed through comments from the Member Satisfaction Survey, the Provider Satisfaction Survey, and the quarterly appeals reports Product-line specific, high level, summary cost and utilization data is reviewed and analyzed monthly but not limited to the following areas:

- 1. Discharges/1,000
- 2. Percentage of members receiving any mental health service
- 3. Hospital outpatient services/1,000
- 4. ED visits/1,000 (not resulting in admission)
- 5. Primary Care visits/1,000
- 6. Specialty Care visits/1,000
- 7. Prescription Drug services
- 8. Denials
- 9. Deferrals
- 10. Modifications
- 11. Appeals

Actual unit cost and utilization rates by treatment type category are compared to budgeted and benchmark figures. If any significant over or underutilization trend is noted, additional, more detailed reports are reviewed. Reports are structured so that they are available on a patient specific, provider or group specific, service specific, or diagnosis specific basis. Data can be reported in summary or at an individual claim level of detail. The utilization reporting system allows for focused problem identification and resolution.

The Plan's Pharmacy Benefit Manager routinely monitors and analyzes pharmacy use in each product line to detect potential underutilization and overutilization. Appropriate clinical

interventions and/or other strategies are implemented when required and monitored for effectiveness.

## b. Access to UM Staff

UM staff is available during normal business hours to answer questions regarding UM decisions, authorization of care and the UM program. The department has both local and toll-free telephone and telefax numbers and offers TDD/TTY services for deaf, hard of hearing or speech impaired members. Language assistance/interpretation is also available for members free of charge to discuss UM issues. Telephone lines are staffed with professionals who have access to most information/resources needed to provide a timely response. Callers have the option of leaving a voice mail message either during or after business hours. These calls are returned promptly the same or next business day. Staff is also a resource for other Plan Departments for UM and Case Management questions.

# G. Appeal Procedures

The SCFHP maintains procedures by which a member, authorized representative and provider can appeal a UM organization determination that results in a denial, termination, or limitation of a covered service. The UM Program procedure for appeals includes provisions for timely and appropriate notification of pre-service, post-service and expedited appeals along with an option for external level review. Appeals are administered in accordance with SCFHP policies and procedures, and regulatory standards.

Detailed information about SCFHP appeal policies and procedures are housed within the appeal and grievance committee and unit.

# H. Delegation of Utilization Management Activities

When SCFHP delegates Utilization Management decisions or other UM related activities, the contractual agreements between the SCFHP and this delegated group specify the responsibilities of both parties; the functions or activities that are delegated; the frequency of reporting on those functions and responsibilities to the SCFHP, how performance is evaluated; and corrective action plan expectations, if applicable. The SCFHP conducts a pre-contractual evaluation of delegated functions to assure capacity to meet standards and requirements. The SCFHP's Delegation Oversight Manager is responsible for the oversight of delegated activities. Delegate work plans, reports, and evaluations are reviewed by the SCFHP and the findings are summarized at QIC meetings, as appropriate. The Delegation Oversight Manager monitors all delegated functions of each of our delegate through reports and regular oversight audits. The QIC annually reviews and approves all delegate UM programs. Depending on the delegated functions the audit may include aspects of the following areas: utilization management, credentialing, grievance and appeals, quality improvement and claims.

As part of delegation responsibilities, delegated providers must:

• Develop, enact, and monitor a UM Program description that addresses all State, Federal, health plan and accreditation requirements.

- Provide encounter information and access to medical and behavioral health records pertaining to SCFHP members.
- Provide a representative to the QIC.
- Submit quarterly reports, annual evaluations, and work plans.
- Cooperate with annual audits and complete any corrective action judged necessary by the SCFHP.

SCFHP does not delegate the management of complaints, grievances and appeals. SCFHP conducts a pre-delegation review to measure resources of the potential delegate

# Section III. Program Scope, Processes & Information Sources

The UM Program consists of comprehensive and systematic functions, services, and processes that provide care management to members, and include medical necessity determinations regarding the appropriateness of health care services in accordance with definitions contained in the member certificate of coverage. The UM Program also encompasses delegated utilization management functions, activities, and processes for behavioral health and pharmacy services.

## A. Clinical Review Criteria

The UM Program is conducted under the administrative and clinical direction of the CMO and UMC. Therefore, it is SCFHP's policy that all medical appropriateness and necessity criteria are developed, and approved by the physician entities prior to implementation. Part of this review process may also include input from appropriate participating subspecialists. As part of the review of the UM Program, all criteria are reviewed and updated as needed, but no less than annually. Providers are advised annually that criteria are available upon request, by mail, fax, or email. Internally developed criteria and a general list of services that require prior authorization are also available on SCFHP's web site. MCG<sup>®</sup> criteria are available to providers upon request with the UM Department. The individual needs of the member and the resources available within the local delivery system are considered when applying medical necessity criteria.

# 1. Adoption of criteria

When adopting medical necessity criteria, SCFHP (with direct oversight by the CMO) will:

- Have written UM decision-making criteria that are objective and based on medical evidence.
   The criteria include medical, long term services and support (LTSS), and behavioral healthcare services requiring review.
- b. Have written policies for applying the criteria based on individual needs. SCFHP considers the clinical variables for review including:
  - a. Age
  - b. Comorbidities
  - c. Complications
  - d. Treatment progress
  - e. Psychosocial factors

- f. Home environment: when applicable
- c. Have written policies for applying the criteria based on an assessment of the local delivery system. The medical, behavioral health, and LTSS units evaluate the local delivery systems in meeting member's needs.
- d. Involve appropriate practitioners in developing, adopting and reviewing criteria via the practitioner involvement in UMC.
- e. Annually review the UM criteria and the procedures for applying them, and updates the criteria when appropriate. SCFHP reviews UM criteria against current clinical and medical evidence and updates them when appropriate.

# 2. Hierarchy of criteria

Utilization review determinations are derived from a consistently applied, systematic evaluation of utilization management decision criteria. The criteria are selected based on nationally recognized and evidence-based standards of practice for medical services and are applied on an individual needs basis. A hierarchy of criteria for UM decision shall be outlined by UM Policies & Procedures.

Other applicable publicly available clinical guidelines from recognized medical authorities are referenced, when indicated. Also when applicable, government manuals, statutes, and laws are referenced in the medical necessity decision making process. The QIC annually reviews the Care Coordinator Guidelines and criteria and applicable government and clinical guidelines for changes and updates.

Additionally, the SCFHP has a formal mechanism to evaluate and address new developments in technology and new applications of existing technology for inclusion in benefit plans in order to keep pace with changes and to ensure that members have equitable access to safe and effective care.

# **B. Medical Necessity**

The UM Program is conducted under the administrative and clinical direction of the CMO and the UMC. Therefore, it is the policy of SCFHP that all medical appropriateness/necessity criteria are developed, reviewed and approved by the physician entities prior to implementation.

Part of this review process may also include input from appropriate participating subspecialists. As part of the review of the UM Program, all criteria are reviewed and updated as needed, but no less than annually. Providers are advised annually that criteria are available upon request. Internally developed criteria and a general list of services that require prior authorization are also available on the web site for SCFHP.

Specific MCG criteria are available to providers by contacting the UM department or the physician reviewer. The individual needs of the member and the resources available within the local delivery system are considered when applying medical necessity criteria.

Members may request a copy of the medical necessity criteria. When the disclosure of UM criteria is made to the public, the disclosure will be accompanied by the following notice:

"The materials provided to you are guidelines used by this Plan to authorize, modify, or deny care for persons with similar illnesses or conditions. Specific care and treatment may vary depending on individual need and the benefits covered under your contract."

The Medicare Model Evidence of Coverage (EOC) defines medically necessary services or supplies as those that are: "1) Proper and needed for the diagnosis or treatment of your medical condition; 2) Used for the diagnosis, direct care, and treatment of your medical condition; 3) Not mainly for your convenience or that of your doctor; and those that 4) Meet the standards of good medical practice in the local community."

#### 1. Medical Necessity Determinations

Medical necessity determinations are made based on information gathered from many sources. As each case is different, these sources may include some or all of the following:

- a) Primary care physician
- b) Specialist physician
- c) Hospital Utilization Review Department
- d) Patient chart
- e) Home health care agency
- f) Skilled nursing facility
- g) Physical, occupational or speech therapist
- h) Behavioral health/chemical dependency provider
- i) Patient or responsible family member

The information needed will often include the following:

- a) Patient name, ID#, age, gender
- b) Brief medical history
- c) Diagnosis, comorbidities, complications
- d) Signs and symptoms
- e) Progress of current treatment, including results of pertinent testing
- f) Providers involved with care
- g) Proposed services
- h) Referring physician's expectations
- i) Psychosocial factors, home environment

The Utilization Review Nurses will use this information, along with good nursing judgment, departmental policies and procedures, needs of the individual member and characteristics of the local delivery system, including the availability of the proposed services within the network service area, or case conference discussions with a SCFHP Medical Director, to make a decision.

If the decision is outside the scope of the Utilization Review Nurse's authority, the case is referred to the Medical Director for a determination. The Medical Director, pharmacists, or designated behavioral health practitioner as appropriate, are the only plan representatives with the authority to deny payment for services based on medical necessity and appropriateness. Psychiatrists, doctoral-level clinical psychologists, or certified addiction medicine specialists have the authority to deny payment for behavioral health care services based on medical necessity

and appropriateness. Alternatives for denied care or services are given to the requesting provider and member and are based on the criteria set used or individual case circumstances. In making determinations based on contract benefit exclusions or limitations, the Member Handbook and Group Services Agreement are used as references.

#### 2. Inter-Rater Reliability

The UM Manager monitors the consistency of the UM/BH/MLTSS/Pharmacy staff in handling pre-service approval, denial and inpatient concurrent review decisions. The Inter-Rater Reliability (IRR) testing process evaluates the consistent application amongst the Health Services teams (UM, BH, MLTSS, pharmacy staff), including all staff who apply medical necessity criteria, including medical directors, registered and licensed vocational nursing staff, pharmacists, pharmacy technicians, and non-clinical staff. Please refer to IRR Policy HS.09.01.

All staff is assessed through the established IRR process at least annually. All new hires are reviewed monthly for the first 90 days and then again annually.

## C. Timeliness of UM Decisions

SCFHP maintains a policy and procedure (P&P) that meets state, federal, and NCQA (National Committee for Quality Assurance) regulations and guidelines for meeting timeliness standards of UM decisions and notification. The P&P is comprehensive and includes non-behavioral and behavioral UM decision and notification timeframes, it is reviewed at least annually. The operations dashboard is updated monthly and staff is monitored and evaluated on meeting timeliness standards.

#### **D.** Clinical Information

When determining coverage based on medical necessity for non-behavioral, behavioral, and pharmacy decisions, SCFHP obtains relevant clinical information and consults with the treating practitioner where necessary. The reviewing medical director or pharmacist shall document any consults conducted and will acknowledge the clinical information considered when making a decision to deny, delay or modify a request for service or care.

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 Assessment

#### E. Transplants

It is SCFHP's policy that all requests for organ transplants be reviewed by the Medical Director or designee. Members are directed to the most appropriate Center of Excellence transplant facility for evaluation based on benefits. The Case Manager coordinates with the facility transplant coordinator to send the transplant recommendation to SCFHP, as appropriate, prior to approval by the Plan. Renal and corneal transplants are excluded from SCFHP review. The Plan's determination of medical necessity will be based on the Transplant Team determination, thus providing an outside, impartial, expert evaluation. Once the member has been approved, the member is enrolled in the United Network for Organ Sharing (UNOS). The patient's acceptance into UNOS serves as the Plan's medical necessity determination. All members that are approved for transplant are followed closely by Case Management as well as Paramount's interdepartmental transplant team, consisting of Medical Directors, Case Managers and Financial, Claims and Actuarial representatives. The purpose of the team is to ensure ongoing medical necessity for transplant, employer group high dollar alert (if self-insured), and reinsurance notification and to ensure appropriate claims payment.

#### F. New Technology Assessment

SCFHP investigates all requests for new technology or a new application of existing technology to determine whether the new technology is investigational in nature. If further information is needed, the Plan utilizes additional sources, including Medicare and Medicaid policy, Food and Drug Administration (FDA) releases and current medical literature. This includes medical and behavioral health procedures and devices. Pharmaceuticals are investigated by the Pharmacy and Therapeutics Committee. If the new technology, pharmaceutical or new application of an existing technology or pharmaceutical is addressed in the above documents, the information is taken into consideration by the Medical Director at the time of benefit determination. If the new technology, pharmaceutical or new application of an established technology/pharmaceutical is not addressed in the above documents, the Medical Director will confer with an appropriate board certified specialist consultant for additional information... The decision will be based on safety, efficacy, cost and availability of information in published literature regarding controlled clinical trials. If a decision cannot be made, a committee of specialists (including medical, pharmacy, and behavioral health practitioners) may be convened to review the new medical technology/pharmaceutical and make a recommendation to the Medical Advisory Council.
# G. Emergency Services/Post-Stabilization Care

No referrals are required for treatment of an emergency medical condition that manifests itself by such acute symptoms of sufficient severity, including severe pain that a prudent layperson with an average knowledge of health and medicine could reasonably expect the absence of immediate medical attention to result in any of the following:

- a. Placing the health of the individual or, with respect to a pregnant woman, the health of the woman, or her unborn child, in serious jeopardy
- b. Serious impairment to bodily functions
- c. Serious dysfunction of any bodily organ or part.

Emergency Room services are also covered if referred by an authorized Plan representative, PCP or Plan specialist. Plan notification (referral) is not required for payment of Emergency Room services for an emergency medical condition.

SCFHP properly arranges for the transfer of members after the member has been stabilized subsequent to an emergency psychiatric or medical condition but the provider believes further medically necessary health care treatment is required and the member cannot be safely discharged.

SCFHP require prior authorization for post-stabilization care

- The Plan shall fully document all requests for authorizations and responses to such requests for post stabilization medically necessary care which shall include the date and time of receipt, the name of the health care practitioner making the request and the name of the SCFHP representative responding to the request.
- The Plan shall have procedure in place if the Plan is unable to provide a determination (approval or denial) within 30 minutes of the request.
- All non-contracting hospitals are able to locate a contact number at which the hospital can obtain authorization from the Plan's web site, annual communication from the plan, and the Department of Managed Health Care's web page for 24/7 Contact of health plans requiring prior authorization for post-stabilization care.
- SCFHP has mechanisms in place to support that a patient is not transferred to a contracting facility unless the provider determines no material deterioration of the patient is likely to occur upon transfer

# H. Determination Information Sources

UM personnel collect relevant clinical information from health care providers to make prospective, concurrent and retrospective utilization review for medical necessity and health plan benefit coverage

determinations. Clinical information is provided to the appropriate clinical reviewers to support the determination review process. Examples of relevant sources of patient clinical data and information used by clinical reviewers to make medical necessity and health plan benefit coverage determinations include the following:

- 1. History and physical examinations
- 2. Clinical examinations
- 3. Treatment plans and progress notes
- 4. Diagnostic and laboratory testing results
- 5. Consultations and evaluations from other practitioners or providers
- 6. Office and hospital records
- 7. Physical therapy notes
- 8. Telephonic and fax reviews from inpatient facilities
- 9. Information regarding benefits for services or procedures
- 10. Information regarding the local delivery system
- 11. Patient characteristics and information
- 12. Information from responsible family members

# I. Health Services

The scope of health services and activities include utilization management, utilization review determinations, referral management, discharge planning, and complex case management.

## **1. Utilization Determinations**

Appropriately licensed and qualified health care professionals with clinical care expertise make UM review determinations according to approved clinical review criteria. Qualified health care professionals supervise utilization review decisions of assigned UM staff and participate or lead UM staff training. These professionals also monitors all UM staff for consistent application of UM criteria for each level and type of UM decision, monitors all documentation for adequacy and is available to UM staff on site or by telephone. Under the supervision of a licensed medical professional, non-clinical staff collects administrative data or structured clinical data to administratively authorize cases that do not require clinical review.

Only a Medical Director, with a current California license to practice without restriction, makes medical necessity denial determinations. A Medical Director (medical or behavioral health) and/or an appropriately licensed pharmacist is available to discuss UM denial determinations with providers, and providers are notified about determination processes in the denial letter.

When applying medical necessity criteria, SCFHP shall

- a. Consider individual needs of members
  - i. Age
  - ii. Comorbidities
  - iii. Complications
  - iv. Progress of treatment
  - v. Psychosocial situation
  - vi. Home environment, as applicable

- b. Assessment of the local delivery system
  - i. Availability of inpatient outpatient and transitional facilities
  - ii. Availability of outpatient services in lieu of inpatient services such as surgery centers vs. inpatient surgery
  - iii. Availability of highly specialized services, such as transplant facilities or cancer centers
  - iv. Availability of skilled nursing facilities, subacute care facilities or home care in the organization's service area to support the patient after hospital discharge
  - v. Local hospitals' ability to provide all recommended services within the estimated length of stay

In accordance with the DHCS contract only qualified health care professionals supervise review decisions, including service reductions, and a qualified physician will review all denials that are made on the basis of medical necessity. Additionally, a qualified physician or pharmacist may approve, defer, modify, or deny prior authorizations for pharmaceutical services, provided that such determinations are made under the auspices of and pursuant to criteria established by the Medical Director, in collaboration with the Pharmacy and Therapeutics Committee (P&T) or generally accepted medical compendia and professional practice guidelines.

UM decisions are not based on the outcome of individual authorization decisions or the number and type of non-authorization decisions rendered. UM decision making is based only on appropriateness of care and service and existence of coverage. The organization does not specifically reward practitioners or other individuals for issuing denials of coverage. Financial incentives for UM decision makers do not encourage decisions that result in underutilization. UM staff involved in clinical and health plan benefit coverage determination process are compensated solely based on overall performance and contracted salary, and are not financially incentivized by the SCFHP based on the outcome of clinical determination.

Board certified physician advisors are available to the UM Program for consultation on clinical issues as well as consultation for potential denials. The UM Program maintains a list of board-certified physician specialists identified for consultation and documents their involvement in member authorization and appeal records when appropriate.

For each non-medical necessity denial, the UM Department documents within it's UM system the reason for and the specific benefit provision, administrative procedure or regulatory limitation used to classify the denial. The UM staff references the sources (e.g. Certificate of Coverage or Summary of Benefits) of the administrative denial. The Plan includes this information in the denial notice sent to the member or the member's authorized representative and the practitioner.

