

Memorandum

To: Gold Coast Health Plan Providers

From: Vicki Wrighster, Senior Director Network Operations

Re: **Payment Integrity Process Implementation**

Date: Sept. 16, 2026

As part of our commitment to maintaining accurate claims payment practices and ensuring responsible stewardship of healthcare resources, Gold Coast Health Plan (GCHP) is updating its Payment Integrity Program, effective Oct. 14, 2026. We are providing this communication to outline important processes regarding coding-related overpayment reviews, coordination of benefits (COB) recoveries, and upcoming clinical audit activities.

1. Coding-Related Overpayment Reviews

GCHP periodically conducts payment integrity reviews to identify claims that may have been paid incorrectly due to coding discrepancies or billing inaccuracies. These reviews are not related to medical necessity determinations, but rather focus on areas such as:

- Coding errors
- Modifier usage
- Duplicate billing
- Billing inconsistencies
- Claims submitted contrary to coding guidelines
- Other payment accuracy issues

When an overpayment is identified, a written notification will be sent to the provider explaining:

- The claim(s) involved
- The reason for the overpayment determination
- The amount identified for recovery
- Instructions for submitting a refund or dispute

Providers will have **30 working days** from the date of the notification to:

1. Submit a refund for the identified overpayment by check; or
2. Submit supporting documentation and a written dispute for review.

If a refund or dispute is not received within 30 days, GCHP may recover the overpayment through an offset against future payments in accordance with applicable contractual and regulatory requirements.

2. Coordination of Benefits (COB) Overpayment Recoveries

GCHP also conducts reviews to ensure claims are processed accurately when multiple insurance coverages exist.

When a COB-related overpayment is identified, providers will receive a notification that includes:

- The name of the primary carrier
- The other carrier's policy identification number
- Applicable coverage dates
- The impacted claim(s)
- The overpayment amount
- Instructions for submitting a refund or a dispute

Providers will have **30 working days** from receipt of the notification to submit any dispute or supporting documentation.

If no dispute is received within **30 days**, GCHP may proceed with recovery through an offset against future payments.

We encourage providers to review these notices promptly and submit any supporting information that may affect the recovery determination.

3. New Payment Integrity Vendor Effective Jan. 2027

Beginning **Jan. 1, 2027**, GCHP will partner with **Clarix Health** to perform certain clinical payment integrity audits.

The vendor will conduct reviews that may include:

- Diagnosis related group (DRG) audits
- Readmission reviews
- Itemized billing reviews (IBR)
- Other clinically focused payment integrity audits

These audit activities may require providers to submit medical records and supporting documentation for review. Requests for records will be issued directly by **Claris Health** and will include instructions regarding submission requirements and response timelines. If requested records are not submitted, GCHP will deny the claim or recover payment until the records are received.

DRG Audit Program

The DRG review program will include both:

- **Pre-payment audits**, conducted prior to final claim payment; and
- **Post-payment audits**, conducted after claim adjudication and payment.

First level clinical audits will be managed by **Claris Health**. Second level clinical audits will be managed by the GCHP Health Services team.

GCHP values its partnership with providers and remains committed to maintaining a transparent, collaborative payment integrity process. We encourage providers to review all notices promptly and respond within the required timeframes to avoid unnecessary offsets or delays.

For questions regarding the overpayment notice or request for medical records from Claris Health, please refer to the instructions in the overpayment notice or medical records request for additional information.

Thank you for your continued partnership and service to our GCHP members. If you have questions regarding this update, please contact us at ProviderRelations@goldchp.org.