Decisions affecting care are communicated in writing to the provider and member in a timely manner in accordance with regulatory guidelines for timeliness. Notification communication includes appeal rights and procedures. Member notifications comply with appropriate contractual and regulatory guidance for each member's line of business. Member correspondence about authorization decisions includes a statement in each SCFHP threshold language instructing the member how to obtain correspondence in their preferred language.

The UM Program appeals and reconsideration policies and procedures assure members and providers that the same staff involved in the initial denial determination will not be involved in the review of the appeal or reconsideration. Additionally, there is separation of medical decisions from fiscal and

administrative management to ensure medical decisions will not be unduly influenced by fiscal and administrative management.

The UM Program includes the following utilization review processes:

# a) Prospective Review

Prospective (pre-service) review is the process in which utilization review determination for medical necessity or coverage under the health plan benefit is conducted prior to the delivery of a health care service or supply to a member. A prospective review decision is based on the collection of medical information available to the health care provider prior to the time the service or supply is provided.

# b) Concurrent Review

Concurrent review is the process in which utilization review determination for medical necessity or coverage under the health plan benefit is conducted during a member's ongoing stay in a facility or course of outpatient treatment. The frequency of review is based on the member's medical condition with respect to applicable care guidelines.

# c) Retrospective Review

Retrospective (post-service) review is the process in which utilization review determination for medical necessity or coverage under the health plan benefit is conducted after the health care service or supply is provided to a member. A retrospective review decision is based on the medical information available to the health care provider at the time the service or supply was provided.

# d) Standing Referrals

SCFHP has established and implemented a procedure by which a member may receive a standing referral to a specialist. The procedure shall provide for a standing referral to a specialist if the primary care physician determines in consultation with the specialist, if any, and the plan medical director or his or her designee, that an enrollee needs continuing care from a specialist. The referral shall be made pursuant to a treatment plan approved by the health care service plan in consultation with the primary care physician, the specialist, and the enrollee, if a treatment plan is deemed necessary to describe the course of the care. A treatment plan may be deemed to be not necessary provided that a current standing referral to a specialist is approved by the plan or its contracting provider, medical group, or independent practice association. The treatment plan may limit the number of visits to the specialist, limit the period of time that the visits are authorized, or require that the specialist provide the primary care physician with regular reports on the health care provided to the member.

# e) Terminal Illness

In the circumstances where SCFHP denies coverage to member with a terminal illness, which refers to an incurable or irreversible condition that has a high probability of causing death within one year or less, for treatment, services, or supplies deemed experimental, as recommended by a participating plan provider, SCFHP shall provide to the member within five business days all of the following information:

1. A statement setting forth the specific medical and scientific reasons for denying coverage

- A description of alternative treatment, services, or supplies covered by the plan, if any. Compliance with this subdivision by a plan shall not be construed to mean that the plan is engaging in the unlawful practice of medicine
- 3. Copies of the plan's grievance procedures or complaint form, or both. The complaint form shall provide an opportunity for the member to request a conference as part of the plan's grievance system

# f) Communications

Decisions to approve, modify, or deny requests by practitioners for authorization prior to, or concurrent with, the provision of health care services to enrollees shall be communicated to the requesting practitioner verbally as appropriate and in writing. See pages 17 through 21 for notification timelines.

In the case of concurrent review, care shall not be discontinued until the member's treating practitioner has been notified of SCFHP's decision and a care plan has been agreed upon by the treating provider that is appropriate for the medical needs of that patient.

Communications regarding decisions to approve requests by practitioners prior to, retrospectively, or concurrent with the provision of health care services to enrollees shall specify the specific health care service approved. Responses regarding decisions to deny, delay, or modify health care services requested by providers prior to, retrospectively or concurrent with the provision of health care service to enrollees shall be communicated to the enrollee in writing, and to practitioners initially by telephone or facsimile, except with regard to decisions rendered retrospectively, and then in writing, and shall include a clear and concise explanation of the reasons for SCFHP's decision, a description of the criteria or guidelines used, and the clinical reasons for the decisions regarding medical necessity.

Any written communication to a physician or other health care provider of a denial, delay, or modification of a request shall include the name and telephone number of the health care professional responsible for the denial, delay, or modification. The telephone number provided shall be a direct number or an extension, to allow the physician or health care provider to contact the professional responsible for the denial, delay, or modification with ease. Responses shall also include information as to how the member may file a grievance with the Plan.

For non-behavioral, behavioral, and pharmacy communication to members for denial, delay, or modification of all or part of the requested service shall include the following:

- a) Be written in a language that is easily understandable by a layperson
- b) Specify the specific health care service requested
- c) Provide a clear and concise explanation of the reasons for the Plan's decision to deny, delay, or modify health care services. Reason shall be written in layperson terms, easily understandable by the member
- d) Specify a description of the criteria or guidelines used for the Plan's decision to deny, delay, or modify health care services
- e) Specify the clinical reasons for the Plan's decision to deny, delay, or modify health care services
- f) Include information as to how he/she may file a grievance to the Plan
- g) Include information as to how he/she may request an independent medical review

h) Include a statement that members can obtain a copy of the actual benefit provision, guideline, protocol, or other similar criterion on which the decision was based , upon request

# g) Referral Management

# 1. In-network

SCFHP network physicians are the primary care managers for member healthcare services. The network primary care physicians provide network specialist and facility referrals directly to members without administrative pre-authorization from the UM Program, and primary care physicians may coordinate prior authorization for utilization review on a number of services such as DME, home health, and nutritional supplements. These referrals are primarily for routine outpatient and diagnostic services and are tracked by the UM Program from claims and encounter data. All elective inpatient surgeries and non-contracted provider referrals require prior authorization. The UM Program care management system tracks all authorized, denied, deferred, and modified service requests and include timeliness records. These processes are outlined in the Provider Manual and in internal policies and procedures.

# 2. Emergency Services

No referrals or prior authorization requests are required for treatment of an emergency medical condition that manifests itself by such acute symptoms of sufficient severity, including severe pain, that a prudent layperson with an average knowledge of health and medicine could reasonably expect the absence of immediate medical attention to result in any of the following:

- i. Placing the health of the individual or, with respect to a
- ii. Pregnant woman, the health of the woman, or her unborn child,
- iii. In serious jeopardy
- iv. Serious impairment to bodily functions
- v. Serious dysfunction of any bodily organ or part

Emergency Room services are also covered if referred by an authorized Plan representative, PCP or Plan specialist. Plan notification (referral) is not required for payment of Emergency Room services for an emergency medical condition.

# 3. Out of Network

Requests for out-of-network Referrals are reviewed individually and determinations are made based on the patient's medical needs and the availability of services within the Provider Network to meet these needs. A physician reviewer shall assess any requests for out of network referrals.

# 4. Specialist Referrals

The Primary Care Physician (PCP) may request a consultation from a participating specialist physician at any time. No referral is required from SCFHP prior to consultation with any participating specialists.

## 5. Tertiary Care Services

All referrals to Plan tertiary care centers are reviewed on an individual basis. The member's medical needs and the availability of the requested services within the non-tertiary care network are taken into consideration.

## 6. Second Opinions

A request for a second opinion may be initiated by a member or a treating healthcare provider of a member, and at no charge to the member. The processing of a request for a second opinion will be treated with the same criteria for turn-around-time as other UM referral requests. If a second opinion is not available within the Member's network, an out-of-network opinion will be arranged, at no cost other than normal co-payments, to the member. The member Evidence of Coverage provides all members with notice of the policy regarding the manner in which a member may receive a second medical opinion. The second opinion policy is reviewed, revised and approved annually.

## 7. Predetermination of Benefits/Outpatient Certification

Certain procedures, durable medical equipment and injectable medications are prior authorized. SCFHP uses MCG criteria for Imaging, Procedures and Molecular Diagnostics. When MCG criteria does not exist within SCFHP's purchased products, criteria are developed internally by the Utilization Management Committee, Pharmacy and Therapeutics Committee, or a workgroup as appropriate. Additionally, potentially cosmetic surgery and other procedures may be reviewed prospectively, at the request of providers and members, to issue coverage determinations.

# 8. Authorization Tracking

SCFHP tracks a defined sub-set of outpatient authorizations for completion of the authorization to claims paid cycle. This allows for monitoring of possible barriers leading to member non-compliance with prescribed care. In addition, the plan tracks authorizations while in process for timeliness and compliance with regulations and guidelines.

# h) Discharge Planning

Discharge planning is a component of the UM process that assesses necessary services and resources available to facilitate member discharge to the appropriate level of care. UM nurses work with facility discharge planners, attending physicians and ancillary service providers to assist in making necessary arrangements for member post-discharge needs. Behavioral health case managers will work with psychiatric hospital facilities to facilitate member discharge to the most appropriate level of care and community case management. Long Term Services and Supports case managers assist members discharging from long term care.

# i) UM Documents

In addition to this program description other additional documents important in communicating UM policies and procedures include:

- The Provider Manual provides an overview of operational aspects of the relationship between the SCFHP, providers, and members. Information about the SCFHP's UM Program is included in the provider manual. In addition the Provider Manual describes how providers may obtain a copy of the clinical guidelines used to make medical determinations.
- 2. The Provider Manual and the web site also provide information about services/procedures requiring pre-authorization. Changes and updates are communicated to providers via faxed communications, newsletters, bulletins and the website.
- 3. Provider Bulletin is a monthly newsletter distributed to all contracted provider sites on topics relevant to the provider community and can include UM policies, procedures, and activities.
- 4. Evidence of Coverage (EOC) documents are distributed to members based on their product line. Members have the right to submit a complaint or grievance about any plan action, and the EOC document directs members to call the Customer Service phone number to initiate complaints or grievances involving UM issues and actions. Member complaints or grievances are documented in the data system and forwarded to the UM unit for follow-up response. The SCFHP Grievance and Appeal unit coordinates with the UM unit on appropriate responses to member complaints or grievances.

These documents, or summaries of the documents, are available upon request to providers, members, and community partners. In addition, the UM Program information is available on the SCFHP website.

# J. Behavioral Health Management

SCFHP provides access to all standard Medicaid based fee-for-service benefits, including applicable Behavioral Health services. Behavioral Health utilization management practices are in compliance with parity requirements of Medicaid managed care rules and the Affordable Care Act.

SCFHP members receive comprehensive behavioral health and substance abuse services according to their specific benefit package. SCFHP Medi-Cal members obtain mental health and substance use disorder services primarily through the Santa Clara County Behavioral Health Department (CBHD). The Severely Mentally III (SMI) population will be referred through the County Call Center to County Behavioral Health Services, Federally Qualified Healthcare Clinics or Community-Based Organizations. The CBHD will be responsible for payment of services to those who are determined by the CBHD to be SMI. The non-SMI diagnoses will be considered Mild to Moderate and after triage by the County Call Center, will be referred to Network providers by the SCFHP BH department.

Cal Medi-Connect (CMC) members will be treated the same as Medi-Cal members and referred through the County Call Center. The difference in terms of payment for CMC members is that the professional

services for psychiatry, psychology and Licensed Clinical Social Work services are to be billed to SCFHP under the member's Medicare benefit. The Mild to Moderately diagnosed members will be screened by the County Call Center and referred by SCFHP BH department. SCFHP is responsible for payment. Members may contact their County Call Center, or receive physician referral within the member's medical home. SCFHP maintains procedures for primary care providers to coordinate care and services for members in need of behavioral health services including, but not limited to, all medical necessary services across the behavioral health provider network.

Santa Clara Family Health Plan does not impose Quantitative Treatment Limitations (QTL), or Non-Quantitative Treatment Limitations (NQTL) more stringently on covered mental health and substance use disorder services than are imposed on medical/surgical services in accordance with the parity in mental health and substance use disorder requirements in 42 CFR 438.900 et seq.

# 1. Behavioral Health Integration

The SCFHP uses a variety of mechanisms that ensure behavioral health services and management processes are actively integrated into the UM Program and include

- A behavioral healthcare practitioner is involved in quarterly HCQC meetings to support, advise and coordinate behavioral healthcare aspects into UM Program policies, procedures and processes.
- b) A behavioral healthcare practitioner participates as a member of the UM interdisciplinary care team. The UM interdisciplinary care team consists of a Medical Director, Registered Nurse, Pharmacist and Behavioral Healthcare practitioner. The team meets routinely to perform member case reviews. The interdisciplinary care team evaluates topics such as access, availability, health management systems, practice guidelines, clinical and service quality improvement activities, member satisfaction, continuity and coordination of care, and member's rights and responsibilities.
- c) SCFHP routinely receives clinical reports from Santa Clara County Behavioral Health Services Department, which are reviewed by the Manager of Behavioral Health Department or other designee.
- d) SCFHP participates in quarterly operational meetings with the CBHD to review and coordinate administrative, clinical and operational activities.

# 2. Santa Clara County Behavioral Health Care Services

a) Specialty behavioral health services for Medi-Cal members, excluded from the SCFHP contract with DHCS, are coordinated under a Memorandum of Understanding executed with SCFHP. This is a carve-out arrangement for behavioral health management with the State of California directly overseeing and reimbursing the behavioral health services provided to Medi-Cal members.

# 3. The referral procedure for SCFHP members includes

- a) SCFHP Primary Care Providers (PCPs) render outpatient behavioral health services within their scope of practice.
- b) PCPs refer the members to Santa Clara County Behavioral Health Services Department for evaluation and coordination of medically necessary specialty behavioral health services by the Access Team, including inpatient psychiatric care.

- c) PCPs refer members to qualified Medi-Cal providers for the provision of services not covered by CBHD.
- d) Members may contact the County Call Center to be screened and referred to SCFHP BH department for referrals to Network providers of Mild to Moderate services under Medi-Cal, or Cal MediConnect coverage

# K. Pharmacy Management

SCFHP delegates pharmacy utilization management activities in the Cal MediConnect line of business to a pharmacy benefit management (PBM). The PBM possesses a UM program that manages pharmacy services under the delegated arrangement. Overall UM Program oversight is performed by the Chief Medical Officer or designee with supporting policies and procedures reviewed and approved by the Quality Improvement Committee. The Chief Medical Officer and the Director of Pharmacy are responsible for operational and clinical management of the pharmacy UM program. The scope of the UM Program encompasses all delegated processes performed by the PBM. These processes include: intake and triage requests, authorization guideline development, implementation of formulary tools and medication utilization review determinations. The Pharmacy and Therapeutics Committee provides oversight for evidencebased, clinically appropriate UM guideline criteria. Guidelines are developed in conjunction with review of peer-reviewed literature with consideration for such factors as safety, efficacy and cost effectiveness, and also with the input evaluation of external clinical specialists appropriate to the subject matter. In accordance with state, federal, and NCQA requirements, the pharmacy unit monitors timeliness and maintains policies and procedures on timeliness of UM decisions and notifications for pharmacy. An annual review process and ad hoc assessments support the development of guidelines that are current with the latest advancements in pharmaceutical therapy. The UM Program is evaluated annually and submitted to the Utilization Management Oversight Committee UMC for approval. This evaluation includes, but is not limited to: medication UM activities, UM structure and resources, measures to assess the quality of clinical decisions, overall effectiveness of the UM Program and opportunities for UM Program improvement.

# L. Long Term Services and Supports

SCFHP has established and implemented guidelines for Long Term Services and Supports authorizations for services in this area. The LTSS Team including a Long Term Care UM RN and LTSS Case Managers coordinates with the UM department, LTSS providers, and community partners to identify care needs and facilitate access to appropriate services to achieve positive health outcomes.

# M. Confidentiality

SCFHP has written policies and procedures to protect a member's personal health information (PHI). The Health Services Department collects only the information necessary to conduct case management services or certify the admission, procedure or treatment, length of stay, frequency and duration of health care services. We are required by law to protect the privacy of the member's health information. Before any PHI is disclosed, we must have a member's written authorization on file. Within the realm of utilization review and case management, access to a member's health information is restricted to those employees that need to know that information to provide these functions. A full description of SCFHP's Notice of Privacy Practices may be found on our website at: <u>www.scfhp.com</u>.

# N. Interdepartmental collaboration

SCFHP departments collaborate to prevent conflicting information and to align member selfmanagement tools, member education and information provided to the member.



# **BHT Program Description - 2022**



# Santa Clara Family Health Plan (SCFHP) Behavioral Health Treatment (BHT) Program

Welcome to Santa Clara Family Health Plan. As a new contracted behavioral health treatment provider (BHT), Santa Clara Family Health Plan (SCFHP) would like to inform providers regarding SCFHP processes. These processes will include new members needing an initial authorization, a reauthorization to continue services when medically needed, and expectations for the treatment plan. SCFHP will also be requesting from the provider, a description of the staff training plan and program description. A Behavioral Health Treatment Program Manager is available to assist providers and families with BHT related needs. The program manager is available by phone (408) 874-1923 or email at behavioralhealthhelpdesk@scfhp.com.

# Process of authorization:

- SCFHP receives a referral from a Licensed Psychologist, or Licensed Medical Doctor for services. Referral must include supporting clinical documentation establishing medical necessity.
- If there is a Comprehensive Diagnostic Evaluation (CDE), it will be requested from the referring provider.
- SCFHP reviews the prior authorization request (PAR) and approves if the request meets medical necessity and coverage criteria.
- Once approved, Behavioral Health Care Coordinator reaches out to the family if there is no provider identified on referral to find out availability of member, if any other language apart from English is needed, and obtains any other relevant information that the family can provide (ex. member in day care, member used to receive services under Early Start).
- The Behavioral Health Treatment Program Manager will outreach to BHT provider to find out if there is availability for the member to complete the assessment and if recommended based on medically necessity, be able to provide treatment.
- If BHT provider is able to provide services, an authorization letter for assessment is sent to the member, the referring provider, and BHT provider.
- The authorization for assessment completion is for 2 months. The timeframe can be extended if needed for some reason.
- Once the assessment is completed, the BHT provider submits the assessment report to SCFHP for review with the recommended hours for treatment if applicable.
- If BHT therapy is recommended, an approved authorization letter for behavioral health treatment with the recommended hours is sent to the member, referring provider and the BHT provider.
- Treatment is approved for 180 days.
- Progress reports for re-authorization need to be submitted every 180 days. In order to allow time to review and process, it is preferred that the report be submitted a minimum of 2 weeks before authorization expires.
- If BHT therapy is recommended, but does not meet medical necessity, (UM guidelines APL 19-014 and MCG Applied Behavioral Analysis ORG: B-806-T it is reviewed by a Medical Director; all denials are determined by a Medical Director.

• If BHT therapy is denied, a denial letter for behavioral health treatment is sent to the member and referring provider.

# All Plan Letter 19-014: RESPONSIBILITIES FOR BEHAVIORAL HEALTH TREATMENT COVERAGE FOR MEMBERS UNDER THE AGE OF 21

The approved behavioral treatment plan must also meet the following criteria:

- Include a description of patient information, reason for referral, brief background information (e.g., demographics, living situation, or home/school/work information), clinical interview, review of recent assessments/reports, assessment procedures and results, and evidence-based BHT services.
- Delineate both the frequency of baseline behaviors and the treatment planned to address the behaviors.
- Identify measurable long-term, intermediate-term, and short-term goals and objectives that are specific, behaviorally defined, developmentally appropriate, socially significant, and based upon clinical observation.
- Include outcome measurement assessment criteria that will be used to measure achievement of behavior objectives.
- Include the member's current level of need (baseline, behavior parent/guardian is expected to demonstrate, including condition under which it must be demonstrated and mastery criteria [the objective goal]), date of introduction, estimated date of mastery, specify plan for generalization and report goal as met, not met, modified (include explanation).
- Utilize evidence-based BHT services with demonstrated clinical efficacy tailored to the member.
- Clearly identify the service type, number of hours of direct service(s), observation and direction, parent/guardian training, support and participation needed to achieve the goals and objectives, the frequency at which the member's progress is measured and reported, transition plan, crisis plan, and each individual provider who is responsible for delivering services.
- Include care coordination that involves the parents or caregiver(s), school, state disability programs, and other programs and institutions, as applicable.
- Consider the member's age, school attendance requirements, and other daily activities when determining the number of hours of medically necessary direct service and supervision.
- Deliver BHT services in a home or community-based setting, including clinics. Any portion of medically necessary BHT services that are provided in school must be clinically indicated as well as proportioned to the total BHT services received at home and in the community.
- Include an exit plan/criteria. However, only a determination that services are no longer medically necessary under the EPSDT standard can be used to reduce or eliminate services.

# SCFHP Treatment Codes & Guidelines

- H0031 Initial Assessment & 6-month Reassessment
- **H2019 Direct Service**-*If the recommendation exceeds 25 hours per week, please provide an explanation for review.*

- H0032- Supervision (Direct) and H0032 (indirect)- Service Plan Development and S5111 Parent Training (Direct Service) 2 hours of Direct Supervision and/or Parent Training sessions for every 10 hours of direct treatment; Service Plan Development 1 hour for every 2 hours of Direct Supervision and/or parent training sessions; If exceeds these guidelines, please provide an explanation.
- H2014 Social Skills Group Guideline is ratio of 1 provider to no more than 3 members in the group

*Every ABA treatment plan is based on individual needs; these are basic guidelines. If the needs are different, please submit an explanation for review.* 

All Plan Letter 19-014: RESPONSIBILITIES FOR BEHAVIORAL HEALTH TREATMENT COVERAGE FOR MEMBERS UNDER THE AGE OF 21

Medi-Cal does not cover the following as BHT services under the EPSDT benefit:

- Services rendered when continued clinical benefit is not expected, unless the services are determined to be medically necessary.
- Provision or coordination of respite, day care, or educational services, or reimbursement of a parent, legal guardian, or legally responsible person for costs associated with participation under the behavioral treatment plan.
- Treatment where the sole purpose is vocationally- or recreationally-based.
- Custodial care. For purposes of BHT services, custodial care:
  - a. Is provided primarily to maintain the member's or anyone else's safety; and,
  - b. Could be provided by persons without professional skills or training.
- Services, supplies, or procedures performed in a non-conventional setting, including, but not limited to, resorts, spas, and camps.
- Services rendered by a parent, legal guardian, or legally responsible person.
- Services that are not evidence-based behavioral intervention practices.

# BHT services for Autism Spectrum Disorder (ASD), or where there is suspicion of ASD that is not yet diagnosed, must be:

- Medically necessary, as defined for the EPSDT population;
- Provided and supervised in accordance with MCP-approve behavioral treatment plan that is developed by a BHT service provider who meets the requirements in California's Medicaid State Plan; and,
- Provided by a qualified autism provider who meets the requirements contained in California's Medicaid State Plan or licensed provider acting within the scope of their licensure.

# BHT services for members without an ASD diagnosis must be:

- Medically necessary, as defined for the EPSDT population;
- Provided in accordance with an MCP-approved behavioral treatment plan; and,

Provided by a licensed provider acting within the scope of their licensure.



# Annual Review of UM Policies



Policy Title:	Prior Authorization		Policy No.:	HS.01
Replaces Policy Title (if applicable):	Programs Prior Auth Process; Prior Authorization Process		Replaces Policy No. (if applicable):	UM002_07; UM002_09; UM002_08; UM031_04; UM033_04
Issuing Department:	Health Services		Policy Review Frequency:	Annually
Lines of Business (check all that apply):	🛛 Medi-Cal 🛛 🖾 CN		IC	

To define Santa Clara Family Health Plan (SCFHP)'s consistent processes and guidelines for conducting prior authorization and organization determinations.

## II. Policy

- A. SCFHP has developed, maintains, continuously improves and annually reviews a Utilization Management Program. The UM Program Description and written procedures addresses required functions to support the consistent application of criteria.
  - 1. The Utilization Management Director and the Chief Medical Officer are responsible to develop, maintain, continuously improve and annually review a Utilization Management Program Description. The UM Program Description and written procedures include information about the following:
    - i The process for prior-authorization and organization determinations
    - ii Involvement of licensed healthcare professionals including a full time Medical Director
    - iii Involvement of the Medical Director or other designated licensed professional for any denials or modification decisions based on medical necessity
    - iv Involvement of the Medical Director or Pharmacist for any pharmaceutical denials / adverse determinations based on medical necessity
    - v Involvement of a Behavioral Health specialist for any behavioral health denials / adverse determination based on medical necessity
    - vi Use of established criteria for approving, modifying, deferring, or denying requested health services as well as a separate policy regarding medical necessity criteria
    - vii Involvement of providers in adoption of specific criteria
    - viii Allowance for second opinions
    - ix The integration of UM activities into the Quality Improvement Committee (QIC)

# POLICY

- B. Communications to health care practitioners about the procedures and services that require prior authorization
- C. The plan shall provide or arrange for all medically necessary Medi-Cal and/or Medicare covered services (including Major organ Transplant (MOT) related services) respectfully by the member's benefit, and to ensure that these services are provided in an amount no less than what is offered to members under fee-for-service.
- D. Prior Authorization is not required for Emergency Services (including Emergency Behavioral Health Services), urgent care, consent services for a member who is a minor under 18 years of age, family planning services, preventive services, basic prenatal care, sexually transmitted disease services, and HIV testing.
  - 1. The Plan applies the prudent layperson or reasonable person's interpretation of what may be considered an emergent condition. A policy regarding coverage of emergency services is maintained, revised and reviewed annually and as needed.
- E. The plan shall provide medically necessary enteral nutrition products, or formulas, and establish procedures for medical authorization requirements and list of enteral nutrition products.
- F. The Plan has established turn-around times for each line of business which is monitored for compliance
  - 1. Decisions are made in a timely manner and are not unduly delayed for medical conditions requiring time sensitive services. In addition, all decisions are clearly documented.
- G. The plan allows for new members to continue services with out-of-network providers for a defined period of time in order to facilitate a smooth transition of care into the Plan's network as specified in Continuity of Care benefit.
- H. The Plan maintains a procedure for Continuity of Care for both medical and behavioral health services.
- Out of Area and Out of Network requests are processed in accordance to the Member's Evidence of coverage, the Plan's Continuity of Care procedure for medical and behavioral health, and are reviewed based on medical necessity.
- J. Members and providers have access to the Utilization Management Department at least eight hours a day during normal business hours of at least 8:30 a.m. to 5:00 p.m. Pacific Time.
- K. The Nurse Line is available after hours for timely authorization of covered services that are Medically Necessary and to coordinate transfer of stabilized members in the emergency department, if necessary.
  - 1. The Plan gathers all relevant information in order to make a prior authorization determination. This includes considerations outside of the clinical information such as support system, other resources and location.
- L. The Plan maintains a policy and procedure for allowing members access to a second opinion
- M. The Pan maintains a policy on requiring use of appropriate/qualified professionals for UM functions such as
  - 1. Licensed vs. non-licensed functions
  - 2. Specialist requirements (BH, other)

# Responsibilities

Health Services collaborates with internal and external stakeholders to ensure optimal utilization management of services for plan members. This includes working with Quality, Compliance, Information Technology, Provider Network Operations, Customer Services, outside community resources, and providers.

# POLICY

# III. References

- . CA.gov. (2016, February 11). Retrieved February 22, 2015, from California Department of Managed HealthCare: https://www.dmhc.ca.gov/
- . Medicare Coverage Data Base. (2016, February 07). Retrieved February 07, 2016, from CMS.gov:

https://www.cms.gov/medicare-coverage-database/

. NCQA Guidelines. (2016, February 22). Washington, DC, U.S.A.

. APL 21-015: Benefit Standardization and Mandatory Managed Care Enrollment Provisions of the California Advancing and Innovating Medi-Cal Initiative.

# V. Approval/Revision History

First Level Approval			Second Level Appr	oval	
Signature			Sigr	ature	
Dang Huynh, PharmD			Lau	rie Nakahira, DO	
Name		Nan	ne		
Director, P	harmacy & Utilization	Management	Chief Medical Officer		
Title			Title		
Date			Dat	e	
Version	Change (Original/	<b>Reviewing Committe</b>	е	Committee Action/Date	<b>Board Action/Date</b>
Number	Reviewed/ Revised)	(if applicable)		(Recommend or Approve)	(Approve or Ratify)
1	Original	Utilization Managemen	t	Approved 1/18/2017	
1	Reviewed	Utilization Management		Approved 1/17/2018	
1	Reviewed	Utilization Managemen	t	Approved 1/16/2019	
2	Revised	Utilization Managemen	t	Approved 10/16/2019	
3	Revised	Utilization Managemen	t	Approved 1/20/2021	
4	Revised	Utilization Managemen	t		



Policy Title:	Medical Necessity Criteria	Policy No.:	HS.02
Replaces Policy Title (if applicable):	Application Policy; Utilization No. Management Review Standard Gularity and Gularit	Clinical Decision Criteria and Application Policy; Utilization No. Management Review Standards, applicable): UM Inter-rater Reliability Testing	
Issuing Department:	Health Services	Health Services Policy Review	
Lines of Business (check all that	⊠Medi-Cal	⊠Medi-Cal ⊠CMC	

To define Santa Clara Family Health Plan's use of medical necessity criteria for utilization management activities of the local delivery system, which includes the mandate that they are applied appropriately and consistently to determination of medical necessity of coverage.

## II. Policy

The Plan maintains a Utilization Management (UM) Program description and Prior Authorization Procedure which further describe the Plan's utilization of Medical Necessity Criteria. The following factors apply:

- A. Criteria is based on current sound clinical evidence to make utilization determination
- B. Criteria is specific to the services and procedures requested
- C. Criteria is used to evaluate the medical necessity of medical, behavioral healthcare and pharmaceutical services
- D. The Plan annually defines the hierarchy of criteria application for each line of business
- E. In addition to the UM hierarchy of guidelines, the Plan is licensed to use MCG<sup>™</sup> guidelines to guide utilization management determinations.
- F. The criteria is reviewed and adopted at least annually by the Utilization Management Committee (UMC)
  - 1. The UMC consists of external physicians, both primary care providers and specialists (including pediatric and behavioral health specialists), in developing, adopting, and reviewing criteria
- G. The review for medical necessity is based on an individual member's needs and circumstances, relative to appropriate clinical criteria and the Plan's policies
- H. The Plan defines the availability of criteria and states in writing how practitioners can obtain UM criteria and how the criteria is made available to the practitioners and members upon request
- I. The plan evaluates the consistency with which health care professionals involved with any level of applying UM criteria in decision making and takes appropriate corrective actions to improve areas of non-compliance at least annually

# POLICY

- J. Where applicable, UM criteria is developed for parity diagnoses, for the diagnosis and treatment of serious mental illnesses, autistic disorders, and other pervasive-developmental disorders and serious emotional disturbances of a child.
  - This includes criteria consistent with standards of practice for the following mental parity conditions: Schizophrenia, Schizoaffective disorder, Bipolar disorder, Major Depressive Disorders, Panic disorder, Obsessive-compulsive disorder, Pervasive developmental disorder or autism, Anorexia Nervosa, Bulimia Nervosa and Severe Emotional Disturbances of Children.

# III. Responsibilities

Chief Medical Officer or designee shall review annually and submits criteria, policies and procedures to the Utilization Management Committee for approval.

# IV. References

National Committee for Quality Assurance. 2020 Program Standards and Guidelines – UM 2: Clinical Criteria for UM Decisions

# V. Approval/Revision History

First Level Approval			Second	Level Approval
Signature		<u>s</u>	ignature	
Dang Huy	/nh, PhamD	I	Laurie Nakahira, DO	
Name		N	lame	
Director,	Director, Pharmacy & Utilization Management		СМО	
		<b>T</b>		
Title		1	itie	
litle			Itie	
litle			lue	
Title Version	Change (Original/	Reviewing Committee	Committee Action/Date	Board Action/Date
	Change (Original/ Reviewed/			Board Action/Date (Approve or Ratify)
Version		Reviewing Committee	Committee Action/Date	
Version	Reviewed/	Reviewing Committee	Committee Action/Date (Recommend or	
Version Number	Reviewed/ Revised)	Reviewing Committee (if applicable)	Committee Action/Date (Recommend or Approve)	
Version Number V1	Reviewed/ Revised) Original	Reviewing Committee (if applicable) Utilization Management	Committee Action/Date (Recommend or Approve) Approved 04/20/2016	
Version Number V1 V1	Reviewed/ Revised) Original Reviewed	Reviewing Committee (if applicable) Utilization Management Utilization Management	Committee Action/Date (Recommend or Approve) Approved 04/20/2016 Approved 01/18/2017	
Version Number V1 V1 V1 V1	Reviewed/ Revised) Original Reviewed Reviewed	Reviewing Committee (if applicable) Utilization Management Utilization Management Utilization Management	Committee Action/Date (Recommend or Approve) Approved 04/20/2016 Approved 01/18/2017 Approved 01/17/2018	
Version Number V1 V1 V1 V1 V1 V1	Reviewed/ Revised) Original Reviewed Reviewed Reviewed	Reviewing Committee (if applicable) Utilization Management Utilization Management Utilization Management Utilization Management	Committee Action/Date (Recommend or Approve) Approved 04/20/2016 Approved 01/18/2017 Approved 01/17/2018 Approved 01/16/2019	



Policy Title:	Appropriate Use of Professionals		Policy No.:	HS.03
Replaces Policy Title (if applicable):	None		Replaces Policy No. (if applicable):	None
Issuing Department:	Health Services		Policy Review Frequency:	Annually
Lines of Business (check all that apply):	⊠ Medi-Cal ⊠ CM		1C	

To define Santa Clara Family Health Plan (SCFHP)'s process of ensuring all Utilization Management (UM) activities are carried out by qualified personnel, not limited to but including utilization of licensed healthcare professionals for any determination requiring clinical judgment.

## II. Policy

- A. SCFHP's UM department carries out various utilization activities, which require different levels of licensure or expertise.
- B. The Plan specifies the type of personnel responsible for each level of determination making which includes:
  - 1. Non-licensed staff may apply established and adopted UM Care Coordinator Guidelines that do not require clinical judgment.
  - 2. Only qualified licensed healthcare professionals can assess received clinical information used to support UM determinations.
  - 3. Only a physician, designated behavioral health practitioner or pharmacist may make a medical necessity modification or denial determination.
- C. Licensed UM management designee and/ or medical directors supervises all medical necessity determinations and provides day to day supervision of assigned UM staff.
- D. UM management designee and medical directors will provide updated training, in-services annually and as needed to non-licensed and licensed UM staff.
- E. The Plan maintains written job descriptions with qualifications for practitioners who review denials based on medical necessity which addresses education, training, experience and current appropriate clinical licensure.
- F. The Plan maintains a fulltime Medical Director and Chief Medical Officer. Each maintain an unrestricted physician license in the state of California.
- G. The Plan requires that each UM denial file includes the reviewer's initial, unique electronic signature, identifier or a signed / initialed note by the UM staff person attributing the denial determination to the professional who reviewed and determined the case.
- H. The plan maintains written procedures for using board certified consultants to assist in making medical necessity determinations, which document evidence of the use of the consultants when applicable.

# POLICY

# III. Responsibilities

Health Services follows appropriate professionals supported by Human Resources for licensing verification and Provider Network Management monitoring of the professional licensing organizations.

#### IV. References

National Committee for Quality Assurance. 2020 Standards and Guidelines - UM 4: Appropriate Professionals

# V. Approval/Revision History

First Level Approval		Secor	nd Level Approval	
	ynh, PhamD		Signature Laurie Nakahira, DO	
Name	me rector, Pharmacy & Utilization Management		Name	
Title	Pharmacy & Utilization	n Wanagement	CMO Title	
Version	Change (Original/	<b>Reviewing Committee</b>	Committee Action/Date	Board Action/Date
Number	Reviewed/ Revised)	(if applicable)	(Recommend or Approve)	(Approve or Ratify)
V1	Original	<b>Utilization Management</b>	Approved 01/08/2017	
V1	Reviewed	<b>Utilization Management</b>	Approved 01/17/2018	
V1	Reviewed	Utilization Management	Approved 01/16/2019	
V2	Revised	Utilization Management	Approved 01/15/2020	
V3	Revised	<b>Utilization Management</b>	Approved 01/20/2021	
V4	Revised	Utilization Management		



Policy Title:	Denial of Services Notification	Policy No.:	HS.04
Replaces Policy Title (if applicable):	Member Notification about Adverse Medical Service De <b>applicable):</b>	UM-01-96	
Issuing Department:	Health Services	Policy Review Frequency:	Annually
Lines of Business (check all that	⊠Medi-Cal	⊠смс	

To define Santa Clara Family Health Plan (SCFHP)'s process to ensure the utilization review meeting the expectation of timely, consistent, accurate and understandable notification to members and providers regarding adverse determinations.

## II. Policy

- A. The plan maintains strict processes on notification of denial decisions to members and providers. Notification includes verbal and written processes. A procedure is maintained that outlines timeliness guidelines and regulatory compliance.
- B. A "peer to peer" review mechanism is in place to allow providers to discuss a denial with a physician reviewer prior to submitting an appeal. This is documented when such discussions occur.
- C. Letters will be provided in the member's preferred language noted on the member's plan file within the 5 threshold languages requirement.
- D. Letters to members for denial, delay, or modification of all or part of the requested service include:
  - 1. A clear and concise explanation of the reason(s) for the Plan's determination to deny or modify the requested service
  - 2. A reference to the specific benefit provision, criteria or guidelines used for the Plan's determination
  - 3. A specific clinical reason(s) or rationale for the Plan's determination without the use of detailed medical verbiage and/or technical language that is easily understandable for a reasonable layperson
  - 4. The specific information needed and the specific criterion used if the denial is due to not enough clinical information to support full clinical review
  - 5. Notice that a copy of the actual benefit provision, guideline, protocol or other similar criterion on which the denial determination was based is available upon request
  - 6. Notice that notifications are available in other languages upon request and that translation services in alternative formats can be requested for members with limited language proficiency

# POLICY

- 7. The name of the determining health care professional as well as the telephone number to allow the physician or provider to easily contact the determining health care professional on the written notification to the requesting provider for "peer to peer"
- 8. Instruction on how to file an appeal including:
  - i. A description of appeal rights, including the right to submit written comments, documents or other information relevant to the appeal
  - ii. An explanation of the appeal process, including members' rights to representation and appeal time frames
  - iii. A description of the expedited appeal process for urgent pre-service or urgent concurrent denials
  - iv. A description on how to appeal to the Independent Medical Review body appropriate to their line of business (i.e. State DMHC for Medi-Cal, Maximus for Medicare)

# III. Responsibilities

Health Services coordinates with both internal and external stakeholders in development, execution, maintenance and revisions to denial notifications. This includes but is not limited to collaboration with Quality, Benefits, IT, UM Committee, QIC, providers and community resources.

## IV. References

*CA.gov.* (2016, February 11). Retrieved February 22, 2015, from California Department of Managed HealthCare: https://www.dmhc.ca.gov/

*Medicare Coverage Data Base*. (2016, February 07). Retrieved February 07, 2016, from CMS.gov: https://www.cms.gov/medicare-coverage-database/

NCQA Guidelines. (2016, February 22). Washington, DC, U.S.A.

Department of Health Care Services. ALL PLAN LETTER 17-011 STANDARDS FOR DETERMINING THRESHOLD LANGUAGES AND REQUIREMENTS FOR SECTION 1557 OF THE AFFORDABLE CARE ACT. Retrieved 12/18/2018<u>https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2017/APL17-011.pdf</u>

# V. Approval/Revision History

First Level Approval	Second Level Approval
Signature	Signature
Dang Huynh, PhamD	Laurie Nakahira, DO
Name	Name
Director, Pharmacy & Utilization Management	СМО
Title	Title
VersionChange (Original/ NumberReviewing CommitteeNumberReviewed/ Revised)(if applicable)	Committee Action/Date Board Action/Date (Approve or Ratify)

# POLICY

	(Recommend or						
		Approve)					
V1	Original	Utilization Management	Approved 01/18/2017				
V1	Reviewed	Utilization Management	Approved 01/17/2018				
V1	Reviewed	Utilization Management	Approved 01/16/2019				
V2	Revised	Utilization Management	Approved 01/15/2020				
V2	Reviewed	<b>Utilization Management</b>	Approved 01/20/2021				
V3	Revised	Utilization Management	Approved				



Policy Title:	Evaluation of New Technology		Policy No.:	HS.05
Replaces Policy Title (if applicable):	None		Replaces Policy No. (if applicable):	None
Issuing Department:	Health Services		Policy Review Frequency:	Annually
Lines of Business (check all that apply):	⊠ Medi-Cal ⊠ CM		1C	

To define Santa Clara Family Health Plan (SCFHP)'s process to ensure members have equitable access to new technology or new developments in technology that is determined to be safe and effective as aligned with benefits.

#### II. Policy

- A. The Plan establishes and maintains a formal mechanism for selective evaluation and adoption of new or innovative technologies in utilization review.
  - 1. New developments in technology and new applications of existing technology is necessary for inclusion considerations in its benefits plan as allowed, to keep pace with changes in the healthcare industry and to allow for improved outcomes of medical care.
- B. The Plan maintains written processes for evaluating new technology and new applications of existing technologies for inclusion in its benefits, where allowed by payors. Processes will address assessment of new technologies for medical procedures, behavioral health procedures, pharmaceuticals, and devices.
- C. The Plan investigates all requests for new technology or a new application of existing technology by using Up to Date as a primary guideline to determine if the technology is considered investigational in nature.
  - Up to Date is an evidence-based clinical decision support resource for healthcare practitioners. If further information is needed, the plan utilizes additional sources, include Medicare and Medicaid policy, Food and Drug Administration (FDA) releases and current medical literature for review. This includes medical and behavioral health procedures and devices.
- D. If the new technology, pharmaceutical, or new application of an established technology/pharmaceutical is not addressed in the above documents, the Medical Director's critical evaluation will proceed to conferring with an appropriate specialist consultant for additional information.

#### III. Responsibilities

Health Services coordinates efforts with internal stakeholders to ensure new technology is assessed for regulatory appropriateness and efficacy. Benefit changes are coordinated with IT and compliance.

# IV. References

*CA.gov.* (2016, February 11). Retrieved February 22, 2015, from California Department of Managed HealthCare: https://www.dmhc.ca.gov/

Medicare Coverage Data Base. (2016, February 07). Retrieved February 07, 2016, from CMS.gov: https://www.cms.gov/medicare-coverage-database/

NCQA Guidelines. (2016, Februrary 22). Washington, DC, U.S.A.

# V. Approval/Revision History

First Level Approval			Second Level Approval		
Signature	1		Signature		
Dang Huy	nh, PhamD		Laurie Nakahira, DO		
Name			Name		
Director	Pharmacy & Utilizatior	Management	СМО		
	Fild macy & Othization				
Title			Title		
Version	Change (Original/	<b>Reviewing Committee</b>	<b>Committee Action/Date</b>	<b>Board Action/Date</b>	
Number	Reviewed/ Revised)	(if applicable)	(Recommend or Approve)	(Approve or Ratify)	
V1	Original	<b>Utilization Management</b>	Approved 01/18/2017		
V1	Reviewed	<b>Utilization Management</b>	Approved 01/17/2018		
V1	Reviewed	<b>Utilization Management</b>	Approved 01/16/2019		
V2	Revised	Utilization Management	Approved 01/15/2020		
V2	Reviewed	<b>Utilization Management</b>	Approved 01/20/2021		
V3	Revised	<b>Utilization Management</b>	Approved		



Policy Title:	Emergency Services		Policy No.:	HS.06
Replaces Policy Title (if applicable):	None		Replaces Policy No. (if applicable):	None
Issuing Department:	Health Services		Policy Review Frequency:	Annually
Lines of Business (check all that apply):	🛛 Medi-Cal		IC	

To define Santaclara Family Health Plan (SCFHP)'s process in ensuring the coverage of Emergency Medical Conditions and Urgent Care services.

## II. Policy

- A. Emergency medical and behavioral services are available and accessible within the service area 24 hours-a-day, seven (7) days-a-week
- B. The Plan maintains contracts with behavioral health practitioners and facilities to provide services to members that require urgent or emergent Behavioral Healthcare for crisis intervention and stabilization
- C. SCFHP allows ambulance services for the area served to transport the member to the nearest 24-hour emergency facility with physician coverage
- D. The Plan does not require prior authorization for access to emergency or urgent medical and behavioral services for contracted and non contracted providers
- E. The Plan shall have processes to handle post-stabilization care requests
- F. The Plan applies prudent layperson or reasonable person's interpretation of what may be considered an emergent condition and to define emergency department access. Each case will be assessed on the presenting symptoms or conditions that steered the member to the Emergency Department
- G. It is the policy of SCFHP to allow 24-hour access care for members and providers to obtain timely authorization for medically necessary care where the member has received emergency services and the care has been stabilized by the treating physician feels that member may not be discharged safely
- H. The Plan will not deny reimbursement of a provider for a medical screening examination in the Emergency Department
- I. The Plan makes the Emergency Department utilization management processes available to all facilities, including non-contracting hospitals by posting on the Plan website for public view and providing the phone number to call on the membership card.
  - i. M. All ED practices are considered at least annually

#### III. Responsibilities

Health Services collaborates internally with Provider Network Management, compliance and Information Technology to ensure that emergency services are covered.

# IV. References

 CA.gov. (2016, February 11). Retrieved February 22, 2015, from California Department of Managed HealthCare: https://www.dmhc.ca.gov/
Medicare Coverage Data Base. (2016, February 07). Retrieved February 07, 2016, from CMS.gov: https://www.cms.gov/medicare-coverage-database/
NCQA Guidelines. (2016, February 22). Washington, DC, U.S.A.

# V. Approval/Revision History

First Level Approval		Second Level Approval			
Signature			Signature		
Dang Huy	nh, PhamD		Laurie Nakahira, DO		
Name			Name		
	Pharmacy & Utilizatior	n Management	СМО		
Title			Title		
Version Number	Change (Original/ Reviewed/ Revised)	Reviewing Committee (if applicable)	Committee Action/Date (Recommend or Approve)	Board Action/Date (Approve or Ratify)	
V1	Original	<b>Utilization Management</b>	Approved 01/18/2017		
V1	Reviewed	<b>Utilization Management</b>	Approved 01/17/2018		
V1	Reviewed	<b>Utilization Management</b>	Approved 01/16/2019		
V2	Revised	Utilization Management	Approved 01/15/2020		
V3	Revised	Utilization Management	Approved 01/20/2021		
V4	Revised	Utilization Management			



Policy Title:	Long Term Care Utilization Review		Policy No.:	HS.07
Replaces Policy Title (if applicable):	Authorization and Review Process – Long Term Care (LTC)		Replaces Policy No. (if applicable):	HS.14
Issuing Department:	Health Services		Policy Review Frequency:	Annual
Lines of Business (check all that apply):	🛛 Medi-Cal	⊠ смс		

To define Santa Clara Family Health Plan (SCFHP)'s requirements for reviewing and processing Long Term Care (LTC) authorizations for a member's admission to, continued stay in, or discharge from a Skilled Nursing Facility (SNF)

## II. Policy

- A. The Plan authorizes utilization of Medi-Cal long term care (LTC) services for its members when medically necessary and determine level of care and length of stay based on the member's current assessment consistent with Medi-Cal criteria.
- B. Requests for admission to, continued stay in, or discharge from any LTC facility shall be reviewed and processed in accordance with the California Department of Health Services (DHCS) standard clinical criteria for LTC level of service. LTC level of care Prior Authorization Request (PAR) processing procedure will be in compliance with applicable regulatory requirements.
- C. Decisions to deny or authorize a duration or scope that is less than requested shall be made by a qualified health care professional with appropriate clinical expertise in treating the medical or behavioral health condition and diseases.
- D. SCFHP notifies LTC providers of required supporting documentation for Utilization review. When PAR submissions do not include required documentation, SCFHP will follow up with the nursing facility with 3 outreach attempts to request the documents and if they are not received, the PAR will be reviewed and possibly denied by a medical professional for insufficient information.
- E. On-site level of care review by a Licensed Nurse for an LTC PAR may be performed at the discretion of SCFHP. This review shall include an assessment of the Member and review of the current medical orders, and care plan, therapist treatment plan, the facility's multidisciplinary team notes, or other clinical data to assist SCFHP staff in making an appropriate determination on the authorization request. On-site review may be done when indicated for patterns of over service utilizations, frequent acute hospitalizations, and/or large number of member complaints or concerns.
- F. Authorizations of LTC PAR for continued stay shall be submitted by the nursing facility to SCFHP prior to the expiration of the current LTC authorization. The requests shall include a completed LTC PAR signed by a physician, the most recent Quarterly Assessment MDS, and sufficient documentation to justify the level of care and continued stay. Authorizations for LTC may be approved for up to one year.

- G. The Plan may arrange and coordinate with the nursing facility for modification of care or discharge of a member from a nursing facility if it determines that one or more of the following circumstances are present:
  - The SNF is no longer capable of meeting the member's health care needs;
  - The member's health has improved sufficiently so that he or she no longer needs SNF services;
  - The member poses a risk to the health or safety of individuals in the nursing facility; or
  - The SNF does not meet SCFHP network standards because of documented quality of care concerns.
- H. The Plan shall include, as a separate benefit, any leave of absence, or Bed Hold, that a nursing facility provides in accordance with the Department of Health Care Services (DHCS) requirements of up to 7 calendar days per discharge. The member's attending physician must write a physician order for a discharge or transfer at the time the member requires a discharge or transfer from an LTC facility to a General Acute Care Hospital and include an order for Bed Hold with the reason.
- I. The Plan shall be responsible for the timely provision of a member's medical needs, supports and services through the LTC post-discharge and transition to community. The discharge planning may include but is not limited to:
  - Documentation of pre-admission, or baseline status including: living arrangements, functional status, durable medical equipment (DME) and other services received; understanding of medical condition or functional status by the member or representative, physical and mental health status, financial resources and social supports.
  - Initial set-up of services needed after the discharge including medical care, medication, DME, identification and integration of community long term services and supports, type of placement preferred and agreed to, hospital recommendations and pre-discharge counseling recommended.
  - Initial coordination of care, as appropriate with the member's caregiver, other agencies and knowledgeable personnel, as well as providing care coordination contact information for the facility.
  - Provision of information for making follow up appointments

#### References

SCFHP Utilization Management Program Description

- 1. Duals Plan Letter (DPL) 14-002 Requirements for Nursing Facility Services
- 2. Duals Plan Letter (DPL) 14-004 Continuity of Care
- 3. Duals Plan (DPL) 16-003; Discharge Planning for Cal MediConnect
- 4. Manual of Criteria for Medi-Cal Authorization, Medi-Cal Policy Division
- 5. Title 22, California Code of Regulations (CCR) §§ 51120, 51121, 51124, 5125, 51118, and 51212
- 6. Welfare &Institutions Code §§ 14087.55, 14087.6, 14087.9 and 14103.06

# III. Approval/Revision History

First Level Approval			Second Level Approval		
Signature			Signature		
Dang Huyn	h, PhamD	I	Laurie Nakahira, DO		
Name			Name		
Director, P	harmacy & Utilization	Management	СМО		
Title			Title		
Version Number	Change (Original/ Reviewed/ Revised)	Reviewing Committee (if applicable)	Committee Action/Date (Recommend or Approve)	Board Action/Date (Approve or Ratify)	
V1	Original	Utilization Management	Approved 04/18/2018	(rippione of futurity)	
V2	Reviewed	Utilization Management	Approved 01/16/2019		
V3	Revised	<b>Utilization Management</b>	Approved 01/15/2020		
V3	Reviewed	<b>Utilization Management</b>	Approved 01/20/2021		
V4	Revised	<b>Utilization Management</b>			



Policy Title:	Second Opinion		Policy No.:	HS.08
Replaces Policy Title (if applicable):	Second Opinion Policy and Procedure		Replaces Policy No. (if applicable):	UM-30-96; UM036_01
Issuing Department:	Health Services		Policy Review Frequency:	Annually
Lines of Business (check all that apply):	🖾 Medi-Cal	⊠ CN	1C	

To define Santa Clara Family Health Plan (SCFHP)'s process of obtaining second opinions and member access to a second opinion by appropriate healthcare professionals.

## II. Policy

- A. Member, member's AOR or a treating healthcare provider of a member can initiate a request for a second opinion.
- B. The SCFHP Member Handbook provides all members with notice of the policy regarding the manner in which a member may receive a second medical opinion.
- C. The Plan provides or authorizes a second opinion by an appropriately qualified health care professional, if requested by a member or participating health professional.
- D. The Plan authorizes the second opinion requests not to exceed the any appliciable regulatory requirements.
- E. The member may choose from any provider from any independent practice association or medical group within the network of the same or equivalent specialty to provide the second opinion.
- F. If the member requests a second opinion from an out-of-network specialist which is approved by the Plan, the Plan shall incur the cost for the second opinion due by the member.
- G. The Plan shall notify the member and provider of any denial for a second opinion in writing within the appropriate timeframe per regulation. Information on how to file a grievance or appeal is included.

#### III. Responsibilities

Health Services follows the Second Opinion policy and procedure as directed and reviewed on an annual basis.

#### IV. References

- .CA.gov. (2016, February 11). Retrieved February 22, 2015, from California Department of Managed HealthCare: https://www.dmhc.ca.gov/
- .*Medicare Coverage Data Base*. (2016, February 07). Retrieved February 07, 2016, from CMS.gov: https://www.cms.gov/medicare-coverage-database/

NCQA Guidelines. (2016, Februrary 22). Washington, DC, U.S.A.

.HS.01 Prior Authorization

# V. Approval/Revision History

First Level Approval			Second Level Approval		
Signature			Signature		
Dang Huynh, PhamD			Laurie Nakahira, DO		
Name			Name		
Director,	Pharmacy & Utilizatio	n Management	СМО		
Title			Title		
Version	Change (Original/	<b>Reviewing Committee</b>		Board Action/Date	
Number	Reviewed/ Revised)	(if applicable)	(Recommend or Approve)	(Approve or Ratify)	
V1	Original	Utilization Management	Approved 01/18/2017		
V1	Reviewed	<b>Utilization Management</b>	Approved 01/17/2018		
V1	Reviewed	<b>Utilization Management</b>	Approved 01/16/2019		
V2	Revised	<b>Utilization Management</b>	Approved 01/15/2020		
V2	Reviewed	Utilization Management	Approved 01/20/2021		
V3	Revised	<b>Utilization Management</b>			



Policy Title:	Inter-Rater Reliability	Policy No.:	HS.09
Replaces Policy Title (if	N/A	Replaces Policy No. (if	N/A
Issuing Department:	Health Services	Policy Review	Annually
Lines of Business (check all that	⊠Medi-Cal	⊠смс	

To outline Santa Clara Family Health Plan (SCFHP)'s process for Inter-Rater Reliability (IRR) testing to ensure accurate and consistent application of medical necessity criteria and guidelines.

#### II. Policy

SCFHP evaluates the consistency with which clinical and non-clinical staff involved with any level of applying Utilization Management (UM) criteria in decision making at least annually. When a staff member is found to not be proficient, corrective measures will be pursued.

A. IRR testing will include Medical and Behavioral Health

- 1. At least 10 hypothetical cases are presented to include a combination of:
  - a. Approved and denied prior authorization requests
  - b. Requiring non-clinician and/or clinician review
  - c. Outpatient and inpatient services
- 2. Reviewers will include all temp, interim, and permanent UM staff and any Health Services staff that are involved in prior authorization decision making: care coordinators, personal care coordinators, licensed nurses, social workers, pharmacists, medical directors, and chief medical office.

#### **B.** Review

- 1. Identical cases are distributed to each reviewer
- 2. The reviewer completes the review individually on paper or computerized template as if it was a real-time review
- 3. All cases will be reviewed by UM Management for a consensus decision-making within 1 week following due date.
- 4. Each item is worth one point.
- 5. 80% is considered a passing score.
  - a. Below Proficient (<80%)
    - i. A corrective action plan will be implemented by UM Management. The plan includes the following:
      - a) Training in the area identified to be deficient
      - b) Re-testing after training complete to ensure compliance
### POLICY

- c) Oversight of employee determinations, including coaching and observation as appropriate
- d) Repeat of process as needed
- e) Possible escalation to individualized Performance Improvement Plan (PIP) which will be part of employee's personnel file.

#### III. Records

All results and internal Corrective Action Plans (CAPS) remain confidential and are maintained within Health Services and are reported to the UMC.

#### IV. Responsibilities

Health Services coordinates with both internal and external stakeholders in development and administration of IRR testing at least bi-annually in an effort to ensure consistency amongst staff for UM criteria.

#### V. Reference

National Committee for Quality Assurance. 2020 HP Standards and Guidelines - UM 2: Clinical Criteria for UM Decision, Element C.

#### VI. Approval/Revision History

	First Le	vel Approval	Second Level Approval		
Signature			Signature		
Dang Huy	nh, PhamD		Laurie Nakabira, DO		
Dang nuy			Laurie Nakahira, DO		
Name			Title		
Director, P	harmacy & Utilization N	/lanagement	СМО		
Version	Change (Original/	<b>Reviewing Committee</b>	Committee Action/Date	Board Action/Date	
Number	Reviewed/Revised)	(if applicable)	(Recommend or Approve)	(Approve or Ratify)	
V1	Original	Utilization Management	Approved 01/18/2017		
V1	Reviewed	Utilization Management	Approved 01/17/2018		
V1	Reviewed	Utilization Management	Approved 01/16/2019		
V2	Revised	Utilization Management	Approved 01/15/2020		
V3	Revised	Utilization Management	Approved 10/14/2020		
V3	Reviewed	Utilization Management	Approved 01/20/2021		
V4	Revised	Utilization Management			



Policy Title:	Financial Incentives (Prohibition of)		Policy No.:	HS.10
Replaces Policy Title (if applicable):	None		Replaces Policy No. (if applicable):	None
Issuing Department:	Health Services		Policy Review Frequency:	Annually
Lines of Business (check all that apply):	I Medi-Cal		IC	

#### I. Purpose

To define Santa Clara Family Health Plan (SCFHP)'s provision of clear directives prohibiting financial incentives for Utilization Management (UM) determinations.

#### II. Policy

- A. SCFHP does not reward determination makers or other individuals for any UM review and determinations. Providers, practitioners and members are notified of this policy through the Member Handbook and Provider Manual, which are also available on the SCFHP's website.
- B. The Plan, at no time, provides financial or other incentives for UM determinations. UM staff make approval, modified and denial determinations based strictly on the appropriateness of care or service and existence of coverage for medical necessity against medical criteria, guideline, protocol, policy, procedures and SCFHP Member Handbook.
- C. The Plan never specifically rewards practitioners or other individuals to deny, limit, or discontinues medically necessary covered services.
- D. The Plan does not encourage determinations that result in underutilization of care or services.
- E. SCFHP staff and providers are notified annually of the Plan policy of prohibition for financial or other incentives for UM determinations.

#### III. Responsibilities

All internal, contracted staff and vendors involved with UM activities are notified of the policy prohibiting financial incentives for UM decisions. IT and Benefits ensure the appropriate criteria/benefits are in place for appropriate decision making.

#### IV. References

3 Way Contract. Contract Between United States Department of Health and Human Services; Centers for Medicare and Medicaid Services and California Department of Health Care Services.

### V. Approval/Revision History

	F	irst Level Approval	Second Level Approval		
Signature			Signature		
Dang Huy	ynh, PhamD		Laurie Nakahira, DO		
			· · · · · · · · · · · · · · · · · · ·		
Name			Name		
Director,	Pharmacy & Utiliz	ation Management	СМО		
Title			Title		
Version	Change	<b>Reviewing Committee</b>	<b>Committee Action/Date</b>	<b>Board Action/Date</b>	
Number	(Original/	(if applicable)	(Recommend or	(Approve or Ratify)	
	Reviewed/		Approve)		
	Revised)				
V1	Original	Utilization Management	Approved 01/18/2017		
V1	Reviewed	Utilization Management	Approved 01/17/2018		
V1	Reviewed	Utilization Management	Approved 01/16/2019		
V2	Revised	Utilization Management	Approved 01/15/2020		
V2	Reviewed	Utilization Management	Approved 01/20/2021		
V3	Revised	Utilization Management			



Policy Title:	Informed Consent		Policy No.:	HS.11
Replaces Policy Title (if applicable):	Informed Consent Policy		Replaces Policy No. (if applicable):	PPQI-04C
Issuing Department:	Health Services		Policy Review Frequency:	Annually
Lines of Business (check all that apply):	⊠ Medi-Cal ⊠ CN		IC	

#### I. Purpose

To define and standardize Santa Clara Family Health Plan's (SCFHP) provider requirements for obtaining, documenting and storing informed member's consent.

#### II. Policy

SCFHP recognizes that it is necessary for members to be aware of risks and benefits of treatment and options available. It is Plan's policy that members be well informed, and that their consents for certain high risk procedures/services as well as reproductive health services will be obtained, properly recorded and stored in the member's medical record.

#### III. Responsibilities

SCFHP's Health Services developed and maintains the policy on Informed Consent. The Utilization Management Committee adopts and reviews the policy. Provider Relations and Marketing provide information to members and providers via the web site. Quality Improvement reviews medical records for necessary documentation.

#### IV. References

DHCS Renewed Contract; Exhibit A, Attachment 4, Medical Records, 6) Knox Keene**§ 1363.02.** Reproductive health services information; statement

#### V. Approval/Revision History

First Level Approval	Second Level Approval
Signature	Signature
Dang Huynh, PhamD	Laurie Nakahira, DO
Name	Name
Director, Pharmacy & Utilization Management	СМО

#### POLICY Title Title **Board Action/Date** Version Change (Original/ **Reviewing Committee Committee Action/Date** Number **Reviewed/ Revised)** (if applicable) (Recommend or (Approve or Ratify) Approve) V1 Original **Utilization Management** Approved 01/18/2017 Approved 01/17/2018 V1 Reviewed **Utilization Management** V1 Reviewed **Utilization Management** Approved 01/16/2019 V1 Reviewed **Utilization Management** Approved 01/15/2020 V1 **Utilization Management** Approved 01/20/2021 Reviewed V2 Revised **Utilization Management**



Policy Title:	Preventive Health Guidelines		Policy No.:	HS.12
Replaces Policy Title (if applicable):	Pediatric Preventive Health Services Adult Preventive Health Services		Replaces Policy No. (if applicable):	QM003_02 QM004_02
Issuing Department:	Health Services		Policy Review Frequency:	Annually
Lines of Business (check all that apply):	🖾 Medi-Cal	i-Cal 🛛 CM		

#### I. Purpose

To define Santa Clara Family Health Plan's (SCFHP) process in Preventive Health Guideline adoption, promotion and management.

#### II. Policy

- A. SCFHP's guidelines are intended to help clinicians, practitioners and members to make informed determinations of appropriate preventive health care. This includes guidelines for perinatal care, children up to 24 months, 2-19 years, adults 20-64 years, or 65 or more years old.
- B. The Utilization Management Committee (UMC) reviews, and adopts preventive health guidelines that define standards of practice as they pertain to promoting preventive health services. Whenever possible, guidelines are derived from nationally recognized sources as evidenced-based practice. They are based on scientific evidence, professional standards or an expert opinion in the absence of the availability of professional standards. The preventive health guidelines are reviewed, and updated when updates are released by the issuing entity. SCFHP expects its practitioners to utilize the adopted guidelines in their practices, and recognizes the inability of the guidelines to address all individual member circumstances.

#### III. Responsibilities

Preventive health guidelines are reviewed periodically. Guidelines are available to providers and members on SCFHP's website.

#### IV. Approval/Revision History

First Level Approval	Second Level Approval
Signature	Signature
Dang Huynh, PhamD	Laurie Nakahira, DO
Name	Name
Director, Pharmacy & Utilization Management	СМО
Title	Title

Version Number	Change (Original/ Reviewed/ Revised)	Reviewing Committee (if applicable)	Committee Action/Date (Recommend or Approve)	Board Action/Date (Approve or Ratify)
V1	Original	<b>Utilization Management</b>	Approved 01/18/2017	
V1	Reviewed	Utilization Management	Approved 01/17/2018	
V1	Reviewed	Utilization Management	Approved 01/16/2019	
V2	Revised	Utilization Management	Approved 01/15/2020	
V2	Reviewed	Utilization Management	Approved 01/20/2021	
V3	Revised	Utilization Management		



Policy Title:	Transportation Services		Policy No.:	HS.13
Replaces Policy Title (if applicable):	Non-Emergency Medical and Non-Medical Transportation Services		Replaces Policy No. (if applicable):	HS.14
Issuing Department:	Health Services		Policy Review Frequency:	Annually
Lines of Business (check all that apply):	🖾 Medi-Cal	⊠ CN	1C	

#### I. Purpose

To define Santa Clara Family Health Plan's (SCFHP) coverage for emergency, non-emergency medical (NEMT) and non-medical transportation services (NMT).

#### II. Policy

- A. Emergency medical transportation does not require prior authorization.
- B. Non-Emergency Medical Transportation (NEMT) Services may require prior authorization under outlined as below circumstances:
  - 1. NEMT services are a covered Medi-Cal benefit when a member needs to obtain medically necessary covered services, and when prescribed in writing by a physician, dentist, podiatrist or mental health or substance use disorder provider.
  - SCFHP will use a DHCS approved physician certification statement (PCS) form to determine the appropriate level of service. Once the member's treating physician prescribes the form of transportation, SCFHP will not modify the authorization. PCS form must be completed before NEMT can be prescribed and provided.
  - 3. NEMT services require prior authorization for transfer from hospital to home, home to doctor's office, clinics, and medical appointments.
  - 4. NEMT does not require prior authorization for from an acute care hospital, immediately following an inpatient stay at the acute level of care, to a skilled nursing facility or an intermediate care facility. SCFHP will make our best effort to refer for and coordinate NEMT for carved out services.
  - 5. Medical professional's decisions regarding NEMT will be unhindered by fiscal and administrative management. SCFHP will authorize, at a minimum, the lowest cost type of NEMT transportation that is adequate for the member's medical needs. There are no limits to receiving NEMT as long as the member's medical services are medically necessary and the NEMT has a prior authorization with PCS form.
  - 6. SCFHP will provide medically appropriate NEMT services when the member's medical and physical condition is such that the transport by ordinary means of public or private conveyance is medically contraindicated, and transportation is required for obtaining medically necessary services. The plan will provide NEMT for members who cannot reasonably ambulate, or are unable to stand or walk without assistance, including those using a walker or crutches. The plan will ensure door-to-door assistance for all members receiving NEMT services.

### POLICY

- 7. SCFHP will provide transportation for a parent or a guardian when the member is a minor. With written consent of a parent or guardian, SCFHP will arrange NEMT for a minor who is unaccompanied by a parent or guardian. SCHFP will provide transportation services for unaccompanied minors when applicable state or federal law does not require parental consent for the minor's service.
- 8. SCFHP will provide the NEMT transportation to Major Organ Transplant donors without required prior authorization.
- 9. SCFHP will provide the following four available modalities of NEMT when the member's medical and physical condition is such that transport by ordinary means of public or private conveyance is medically contraindicated and transportation is required for the purpose of obtaining needed medical care:
  - a. Ambulance services
  - b. Litter van services
  - c. Wheelchair van services
  - d. Air
- 10. SCFHP will capture and submit data from the PCS form to DHCS.
- C. Non-Medical Transportation (NMT) Services
  - SCFHP will provide NMT for members to obtain medically necessary services like primary care and specialty appointments, mental health, substance use disorder, dental and other services covered by SCFHP. In addition, SCFHP will also provide NMT for any other benefits delivered through the Medi-Cal FFS delivery system.
  - 2. NMT does not include transportation of the sick, injured, invalid, convalescent, infirm, or otherwise incapacitated members who need to be transported by ambulances, litter vans, or wheelchair vans.
  - 3. SCFHP will provide round trip-transportation for a member to obtain covered and carved out Medi-Cal services by passenger car, taxicab, or any other form of public or private conveyance.
  - 4. SCFHP will provide NMT transportation to Major Organ Transplant donors
  - 5. The NMT must be the least costly method of transportation that meets the member's needs.
  - 6. As a Member Services Guide, SCFHP will include information in SCFHP Member Handbook on the procedures for obtaining NMT services, a description of NMT services and the conditions under which NMT is available.
  - 7. NMT coverage includes transportation costs for the member and one attendant, such as a parent, guardian, or spouse, to accompany the member in a vehicle or on public transportation.
  - 8. SCFHP will provide transportation for a parent or a guardian when the member is a minor. With written consent of a parent or guardian, SCFHP will arrange NMT for a minor who is unaccompanied by a parent or guardian. SCHFP will provide transportation services for unaccompanied minors when applicable state or federal law does not require parental consent for the minor's service.
  - 9. SCFHP will provide mileage reimbursement consistent with the IRS rate for medical purposes when conveyance is in a private vehicle arranged by the member. The member must attest in person, electronically, or over the phone that other transportation resources have been reasonably exhausted. In order to receive gas mileage reimbursement for use of a private vehicle, the driver must have a valid driver's license, valid vehicle registration, and valid vehicle insurance.
  - 10. NMT does not cover trips to a non-medical location or for appointments that are not medically necessary.
- D. SCFHP will meet DHCS contractually required timely access standards for NEMT and NMT.

#### III. Responsibilities

Health Services will review prior authorization for NEMT. Customer Services will coordinate NMT and NEMT. Provider Network Management will educate the provider network on NEMT and NMT benefits and requirements.

#### IV. References

APL 17-010 Non-Emergency Medical and Non-Medical Transportation Services

### V. Approval/Revision History

First Level Approval				Second Level Approval		
<u></u>			<u></u>			
Signature			Sig	nature		
Dang Huy	nh, PhamD		Lau	urie Nakahira, DO		
Name			Na	me		
Director	Dharmaay 8 Utilization	Managamant		10		
Title	Pharmacy & Utilizatior		CMO Title			
nue			m			
Version	Change (Original/	<b>Reviewing Committee</b>		Committee Action/Date	<b>Board Action/Date</b>	
Number	Reviewed/ Revised)	(if applicable)	(Recommend or (Approve or Ratif			
				Approve)		
V1	Original	Utilization Management		Approved 01/16/2019		
V2	Revised	Utilization Management		t Approved 01/15/2020		
V2	Reviewed	Utilization Management	t Approved 01/20/2021			
V3	Revised	Utilization Management				



Policy Title:	System Controls		Policy No.:	HS.14
Replaces Policy Title (if applicable):	N/A		Replaces Policy No. (if applicable):	N/A
Issuing Department:	Health Services		Policy Review Frequency:	Annually
Lines of Business (check all that apply):	⊠ Medi-Cal ⊠ CN		1C	

#### I. Purpose

To describe Santa Clara Family Health Plan's (SCFHP) system controls specific to Utilization Management (UM) denial and appeal notification and receipt dates.

#### II. Policy

- A. Turnaround times (TAT) for requests are based on the date and time of receipt
  - 1. Due date and time of reviews, depending on the type of request, is calculated from the date and time the request was received by the UM department. Refer to HS.01 Prior Authorization and HS.01.01 Prior Authorization Process.
- B. Written notification of decisions will be sent to the member and provider within the appropriate turnaround timeframe of the type of request based on the receipt date and time of the faxed request
- C. The UM department only uses the date and time stamp found on the bottom of the faxed document, or when the provider submitted the request by the web portal application upon received by UM as the receipt date and time. The receipt date and time is not to be modified.
  - 1. At the time of data-entry, the UM staff will enter the receipt date and time of the request into the UM platform, QNXT, to automatically calculate the due date and time based on type of request and line of business
- D. Quality Assurance reports are run monthly and as needed to cross check accuracy of data entry from the receipt date to the recorded information in the UM platform.

#### III. Responsibilities

Health Services collaborates with IT to ensure the information received on the faxed document is accurately reflected in the UM platform.

#### IV. References

.National Committee for Quality Assurance. 2020 HP Standards and Guidelines: UM 12: UM System Controls

- . HS.01 Prior Authorization
- . HS.01.01 Prior Authorization Process

### V. Approval/Revision History

First Level Approval				Second Level Appr	oval
Signature			Signature		
Dang Huynh, Pham	D		Laurie Nakahira	a, DO	
Name			Name		
Director, Pharmacy	& Utilization	Management	СМО		
Title			Title		
	e (Original/	Reviewing Committee		ttee Action/Date	Board Action/Date
Number Review	ed/ Revised)	(if applicable)	(Recom	mend or Approve)	(Approve or Ratify)
V1 0	riginal	Utilization Management	Appro	ved 01/15/2020	
V1 Re	viewed	Utilization Management	Appro	ved 01/20/2021	
V2 R	evised	Utilization Management			



# **Care Coordinator Guidelines**



# TABLE OF CONTENTS

Overview	2
Inpatient Acute Hospitalization	3
Skilled Level of Care (SNF)	7
Long Term Care	9
Bed Hold	11
Home Health	12
Hospice Room and Board for NCP	13
Hearing Aid	15
Hearing Aid Repair	16
Community Based Adult Services (CBAS)	17
Outpatient Physical, Occupational and Speech Therapy	19
Wheelchair Repair	20
Non-Emergency Transportation	21
Behavioral Health Treatment (BHT)	22



# **OVERVIEW**

Care Coordinators may review a select number of prior authorization requests based upon criteria set forth in these guidelines and applicable to only these type of services in accordance with the Santa Clara Family Health Plan (SCFHP) Utilization Management Program.

Care Coordinators may approve prior authorization requests when criteria are met. Care Coordinators are responsible to document all pertinent information to support approval. This includes, but is not limited to, accurately and fully completing authorization entry in QNXT with the type of medical service request and criteria name. All reviews must be completed within the regulatory timeframes for making the determination.

Care Coordinators must refer requests for medical service requiring authorization that do not meet the criteria within these guidelines to a licensed nurse, licensed Behavioral Health clinician, or Medical Director.

Care Coordinator Guidelines are reviewed and approved by the SCFHP Utilization Management Committee annually.



### **INPATIENT ACUTE HOSPITALIZATION**

- 1. Emergency or Observational Non-inpatient Admission Stay:
  - <u>Medi-Cal</u> In-area: No prior authorization required Out-of-Area: No prior authorization required

#### Cal MediConnect

In-area: No prior authorization required Out-of-Area: No prior authorization required

- 2. Emergency Inpatient Admission:
  - a. Medi-Cal

#### In-area:

- SCFHP Direct: approve 1 day
- Northeast Medical Services: redirect to NEMS
- VHP Network: redirect to Valley Health Plan
- Palo Alto Medical Foundation: approve 1 day
- Kaiser: redirect to Kaiser
- Physician Medical Group: redirect to PMG
- Premier Care: redirect to PCNC

Out-of-area:

- SCFHP Direct: approve 1 day
- Northeast Medical Services: approve 1 day
- VHP Network: redirect to Valley Health Plan
- Palo Alto Medical Foundation: approve 1 day
- Kaiser: redirect to Kaiser
- Physician Medical Group: approve 1 day
- Premier Care: approve 1 day

Retro Request for non-delegated members with discharge date: Send to Nurse for Review

#### b. Cal MediConnect

In-area: Approve 1 day Out-of-Area: Approve 1 day Retro Request w/ Discharge Date: Send to Nurse for Review



- 3. Inpatient Elective/Scheduled Admission:
  - a. Medi-Cal
    - In-area:
      - SCFHP Direct
        - Active PA: Create Copy Auth and Nurse Review
        - No Active PA: Nurse Review
      - Northeast Medical Services
        - Approved NEMS PA: Nurse Review for LOA
        - No NEMS PA: redirect to NEMS
      - VHP Network PA: redirect to Valley Health Plan
      - Kaiser: redirect to Kaiser
      - Palo Alto Medical Foundation
        - Active PA: Create Copy Auth and Nurse Review
        - No Active PA: Nurse Review
      - Physician Medical Group:
        - Approved PMG PA: Nurse Review for LOA
        - No PMG PA: redirect to PMG
      - Premier care
        - Approved PCNC PA: Nurse Review for LOA
        - No PCNC PA: redirect to PCNC

#### Out-of-Area:

- SCFHP Direct: Nurse Review
- Northeast Medical Services: Nurse Review
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Nurse Review
- Physician Medical Group: Nurse Review
- Premier Care: Nurse Review

Retro Request: Nurse Review

#### b. Cal MediConnect

In-area: Nurse Review Out-of-Area: Nurse review Retro Request: Nurse review



- 4. Acute Rehabiliation or Long-Term Acute Care (LTACH)
  - a. <u>Medi-Cal</u>
    - In-area:
      - SCFHP Direct: Nurse Review
      - Northeast Medical Services: Redirect to NEMS
      - VHP Network: Redirect to Valley Health Plan
      - Kaiser: Redirect to Kaiser
      - Palo Alto Medical Foundation: Nurse Review
      - Physician Medical Group: Redirect to PMG
      - Premier Care: Redirect to PCNC

#### Out-of-Area:

- SCFHP Direct: Nurse Review
- Northeast Medical Services: Nurse Review
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Nurse Review
- Physician Medical Group: Nurse Review
- Premier Care: Nurse Review

Retro Request (Non-Delegated): Nurse Review

#### b. Cal MediConnect

In-Area & Out-of-Area: Nurse Review Retro: Nurse Review

#### 5. Maternity

#### a. Medi-Cal:

In-area:

- SCFHP Direct: Approve as below
- Northeast Medical Services: Redirect to NEMS
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC



Out-of-Area:

- SCFHP Direct: Approve as below
- Northeast Medical Services: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Approve as below
- Premier Care: Approve as below

Retro Request (Non-Delgated): Approve as below

#### b. Cal MediConnect:

In-area, Out-of-Area, Retro: Approve as below

Maternity Approval Process:

- Add Maternity Kick Attribute Group in authorization;
- Approve for: 2 days for vaginal delivery, 4 days for C-Section delivery

   Exceeding days must be send to Nurse for review.
- Approval date starts from the date of baby's birth/date of delivery.
  - Admission date different from Baby's date of birth must be forwarded to Nurse for review.



# **SKILLED LEVEL OF CARE (SNF)**

### Medi-Cal

In-area:

- SCFHP Direct: Approve as below
- Palo Alto Medical Foundation: Approve as below
- Northeast Medical Services, VHP Network, Kaiser, Physician Medical Group, Premier Care:
  - Redirect to delegate if within month of admission and month after admission.
  - SCFHP will be financially responsible beginning 3rd month of admission. Approve as below.
- Medicare Primary A, AB, C, CD:
  - Provider sends copy of NOMNC or screen shot of the Noridian Medicare Portal showing that the member has exhausted 100 SNF days per the benefit period:
    - Approve for up to 7 days of OT, PT, ST Skilled Care
    - Send to Nurse for Review
- Medicare Primary A only:
  - Approve for up to 7 days of OT, PT, ST Skilled Care
  - Send to Nurse for Review
- Medicare Primary B only:
  - Approval for length of request
  - Assign to \*Q-UM Room & Board Auths queue

#### Out-of-Area:

- SCFHP Direct: Send to Nurse review for LOA
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3<sup>rd</sup> month of admission
- Palo Alto Medical Foundation: Send to Nurse review for LOA
- Physician Medical Group: Send to Nurse review for LOA
- Premier Care: Send to Nurse review for LOA
- Northeast Medical Services: Send to Nurse review for LOA



- Medicare Primary A only:
  - Send to Nurse review for LOA
- Medicare Primary B only:
  - Send to Nurse review for LOA

Retro request for all lines of business with discharge date exceeding 7 days send to Nurse for review with the exception of Medicare Primary Part B only

#### Cal MediConnect

- In-area: Approve for up to 7 days for Level I or Level II
  - Level III pend to Nurse for review
  - Additional days for all Levels of concurrent review pend to Nurse for review
- Out-of-Area: Send to Nurse review for LOA

Skilled Level of Care Approval Process:

- Approved for up to 7 days of OT, PT, ST Skilled Care
- Additional days and concurrent review pend to Nurse for review

#### Definition:

#### Medicare Primary SNF Covered Days: 100 SNF Days

**Benefit Period:** A benefit period begins the day the member is admitted as an inpatient in a hospital or SNF. The benefit period ends when the member has not received any inpatient hospital care or skilled care in a SNF for 60 days in a row. If the member goes into a hospital or a SNF after one benefit period has ended, a new benefit period begins. There is no limit to the number of benefit periods.



# LONG TERM CARE

### Medi-Cal

In-area

- SCFHP Direct: Approve as below
- VHP Network: VHP Long Term Custodial Care services become the financial responsibility of SCFHP on the 1st day of the month following admission if VHP submits the Enrollee reassignment request to SCFHP before that date.
- Kaiser: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3<sup>rd</sup> month of admission
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3<sup>rd</sup> month of admission
- Premier Care: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3<sup>rd</sup> month of admission
- Northeast Medical Services: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3rd month of admission

#### Out-of-Area:

- SCFHP Direct: Send to Nurse for review for denial as non- covered benefit.
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Send to Nurse for review for denial as non- covered benefit.
- Physician Medical Group: Send to Nurse for review for denial as non- covered benefit.
- Premier Care: Send to Nurse for review for denial as non- covered benefit.
- Northeast Medical Services: Send to Nurse for review for denial as non- covered benefit.



### Cal MediConnect

- In-area: Approve as Below
- Out-of-Area: Send to Nurse for review

Retro request for all lines of business approve as below

Long Term Care Approval Process:

- Authorization must include:
  - Face Sheet
  - Care Plan (Treatment Plan, Discharge Plan, etc.)
  - Medicare Denial Letter (if applicable)
  - Physician's Current Orders, Signed and Dated
- Approve initial authorization for 6 months
- Send to Nurse for review assign "in process" status and send authorization letter
- LTC Re-Authorization:
  - For member in LTC 2 years or more
    - Approve 1 year with complete LTC authorization with required documentation
    - Send to Nurse for review under "in process" status and send authorization letter
  - For member in LTC 2 years or less
    - Send to Nurse for review



# BED HOLD

For members who are at a Skilled Nursing Facility for LTC/Custodial or Skilled Nursing:

### Medi-Cal:

In-area

- SCFHP Direct: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser (verify Custodial admission date)
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC
- Northeast Medical Services: Redirect to NEMS

### Out-of-area

- SCFHP Direct: Send to Nurse for review
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser (verify Custodial admission date)
- Palo Alto Medical Foundation: Send to Nurse for review
- Physician Medical Group: Send to Nurse for review
- Premier Care: Send to Nurse for review
- Northeast Medical Services: Nurse for review

#### Cal MediConnect:

In-area: Approve as below Out-of-Area: Send to Nurse for review

Retro request for all lines of business approve as below

Bed Hold Approval Process:

- Approve up to 7 days
- In a separate authorization exceeding days must be send to Nurse for review
  - Add discharge to current authorization
  - Requires new authorization upon return



# HOME HEALTH

### Medi-Cal:

In-area

- SCFHP Direct: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC
- Northeast Medical Services: Redirect to NEMS

#### Out-of-area

- SCFHP Direct: Send to Nurse for review
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Send to Nurse for review
- Physician Medical Group: Send to Nurse for review
- Premier Care: Send to Nurse for review
- Northeast Medical Services: Send to Nurse for review

#### Cal MediConnect:

In-area: Approve as below Out-of-Area: Send to Nurse for review

Retro request for all lines of business send to Nurse for review

Home Health Approval Process:

- Approve up to 18 visits on initial/first request (combination of services: PT, OT, ST, HHA, SN, MSS)
- Clinical information must include:
  - Plan of care
  - MD order
- Initial/first request exceeding 18 visits send to Nurse for review
- Ongoing Home Health services send to Nurse for review



### HOSPICE ROOM AND BOARD FOR NON-CONTRACTED PROVIDERS

### Medi-Cal:

In-area

- SCFHP Direct: Approve as below
- VHP Network: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3rd month of admission
- Kaiser: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3rd month of admission
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3rd month of admission
- Premier Care: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3rd month of admission
- Northeast Medical Services: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3rd month of admission

#### Out-of-area

- SCFHP Direct: Send to Nurse for review
- VHP Network: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3rd month of admission
- Kaiser: Redirect to delegate if within month of admission and month after admission. SCFHP will be financially responsible beginning 3rd month of admission
- Palo Alto Medical Foundation: Send to Nurse for review
- Physician Medical Group: Send to Nurse for review
- Premier Care: Send to Nurse for review
- Northeast Medical Services: Send to Nurse for review



### Cal MediConnect:

In-area: Approve as below Out-of-Area: Approve as below

Retro request for all lines of business approve as below

Hospice Room and Board Approval Process:

- Contracted Hospice providers do not require authorization and can bill Claims directly
- Room and board authorization must be requested by Hospice agency and not by Skilled Nursing Facility
- Approve up to 90 days
- Authorization must include Hospice admission notification
- Additional days exceeding 90 days require a new hospice certification order
  - Approve up to 90 days
- Authorization are reimbursed with Medi-Cal rates
  - No letter of agreement (LOA) will be processed



# **HEARING AID**

### Medi-Cal:

In-area

- SCFHP Direct: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC
- Northeast Medical Services: Redirect to NEMS

#### Out-of-area

- SCFHP Direct: Send to Nurse for review
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Send to Nurse for review
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC
- Northeast Medical Services: Redirect to NEMS

#### Medi-Medi:

- SCFHP Direct: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC
- Northeast Medical Services: Redirect to NEMS

### Cal MediConnect:

In-area: Approve as below Out-of-Area: Send to Nurse for review

Retro request for all lines of business approve as below

Hearing Aid Process:

• Approve up to 2 hearing aids and molds

Authorization must include current audiology exam by Audiologist



# **HEARING AID REPAIR**

Med	i-Cal	-
-		

In-area

- SCFHP Direct: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC
- Northeast Medical Services: Redirect to NEMS

### Out-of-area

- SCFHP Direct: Send to Nurse for review
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Send to Nurse for review
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC
- Northeast Medical Services: Redirect to NEMS

### Medi-Medi:

- SCFHP Direct: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC
- Northeast Medical Services: Redirect to NEMS

### Cal MediConnect:

In-area: Approve as below Out-of-Area: Send to Nurse for review

Retro request for all lines of business approve as below

### Hearing Aid Repair Process:

- Approve up to 2 hearing aids devices
- Authorization must include information of current hearing aids and reason for repair
- a. Purchase date
- b. Serial number

Page 16 of 14



# Utilization Management Care Coordinator Guidelines Community Based Adult Services (CBAS)

### Medi-Cal & Cal Medi-Connect

In-Network:Review belowOut-of-Network:Forward to Nurse for Non-Covered Benefit Review

Authorization Guidelines:

### Initial Request:

- Member is at least 18 years of age
- History and Physical Examination (H&P) within the last 12 months
- Completed Individual Plan of Care (IPC) DHCS 0020 Form
- IPC includes multidisciplinary team and program Director signatures
- IPC confirms one of the following: Category 1, 2, 3, 4, or 5
- IPC planned days per week matches request
- Request does not exceed 5 days per week
- Request does not exceed 12 months
- Approval:
  - 12 months
  - Up to 1 unit for Multidisciplinary Evaluation (H2000)
  - Up to 5 days per week (S5102)

### Additional Days Request:

- Updated Individual Plan of Care (IPC) DHCS 0020 Form
- IPC includes multidisciplinary team and program Director signatures
- IPC confirms one of the following: Category 1, 2, 3, 4, or 5
- IPC planned days per week matches request
- Request does not exceed 5 days per week
- Request does not exceed 12 months Approval:
  - 12 months
  - Up to 5 days per week (S5102)



### **Reauthorization Request:**

- Updated Individual Plan of Care (IPC) DHCS 0020 Form
- IPC includes multidisciplinary team and program Director signatures
- IPC confirms one of the following: Category 1, 2, 3, 4, or 5
- IPC planned days per week matches request
- Request does not exceed 5 days per week
- Request does not exceed 12 months Approval:
  - 12 months
  - Up to 1 unit for Multidisciplinary Evaluation (H2000)
  - Up to 5 days per week (S5102)



### **OUTPATIENT THERAPY**

### Medi-Cal:

In-area

- SCFHP Direct: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC
- Northeast Medical Services: Redirect to NEMS

Out-of-area

- SCFHP Direct: Send to Nurse for review
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Send to Nurse for review
- Physician Medical Group: Send to Nurse for review
- Premier Care: Send to Nurse for review
- Northeast Medical Services: Send to Nurse for review

### Cal MediConnect:

In-area: Approve as below Out-of-Area: Send to Nurse for review

Retro request for all lines of business send to Nurse for review

Outpatient Therapy Process:

- Approve up to 18 visits on initial/first request (combination of services: PT, OT, ST)
- Authorization must include:
  - MD order
  - Documentation must include "MD order received"
- Initial/first request exceeding 18 visits send to Nurse for review
- Ongoing Outpatient Therapy request send to Nurse for review
  - Treatment plan and most recent progress notes required

Note: All outpatient therapies approved for members that are less than 21 years old must be forwarded to the Medical Review Nurse for CCS referral via email including member's ID, name, and auth number.



# WHEELCHAIR REPAIR

### Medi-Cal:

In-area

- SCFHP Direct: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Redirect to PMG
- Premier Care: Redirect to PCNC
- Northeast Medical Services: Redirect to NEMS

### Out-of-area

- SCFHP Direct: Send to Nurse for review
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Send to Nurse for review
- Physician Medical Group: Send to Nurse for review
- Premier Care: Send to Nurse for review
- Northeast Medical Services: Send to Nurse for review

### Cal MediConnect:

In-area: Approve as below Out-of-Area: Send to Nurse for review

Retro request for all lines of business approve as below

Wheelchair Repair Process:

- Wheelchair must be 3 years old or less
- Authorization must include:
  - Wheelchair information (manual or powered)
  - List of items for repair



### **NON-EMERGENCY TRANSPORTATION**

#### Medi-Cal:

In-area

- SCFHP Direct: Approve as below
- VHP Network: Approve as below
- Kaiser: Redirect to Kaiser (verify Custodial admission date)
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Approve as below
- Premier Care: Approve as below
- Northeast Medical Services: Approve as below

#### Out-of-area

- SCFHP Direct: Send to Nurse for review
- VHP Network: Send to Nurse for review
- Kaiser: Redirect to Kaiser (verify Custodial admission date)
- Palo Alto Medical Foundation: Send to Nurse for review
- Physician Medical Group: Send to Nurse for review
- Premier Care: Send to Nurse for review
- Northeast Medical Services: Send to Nurse for review

#### **Medicare Part B:**

- Covers Facility to Facility

### Cal MediConnect:

In-area: Approve as below Out-of-Area: Send to Nurse for review

Retro request for all lines of business approve as below

Non-Emergency Transportation Process:

- Provider must send a complete Physician Certification Statement (PCS)
- Non-emergency ground transportation approve x 2 per month for up to 1 year
- Non-emergency ground transportation for dialysis approve x 2 per day for up to 1 year
- Non-emergency air transportation
  - Send to Nurse for review

# **BEHAVIORAL HEALTH TREATMENT (BHT)**

#### Medi-Cal:

In-area

- Independent Physicians: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Approve as below
- Premier Care: Approve as below
- Northeast Medical Services: Approve as below

### Out-of-area

- Independent Physicians: send to Manager of Behavioral Health for review
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: send to Manager of Behavioral Health for review
- Physician Medical Group: send to Manager of Behavioral Health for review
- Premier Care: send to Behavioral Health Manager for review
- Northeast Medical Services: send to Behavioral Health Manager for review

#### Medi-Medi:

- Independent Physicians: Approve as below
- VHP Network: Redirect to Valley Health Plan
- Kaiser: Redirect to Kaiser
- Palo Alto Medical Foundation: Approve as below
- Physician Medical Group: Approve as below
- Premier Care: Approve as below
- Northeast Medical Services: Approve as below

Cal MediConnect: In-area: Not Covered Out-of-Area: Not Covered

Retro request for Medi-Cal and Medi-Medi line of business approve as below

Behavioral Health Treatment Process:

- Approve up to 10 hours for initial assessment- code H0031
- Authorization must include a current comprehensive diagnostic evaluation completed by a licensed physician, surgeon or psychologist
- Ongoing Treatment send to BHT Program Manager or RN for review
- Anything above 25 hours/week and/or school setting request send to Manager of Behavioral Health for review
### **Community Based Adult Services (CBAS)**

#### Medi-Cal & Cal Medi-Connect

In-Network: Review below Out-of-Network: Forward to Nurse for Non-Covered Benefit Review

#### Authorization Guidelines:

#### Initial Request:

- Member is at least 18 years of age
- History and Physical Examination (H&P) within the last 12 months
- Completed Individual Plan of Care (IPC) DHCS 0020 Form
- IPC includes multidisciplinary team and program Director signatures
- IPC confirms one of the following: Category 1, 2, 3, 4, or 5
- IPC planned days per week matches request
- Request does not exceed 5 days per week
- Request does not exceed 12 months

#### Approval:

- 12 months
- Up to 1 unit for Multidisciplinary Evaluation (H2000)
- Up to 5 days per week (\$5102)
- In a separate authorization exceeding days must be send to Nurse for review

#### Additional Days Request:

- Updated Individual Plan of Care (IPC) DHCS 0020 Form
- IPC includes multidisciplinary team and program Director signatures
- IPC confirms one of the following: Category 1, 2, 3, 4, or 5
- IPC planned days per week matches request
- Request does not exceed 5 days per week
- Request does not exceed 12 months

Approval:

- 12 months
- Up to 5 days per week (S5102)
- In a separate authorization exceeding days must be send to Nurse for review

#### **Reauthorization Request:**

- Updated Individual Plan of Care (IPC) DHCS 0020 Form
- IPC includes multidisciplinary team and program Director signatures
- IPC confirms one of the following: Category 1, 2, 3, 4, or 5
- IPC planned days per week matches request

- Request does not exceed 5 days per week
- Request does not exceed 12 months

#### Approval:

- 12 months
- Up to 1 unit for Multidisciplinary Evaluation (H2000)
- Up to 5 days per week (\$5102)
- In a separate authorization exceeding days must be send to Nurse for review

01.03.2022 - Reviewed & Approved by L.B., MD SCFHP Medical Director

#### Reference:

DHCS Community-Based Adult Services (CBAS) Provider Manual: <u>https://files.medi-</u> cal.ca.gov/pubsdoco/publications/masters-mtp/part2/community.pdf

Community-Based Adult Services (CBAS): IPC and TAR Form Completion: <u>https://files.medi-cal.ca.gov/pubsdoco/Publications/masters-</u> <u>MTP/Part2/communityipc.pdf</u>

CBAS Billing Codes & Reimbursement Rates: <u>https://files.medi-</u> cal.ca.gov/pubsdoco/publications/masters-mtp/part2/communitycd.pdf



Membership Report



### Membership

#### Source: iCat (01/01/2022)

Mbr 0	Ct Sum	Cap Month					-		-		•	-		
LOB	Network Name	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22
СМС		9,807	9,893	9,880	9,924	9,989	10,080	10,148	10,245	10,325	10,368	10,415	10,431	10,219
	Santa Clara Family Health Plan	9,807	9,893	9,880	9,924	9,989	10,080	10,148	10,245	10,325	10,368	10,415	10,431	10,219
МС		263,093	265,095	266,962	269,043	271,246	272,590	274,030	275,227	276,227	277,198	278,873	280,666	284,439
	ADMIN-MEDI-CAL ONLY							2,088	1,931	1,881	1,992	2,464	2,185	3,833
	ADMIN-MEDICARE PRIMARY	15,941	16,048	16,085	16,094	16,124	16,224	15,925	16,078	16,152	16,240	16,363	16,455	16,502
	KAISER PERMANENTE	30,131	30,557	31,024	31,418	31,885	32,224	32,568	32,864	33,163	33,401	33,651	33,941	34,268
	NEMS										3,445	3,443	3,457	3,452
	PALO ALTO MEDICAL FOUNDATION	7,065	7,143	7,221	7,277	7,338	7,388	7,400	7,378	7,343	7,342	7,356	7,374	7,381
	PHYSICIANS MEDICAL GROUP	45,178	45,466	45,631	45,945	46,224	46,462	46,353	46,561	46,655	42,907	43,165	43,521	43,953
	PREMIER CARE	15,695	15,781	15,852	15,941	15,966	15,981	15,864	15,818	15,805	15,880	15,935	15,975	16,065
	SCFHP DIRECT	16,987	17,132	17,266	17,442	17,510	17,579	17,504	17,592	17,619	17,840	17,915	18,166	18,367
	VHP NETWORK	132,096	132,968	133,883	134,926	136,199	136,732	136,328	137,005	137,609	138,151	138,581	139,592	140,618
Grand	l Total	272,900	274,988	276,842	278,967	281,235	282,670	284,178	285,472	286,552	287,566	289,288	291,097	294,658



### **Over/Under Utilization**



# UMC Goals and Objectives

- Compare SCFHP utilization levels against relevant industry benchmarks and monitor utilization trends among SCFHP membership over time
- Analyze key drivers and potential barriers, prioritize opportunities for improvement, and develop interventions that promote high-quality and cost-effective use of medical services



# Membership

### Source: iCAT (1/12/2022)

Year-Month	2021-07	2021-08	2021-09	2021-10	2021-11	2021-12
Medi-Cal	274,030	275,227	276,227	277,198	278,873	280,666
Cal MediConnect	10,148	10,245	10,325	10,368	10,415	10,431
Total	278,967	281,235	282,670	284,178	285,472	286,552



### Inpatient Utilization: Medi-Cal –SPD DOS 1/1/2021 –12/31/2021

Source: MCL Enrollment & QNXT Claims and Encounter Data (Run Date:1/12/2021)(SPD, no Kaiser no SPD Full Dual

Quarter	Discharges	Discharges / 1,000 Member Months	Days	Average Length of Stay
2021-Q1	820	12.98	4,342	5.29
2021-Q2	890	14.03	4,819	5.41
2021-Q3	925	14.52	5,417	5.86
2021-Q4	1,002	15.76	4,899	4.89
Total	3,637	14.32	19,477	5.36

Note: Data are less complete for more recent quarters due submission lag.



# Inpatient Utilization: Medi-Cal – Non-SPD DOS 1/1/2021 - 12/31/2021

Source: MCL Enrollment & QNXT Claims and Encounter Data (Run Date:1/12/2021)

Quarter	Discharges	Discharges / 1,000 Member Months	Days	Average Length of Stay
2021-Q1	2,438	3.99	10,041	4.12
2021-Q2	2,254	3.57	10,100	4.48
2021-Q3	2,565	3.96	11,940	4.65
2021-Q4	2,737	4.12	11,048	4.03
Total	9,994	3.91	43,129	4.32

Note: Data are less complete for more recent quarters due submission lag.



### Inpatient Utilization: Cal MediConnect (CMC) DOS 1/1/2021 – 12/31/2021

### Source: CMC Enrollment & QNXT Claims Data (Run Date:1/12/2021)

Quarter	Discharges	Discharges / 1,000 Member Months	Days	Average Length of Stay
2021-Q1	506	18.56	3,137	6.19
2021-Q2	545	19.08	2,979	5.47
2021-Q3	582	20.05	3,582	6.15
2021-Q4	557	18.84	3,053	5.48
Total	2,190	19.14	12,751	5.82

Note: Data are less complete for more recent quarters due submission lag.



### Medi-Cal Inpatient Utilization DOS 1/1/2021 – 12/31/2021

	Medi-Cal Population				
Measure	Non-SPD	SPD	Total		
Discharges / 1,000 Member Months	3.91	14.32	4.85		
ALOS	4.32	5.36	4.59		



# Inpatient Readmissions: Medi-Cal

Source: HEDIS Plan All-Cause Readmissions (PCR) data for 2020 and YTD 2021 measurement period (Run Date: 12/19/2021)

Year	LOB	Count of Index Stays (Denominator)	Count of 30- Day Readmissions (Numerator)	Actual Readmissio n Rate <sup>1,2,3</sup>
2020	MC - All	3,977	380	9.55%
2021	MC - All	4,572	409	8.95%

<sup>1</sup> A lower rate indicates better performance.

<sup>2</sup> Only for members aged 18-64 in Medi-Cal.

<sup>3</sup> Outliers are not included in the rates.



### Cal MediConnect (CMC) Readmission Rates

Source: HEDIS Plan All-Cause Readmissions (PCR) data for 2020 and YTD 2021 measurement period (Run Date: 12/19/2021)

Rate Description	PCR 2020	PCR 2021
Count of Index Hospital Stays	943	1,006
Count of 30-Day Readmissions	99	116
Actual Readmission Rate	10.50%	11.53%

<sup>1</sup> A lower rate indicates better performance.

<sup>2</sup> The PCR rate applies only to SCFHP's CMC line of business and includes members 18 years of age and older.



### ADHD Medi-Cal Behavioral Health Metrics

Source: HEDIS data for 2020 and YTD 2021 measurement period (Run Date: 12/19/2021)

Measure	NCQA Medicaid 50 <sup>th</sup> Percentile	2020 Rate	2020 SCFHP Percentile Rank	2021 Rate	2021 SCFHP Percentile Rank
Follow-Up Care for Children Prescribed ADHD Medication					
Initiation Phase	44.91%	45.26%	50 <sup>th</sup>	39.67%	25 <sup>th</sup>
Continuation & Maintenance Phase	55.96%	49.28%	25 <sup>th</sup>	46.58%	25 <sup>th</sup>
Antidepressant Medication Management					
Acute Phase Treatment	56.66%	64.15%	75 <sup>th</sup>	70.17%	90 <sup>th</sup>
Continuation Phase Treatment	40.28%	50.40%	90 <sup>th</sup>	54.45%	90 <sup>th</sup>
Cardiovascular Monitoring for People with Cardiovascular Disease & Schizophrenia	73.43%	71.43%	10 <sup>th</sup>	66.67%	10 <sup>th</sup>



Dashboard Metrics Turn-Around Time - Q4 2021



Cal MediConnect	Oct	Nov	Dec	Q4 2021
CONCURRENT ORGANIZATION DETERMINATIONS				
# of Concurrent Requests Received	172	158	195	525
# of Concurrent Review of Authorization Requests (part C)				
completed within five (5) working of request	172	158	195	525
% of Concurrent Review of Authorization Requests (part C)				
completed within five (5) working of request	100.0%	100.0%	100.0%	100.0%
PRE-SERVICE ORGANIZATION DETERMINATIONS				
Standard Part C				
# of Standard Pre-Service Prior Authorization Requests Received	723	747	760	2,230
# of Standard Pre-Service Prior Authorization Requests (part C)				
completed within fourteen (14) calendar days	719	740	758	2,217
% of Standard Pre-Service Prior Authorization Requests (part C)				
completed within fourteen (14) calendar days	<b>99.4%</b>	<b>99.1%</b>	<b>99.7%</b>	<b>99.4%</b>
Expedited Part C				
# of Expedited Pre-Service Prior Authorization Requests Received	266	238	286	790
# of Expedited Pre-Service Prior Authorization Requests				
(part C) completed within sevety-two (72) hours	262	235	284	781
% of Expedited Pre-Service Prior Authorization Requests				
(part C) completed within seventy-two (72) hours	<b>98.5%</b>	<b>98.7%</b>	<b>99.3%</b>	98.9%
POST SERVICE ORGANIZATION DETERMINATIONS				
# of Retrospective Requests Received	61	57	59	177
# of Retrospective Requests (part C) completed within thirty (30)				
calendar days	60	57	59	176
% of Retrospective Requests (part C) completed within thirty (30)				
calendar days	<mark>98.4%</mark>	100.0%	100.0%	99.4%
PART B DRUGS ORGANIZATION DETERMINATIONS				
# of Standard Prior Authorization Requests (part B drugs) Requests				
Received	20	15	28	63
# of Standard Prior Authorization Requests (part B drugs) completed				
within sevety-two (72) hours of request	19	15	28	62
% of Standard Prior Authorization Requests (part B drugs) completed				
within seventy-two (72) hours of request	95.0%	100.0%	100.0%	98.4%
# of Expedited Prior Authorization (part B drugs) Requests Received	17	19	14	50
# of Expedited Prior Authorization requests (part B drugs) completed				
within twenty-four (24) hours of request	16	17	13	46
% of Expedited Prior Authorization requests (part B drugs)				
completed within twenty-four (24) hours of request	94.1%	89.5%	<b>92.9%</b>	92.0%



#### **MEDICAL AUTHORIZATIONS - HS COMBINED**

Concurrent Review	Oct	Nov	Dec	Q4 2021
Total # of Concurrent Requests Resolved	190	202	260	652
# of Concurrent Review of Authorization Requests completed within				
five (5) working days of request	190	201	260	651
% of Concurrent Review of Authorization Requests completed within				
five (5) working days of request	100.0%	99.5%	100.0%	99.8%
Routine Authorizations				
Total # of Routine Prior Authorization Requests Resolved	1,148	1,166	1,139	3,453
# of Routine Prior Authorization Requests completed within five (5)				
working days of request	1,145	1,160	1,127	3 <i>,</i> 432
% of Routine Prior Authorization Requests completed within five (5)				
working days of request	99.7%	99.5%	98.9%	99.4%
Expedited Authorizations				
Total # of Expedited Prior Authorization Requests Resolved	165	150	162	477
# of Expedited Prior Authorization Requests completed within seventy-				
two (72) hours of request	165	149	162	476
% of Expedited Prior Authorization Requests completed within seventy-				
two (72) hours of request	100.0%	<mark>99.3%</mark>	100.0%	99.8%
Retrospective Review				
Total # of Retrospective Requests Resolved	313	260	299	872
# of Retrospective Requests completed within thirty (30) calendar				
days of request	312	260	298	870
% of Retrospective Requests completed within thirty (30) calendar				
days of request	<mark>99.7%</mark>	100.0%	99.7%	99.8%
Member Notification of UM Decision				
Total # of UM decisions	1,640	1,601	1,611	4,852
# Member Notification of UM decision in writing within two (2)				
working days of the decision.	1,628	1,586	1,605	4,819
% Member Notification of UM decision in writing within two (2)				
working days of the decision.	99.3%	99.1%	99.6%	99.3%
Provider Notification of UM Decision				
# Provider Notification of UM decision by telephone, facsimile or				
electronic mail and then in writing within twenty-four (24) hours of				
making the decision	1,605	1,569	1,591	4,765
electronic mail and then in writing within twenty-four (24) hours of				
making the decision	97.9%	<mark>98.0%</mark>	98.8%	98.2%



Quarterly Referral Tracking Q4 2021



#### Cal MediConnect Q4 2021 Referral Tracking Report

LOBRollupN	Template	Disposition	Total # of Auths	# Auth Services Rendered within 90 days	# Auth Services Rendered After 90 days	# Auth Services Not Rendered	% Auths w/ No Services Rendered
Cal	CBAS	Retro Request	10	within 90 days	90 days	3	30.0%
MediConnect	00/10	Routine - Extended Service	3	2	0	1	33.3%
	CONT OF CARE	Member Initiated Org Determi.	3	0	0	3	100.0%
		Non Contracted Provider - Urg.		1	0	0	0.0%
		Overturned Denial		0	0	1	100.0%
	CUSTODIAL	Retro Request	99	91	0	8	8.1%
		Routine - Initial Request	49	29	0	20	40.8%
	DME	Member Initiated Org Determi.		1	0	19	95.0%
	22	Member Initiated Org Determi		4	0	7	63.6%
		Non Contracted Provider - Ret.		1	0	0	0.0%
		Non Contracted Provider - Ro	31	7	0	24	77.4%
		Non Contracted Provider - Urg.		0	0	3	100.0%
		Operational PA	2	1	0	1	50.0%
		Overturned Denial	3	1	0	2	66.7%
		PDR/Claims Medical Review	1	1	0	0	0.0%
		Retro Request	11	9	0	2	18.2%
		Routine - Initial Request	208	102	0	106	51.0%
		Urgent - Initial Request	9	4	0	5	55.6%
	HomeHealth	Member Initiated Org Determi		4	0	4	100.0%
	riomenealur	Member Initiated Org Determi.	4	0	0	4	100.0%
		Member Rep Initiated Org Det.		1	0	0	0.0%
				0	0	1	100.0%
		Modified original request – Se					100.0%
		Non Contracted Provider - Ro		0	0	1	
		Non Contracted Provider - Urg.	. 5	18	0	43	100.0% 70.5%
		Operational PA					
		Overturned Denial PDR/Claims Medical Review	1	0	0	1	100.0% 0.0%
					0		
		Retro Request	13	6	0	7	53.8%
		Routine - Extended Service	25	11	0	14	56.0%
		Routine - Initial Request	26	12	0	14	53.8%
		Urgent - Extended Service	141	52	0	89	63.1%
		Urgent - Initial Request	230	68	0	162	70.4%
	HOSPICE	Non Contracted Provider - Ret.		2	0	2	50.0%
		Non Contracted Provider - Ro		0	0	1	100.0%
		Non Contracted Provider - Urg.		0	0	1	100.0%
		Retro Request	1	1	0	0	0.0%
		Routine - Initial Request	1	0	0	1	100.0%
	Inpatient		1	1	0	0	0.0%
		Non Contracted Provider - Ret.		1	0	0	0.0%
		Non Contracted Provider - Ro		12	0	1	7.7%
		Operational PA	6	5	0	1	16.7%
		PDR/Claims Medical Review	17	15	0	2	11.8%
		Routine - Extended Service	1	1	0	0	0.0%
		Routine - Initial Request	553	527	0	26	4.7%
	InpatientAdmin	Routine - Initial Request	1	0	0	1	100.0%
	InpatientPsych	Routine - Initial Request	3	2	0	1	33.3%
	Inpt Elective	Member Initiated Org Determi		0	0	1	100.0%
		Overturned Denial	1	0	0	1	100.0%
		Routine - Initial Request	44	22	0	22	50.0%

#### Referral Tracking Report

LOBRollupN	Template	Disposition	Total # of Auths	# Auth Services Rendered within 90 days	# Auth Services Rendered After 90 days	# Auth Services Not Rendered	% Auths w/ No Services Rendered
Cal	Inpt Elective	Urgent - Initial Request	27	14	0	13	48.1%
MediConnect	OP-BehavioralGr	Non Contracted Provider - Ro	1	0	0	1	100.0%
	OP-Behavorial	Non Contracted Provider - Ro	5	1	0	4	80.0%
		Routine - Initial Request	1	1	0	0	0.0%
	OPHospital	CMC Part B Drugs – Routine	27	4	0	23	85.2%
		CMC Part B Drugs – Urgent	36	9	0	27	75.0%
		Member Initiated Org Determi	27	3	0	24	88.9%
		Member Initiated Org Determi	15	1	0	14	93.3%
		Member Rep Initiated Org Det.	. 1	0	0	1	100.0%
		Non Contracted Provider - Ret.	. 3	0	0	3	100.0%
		Non Contracted Provider - Ro	50	5	0	45	90.0%
		Non Contracted Provider - Urg.	. 5	2	0	3	60.0%
		Operational PA	1	0	0	1	100.0%
		Overturned Denial	21	7	0	14	66.7%
		PDR/Claims Medical Review	24	15	0	9	37.5%
		Retro Request	26	14	0	12	46.2%
		Routine - Extended Service	21	8	0	13	61.9%
		Routine - Initial Request	777	128	0	649	83.5%
		Urgent - Extended Service	2	2	0	0	0.0%
		Urgent - Initial Request	235	75	0	160	68.1%
	OPHospitalGr	CMC Part B Drugs – Routine	36	8	0	28	77.8%
		CMC Part B Drugs – Urgent	16	9	0	7	43.8%
		Member Initiated Org Determi	11	6	0	5	45.5%
		Member Initiated Org Determi	17	9	0	8	47.1%
		Member Rep Initiated Org Det.	2	1	0	1	50.0%
		Member Rep Initiated Org Det.	2	0	0	2	100.0%
		Modified original request – Se	1	0	0	1	100.0%
		Non Contracted Provider - Ro	14	2	0	12	85.7%
		Non Contracted Provider - Urg.	. 1	0	0	1	100.0%
		Non-contracted CMC Part B D.	. 1	0	0	1	100.0%
		Non-contracted CMC Part B D.	. 1	0	0	1	100.0%
		Operational PA	2	1	0	1	50.0%
		Overturned Denial	7	0	0	7	100.0%
		PDR/Claims Medical Review	27	21	0	6	22.2%
		Retro Request	3	0	0	3	100.0%
		Routine - Extended Service	27	11	0	16	59.3%
		Routine - Initial Request	288	102	0	186	64.6%
		Urgent - Initial Request	63	31	0	32	50.8%
	SkilledNursing	Operational PA	62	41	0	21	33.9%
		PDR/Claims Medical Review	3	3	0	0	0.0%
		Retro Request	11	8	0	3	27.3%
		Routine - Initial Request	31	23	0	8	25.8%
		Urgent - Initial Request	88	67	0	21	23.9%
	Transportation	Member Initiated Org Determi	13	0	0	13	100.0%
		Member Initiated Org Determi	7	0	0	7	100.0%
		Member Rep Initiated Org Det.	. 1	0	0	1	100.0%
		Member Rep Initiated Org Det.	. 1	0	0	1	100.0%
		Overturned Denial	1	0	0	1	100.0%
		PDR/Claims Medical Review	2	1	0	1	50.0%

#### **Referral Tracking Report**

LOBRollupN	Template	Disposition	Total # of Auths		# Auth Services Rendered After 90 days	# Auth Services Not Rendered	% Auths w/ No Services Rendered
MediConnect	Transportation	Routine - Initial Request	76	3	0	73	96.1%
Grand Total			3,748	1,656	0	2,092	55.8%



#### Medi-Cal Q4 2021 Referral Tracking Report

LOBRollupN	Template	Disposition	Total # of Auths	# Auth Services Rendered within 90 days	# Auth Services Rendered After 90 days	# Auth Services Not Rendered	% Auths w/ N Service Rendere
Medi-Cal	CBAS	Retro Request	78	65	0	13	16.79
		Routine - Extended Service	35	30	0	5	14.39
		Routine - Initial Request	3	3	0	0	0.09
	CONT OF CARE	Non Contracted Provider - Ro	2	2	0	0	0.0
		Non Contracted Provider - Urg.	. 1	0	0	1	100.09
		Routine - Initial Request	1	0	0	1	100.09
	CONT OF CARE GR	Non Contracted Provider - Urg.	. 1	0	0	1	100.09
		Routine - Initial Request	1	0	0	1	100.09
		Urgent - Initial Request	1	1	0	0	0.09
	CUSTODIAL	Non Contracted Provider - Ro	1	1	0	0	0.0
		Retro Request	503	468	0	35	7.09
		Routine - Initial Request	284	182	0	102	35.99
	CUSTODIAL COVID	Operational PA	1	1	0	0	0.0
	Dental	Non Contracted Provider - Ro	1	0	0	1	100.09
	Dental	Overturned Denial	1	0	0	1	100.0
		Routine - Initial Request	35	9	0	26	74.3
		•			0	20	87.5
	DME	Urgent - Initial Request	8	1			
	DME	Non Contracted Provider - Ret.		0	0	5	100.0
		Non Contracted Provider - Ro	28	7	0	21	75.0
		Non Contracted Provider - Urg.		0	0	7	100.0
		Operational PA	1	0	0	1	100.0
		Overturned Denial	1	0	0	1	100.0
		PDR/Claims Medical Review	13	11	0	2	15.4
		Retro Request	61	22	0	39	63.9
		Routine - Extended Service	1	0	0	1	100.0
		Routine - Initial Request	338	124	0	214	63.3
		Urgent - Initial Request	49	26	0	23	46.9
	HomeHealth	Non Contracted Provider - Ret	. 1	1	0	0	0.0
		Non Contracted Provider - Urg.	. 4	0	0	4	100.0
		Operational PA	20	5	0	15	75.0
		Overturned Denial	1	0	0	1	100.0
		PDR/Claims Medical Review	1	0	0	1	100.0
		Retro Request	2	0	0	2	100.0
		Routine - Extended Service	8	2	0	6	75.0
		Routine - Initial Request	4	1	0	3	75.0
		Urgent - Extended Service	13	4	0	9	69.2
		Urgent - Initial Request	22	7	0	15	68.2
	HOSPICE	Non Contracted Provider - Ret.	. 21	17	0	4	19.0
		Non Contracted Provider - Ro		1	0	0	0.0
		Non Contracted Provider - Urg.	. 2	0	0	2	100.0
		Retro Request	9	4	0	5	55.6
		Routine - Initial Request	- 1	0	0	1	100.0
	Inpatient		1	1	0	0	0.0
		Non Contracted Provider - Ret		3	0	0	0.0
		Non Contracted Provider - Re	. 30	18	0	12	40.0
							40.0
		Operational PA	1	1	0	0	
		PDR/Claims Medical Review	63	36	0	27	42.9
		Retro Request	3	2	0	1	33.3
		Routine - Extended Service	3	2	0	1	33.3
		Routine - Initial Request	741	581	0	160	21.

#### Referral Tracking Report

LOBRollupN	Template	Disposition	Total # of Auths	# Auth Services Rendered within 90 days	# Auth Services Rendered After 90 days		% Auths w/ No Services Rendered
Medi-Cal	InpatientAdmin	Operational PA	1	1	0	0	0.0%
		Routine - Initial Request	2	0	0	2	100.0%
	Inpt Elective	Non Contracted Provider - Urg.	. 1	0	0	1	100.0%
		Overturned Denial	2	1	0	1	50.0%
		Routine - Initial Request	66	39	0	27	40.9%
		Urgent - Initial Request	17	6	0	11	64.7%
	OP-BehavioralGr	Non Contracted Provider - Ro	11	8	0	3	27.3%
		Retro Request	22	12	0	10	45.5%
		Routine - Extended Service	72	45	0	27	37.5%
		Routine - Initial Request	5	4	0	1	20.0%
	OP-Behavorial	Non Contracted Provider - Ro	39	1	0	38	97.4%
		Non Contracted Provider - Urg.	. 1	1	0	0	0.0%
		Overturned Denial	2	0	0	2	100.0%
		Retro Request	8	2	0	6	75.0%
		Routine - Extended Service	26	10	0	16	61.5%
		Routine - Initial Request	37	5	0	32	86.5%
		Urgent - Initial Request	1	0	0	1	100.0%
		Urgent - RN review; Expedite	1	0	0	1	100.0%
	OPHospital	Non Contracted Provider - Ret.	17	6	0	11	64.7%
		Non Contracted Provider - Ro	59	5	0	54	91.5%
		Non Contracted Provider - Urg.	. 21	1	0	20	95.2%
		Overturned Denial	11	1	0	10	90.9%
		PDR/Claims Medical Review	92	28	0	64	69.6%
		Retro Request	42	21	0	21	50.0%
		Routine - Extended Service	40	11	0	29	72.5%
		Routine - Initial Request	662	186	0	476	71.9%
		Urgent - Initial Request	198	68	0	130	65.7%
		Urgent – RN review; Expedite	1	0	0	1	100.0%
	OPHospitalGr	Non Contracted Provider - Ret.		0	0	1	100.0%
		Non Contracted Provider - Ro	16	7	0	9	56.3%
		Non Contracted Provider - Urg.		0	0	2	100.0%
		Operational PA	1	0	0	- 1	100.0%
		Overturned Denial	4	2	0	2	50.0%
		PDR/Claims Medical Review	38	29	0	9	23.7%
		Retro Request	20	12	0	8	40.0%
		Routine - Extended Service	105	48	0		54.3%
		Routine - Initial Request	528	161	0	367	69.5%
		Urgent - Extended Service	3	3	0	0	0.0%
		Urgent - Initial Request	112	58	0		48.2%
	SkilledNursing	Non Contracted Provider - Urg.		0	0		100.0%
	Onlinear an Sing	Operational PA	26	11	0		57.7%
		Overturned Denial	20	1	0	1	50.0%
		PDR/Claims Medical Review	2	2	0	0	0.0%
		Retro Request	2	2	0	0	0.0%
		Routine - Initial Request	16	11	0	5	31.3%
		Urgent - Initial Request	52	36	0		31.3%
	Transportation	Non Contracted Provider - Ret.			0	76	86.4%
	Transportation			12			
		Non Contracted Provider - Ro	4	0	0		100.0%
		Operational PA	1	0	0	1	100.0%
		PDR/Claims Medical Review	107	101	0	6	5.6%

#### Referral Tracking Report

LOBRollupN	Template	Disposition	Total # of Auths	# Auth Services Rendered within 90 days	# Auth Services Rendered After 90 days	# Auth Services Not Rendered	% Auths w/ No Services Rendered
Medi-Cal Transportation		Retro Request	12	7	0	5	41.7%
		Routine - Initial Request	350	116	0	234	66.9%
Grand Total			5,366	2,720	0	2,646	49.3%



Quality Monitoring of Plan Authorizations and Denial Letters Q4 2021



#### Quality Monitoring of Denial Letters for HS.04.01 4th Quarter 2021

#### I. Purpose of the Quality Assurance (QA)

In order to present the results to Utilization Management Committee (UMC), Santa Clara Family Health Plan (SCFHP) completed the quarterly review for timely, consistent, accurate and understandable notification to members and providers regarding adverse determinations.

#### II. Procedure

Santa Clara Family Health Plan reviewed in accordance to this procedure, 30 authorizations for the 4th quarter of 2021 in order to assess for the following elements.

- A. Quality Monitoring
  - 1. The UM Manager and Medical Director are responsible for facilitating a random review of denial letters to assess the integrity of member and provider notification.
    - a. At least 30 denial letters per quarter
    - b. Is overseen by the Utilization Management Committee on a quarterly basis
    - c. Assessment of denial notices includes the following:
      - Turn-around time for decision making
      - Turn-around time for member notification
      - Turn-around time for provider notification
      - Assessment of the reason for the denial, in clear and concise language
      - Includes criteria or Evidence of Benefit (EOB) applied to make the denial decision and instructions on how to request a copy of this from UM department.
      - Type of denial: medical or administrative
      - Addresses the clinical reasons for the denial
      - Specific to the Cal Medi-Connect membership, the denial notification includes what conditions would need to exist to have the request be approved.
      - Appeal and Grievance rights
      - Member's letter is written in member's preferred language within plan's language threshold.
      - Member's letter includes interpretation services availability
      - Member's letter includes nondiscriminatory notice.
      - Provider notification includes the name and direct phone number of the appropriately licensed professional making the denial decision



#### III. Findings

- A. For Q4 2021, the dates of service and denials were pulled in January 2022.
  - 1. 30 unique authorizations were pulled with a random sampling.
    - a. 50% or 15/30 Medi-Cal LOB and 50% or 15/30 CMC LOB
    - b. 100% or 30/30 were denials
    - c. 50% or 15/30 were expedited requests
      - 100% of the expedited authorizations are compliant with regulatory turnaround time of 72 calendar hours
    - d. 50% or 15/30 were standard requests
      - 100% of the expedited authorizations are compliant with regulatory turnaround time (5 business days for Medi-Cal LOB and 14 calendar days for CMC LOB)
    - e. 47% or 14/30 were medical denials
    - f. 53% or 16/30 were administrative denials
    - g. 100% were denied by a Medical Director
    - h. 100% or 30/30 of all requests were provided written notifications to both member and provider
    - i. 100% or 15/15 of the expedited authorizations were provided oral notifications to member.
    - j. 100% or 30/30 of the member letters are in the member's preferred language.
    - k. 100% or 30/30 of the written notifications were readable
    - I. 100% or 30/30 of the written notifications included the rationale for denial
    - m. 100% or 30/30 of the letters included the criteria or EOC that the decision was based upon.
    - n. 100% or 30/30 of the letters included interpreter rights and instructions on how to contact the Medical Director.

#### IV. Follow-Up

The Utilization Management leadership team and Medical Director reviewed the findings of this audit and recommendations from that finding presented to UMC are as follows:

- 1. Quality and productivity will continue to be monitored on a regular basis including these quarterly audits. Findings were reviewed by the Medical Director.
- 2. Issues will be addressed with the appropriate staff member as indicated.



### Delegation Oversight Dashboard



	Delegation Oversignt - Passing Percentage												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
VHP	N/A	N/A	50%	70%	60%	80%	90%	50%	60%	50%	60%	80%	2021
PMG	N/A	N/A	N/A	90%	80%	90%	100%	80%	80%	90%	Pending documentation	Pending documentation	2021
PCNC	N/A	N/A	N/A	60%	40%	40%	30%	40%	50%	40%	40%	Pending documentation	2021
NEMS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0%	80%	2021

NEMS- just started in October 2021

PMG- delay in sending samples until Febuary due to under-going DHCS audits at this time PCNC- will also delay in sending samples



### Annual Physician Peer-to-Peer - 2021



#### Peer to Peer Annual Review Calendar Year Year to Date January 1 to December 31, 2021

In accordance with Procedure HS.02.02, the provider dispute process also includes a Peer to Peer (P2P) review with the SCFHP physician who makes the determination (in cases of denials of service). It is the goal of SCFHP medical director team to ensure quality of service and return of calls when there is a requested P2P. This analysis evaluates the completion rate and final determinations for those calls.

All cases were reviewed for compliance. This was to ensure that the Peer to Peer process is working and that community physician requests for P2P are completed and do in fact occur. Many initial requests were made, however, a subset of providers were either: 1. Called for approved auths (no P2P needed), 2. Unable to be reached or scheduled after 3 attempts, 3. Withdrew the request after call back, 4. Offices were calling for delegated denials, or 4. Original practitioner was not making the request. As such, the total P2P requests were: 73 which is 44% higher than the 2020 requests (41 in 2020).

The findings are as follows:

73 Peer to Peer Requests were scheduled.

- 1. 92% (67/73) calls were completed with the SCFHP Medical Director and the requesting Practitioner.
- 2. 100% (67/67 cases) had documentation of the call in our QNXT system.
- 3. In terms of upheld or overturning of auth after P2P:
  - 46/67 (69%) requests were overturned after the P2P
  - 21/67 (31%) requests were upheld after P2P
  - 6 cases were not completed

SCFHP recommendation to UMC:

- 1. Since 6/2017, QNXT is the one system that now holds authorizations for all Lines of Business (Medi-Cal and Cal MediConnect). The current findings are that 100% of the completed P2Ps were documented in the QNXT system.
- 2. 91% of requests were returned by SCFHP Medical Director. Which is slightly lower than prior evaluations, however, given COVID disruptions in 2021 and increased call volume is not unexpected. This will be monitored and CAP issued if needed.





DEVELOT MENTAL AND TRAOMA SORVEENING 3000 2000 2000 1500 0 0 CY21 Q1 CY21 Q2 CY21 Q3 CY21 Q4 CY21 Q4 CY21 Q4 CY21 Q4 CY21 Q4 CY21 Q4

DEVELOPMENTAL AND TRAUMA SCREENING



### **Developmental Screenings by Network**

Network	2021 Total
SCFHP Direct	274
Valley Health Plan	5638
Palo Alto Medical Foundation	145
Physicians Medical Group	3274
Premier Care	1898
North East Medical Services	19 (one provider)



Utilization: Behavioral Health\*\* Cal MediConnect per 1,000



Run Date 1/10/2022

\*\* Utilization may include both specialty and mild to moderate Category of Service: Visit, Unique member, Service NPI, Date of service



### Utilization: Cal MediConnect Unique Members



Run Date 1/10/2022 Category of Service: Visit, Unique member, Service NPI, Date of service Outpatient Mental Health = All ages







MC: Outpatient Mild to Moderate Unique Members





## **Behavioral Health Treatment**



Run date 1/10/2022 BHT = Units = hours Member = <21 years



### **Behavioral Health Treatment**



Run date = 1/10/2022



### Utilization Follow up

- Behavioral Health Treatment
  - Cost of treatment
  - Length of treatment
  - Supplemental treatments: OT and Speech
  - Treatment by diagnosis (ASD vs. other)
- Lower than expected utilization of mental health for both CMC and MC



Adjournment Next Meeting: April 20, 2022