

Oregon Health Authority

2020 Mental Health Parity Analysis Report

for

AllCare CCO, Inc.

February 2021



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Overview of Oregon's Mental Health Parity Analysis

Mental Health Parity (MHP) regulations are intended to ensure that coverage and access to services for the treatment of mental health (MH) and substance use disorder (SUD) conditions are provided in parity with treatments provided for medical and surgical (M/S) needs. The required analysis of MH benefits is governed by federal regulations. The Mental Health Parity and Addiction Equity Act of 2008 (MHPAEA) governs how MH/SUD treatments delivered by managed care organizations and limitations on MH/SUD benefits are comparable to and applied no more stringently than the limitations applied to M/S benefits. Provisions of the MHPAEA became applicable to the Oregon Health Plan (OHP) in October 2017 when the Medicaid Parity Final Rule (42 Code of Federal Regulations [CFR] §438 Subpart K) went into effect. The rule requires parity in key areas:

- Aggregate lifetime and annual dollar limits (AL/ADLs).
- Financial requirements (FRs—such as copays).
- Quantitative treatment limitations (QTLs—such as day and visit limits).
- Non-quantitative treatment limitations (NQTLs—such as prior authorization [PA] and provider network admission requirements).

Additional MHP regulations require that criteria for medical necessity determinations for MH/SUD benefits must be made available to beneficiaries and providers upon request, as well as the reason for denial of reimbursement or payment for MH/SUD benefits. States must also implement monitoring procedures to ensure continued compliance and to identify when changes in benefit design or operations could affect compliance and require an updated analysis.

To meet the requirements, the Oregon Health Authority (OHA) conducted an initial MHP Analysis of OHP's full delivery system in 2018. OHA's 15 coordinated care organizations (CCOs) and Oregon Health Plan Fee-for-Service (OHP FFS) participated in the initial MHP Analysis, which included an inventory of all MH/SUD and M/S benefits offered to OHP members and the limitations applied to those benefits to ensure that limitations (e.g., day limits, PA requirements, or network admission standards) for MH and SUD services were comparable to and applied no more stringently than those for M/S services provided under OHP. Results of the initial analysis were reported in August 2018; and in 2019, the CCOs implemented corrective actions in areas lacking parity.

For 2020, OHA tasked Health Services Advisory Group, Inc. (HSAG), with conducting a follow-up MHP Analysis across the CCOs, in part due to each of the CCOs entering into new five-year contracts with the State, to determine if the existing benefits and any NQTLs remained compliant with the MHP regulations in 42 CFR §438 Subpart K. HSAG conducted the MHP Analysis in 2020 based on the August 2018 results, any implemented corrective actions, and any additional changes to benefits design or operations that may impact parity. This report provides information on and results of the 2020 MHP Analysis for AllCare CCO, Inc. (AllCare).

Components of the 2020 MHP Analysis

In accordance with 42 CFR §438 Subpart K, MHP applied to all OHP benefits delivered through OHA’s managed care delivery system, including those delivered through a combination of managed care and FFS delivery systems. HSAG developed a protocol and tools to carry out the analysis activity based on the initial 2018 MHP Analysis and in alignment with guidance outlined in the toolkit provided by the Centers for Medicare & Medicaid Services (CMS): *Parity Compliance Toolkit Applying Mental Health and Substance Use Disorder Parity Requirements to Medicaid and Children’s Health Insurance Programs*.¹⁻¹ The 2020 MHP Analysis also referenced [Oregon’s Mapping Guide](#)¹⁻² that assigned benefits to MH/SUD and M/S groupings based on International Classification of Diseases, Tenth Revision (ICD-10) diagnoses and mapped into four prescribed classifications as published in the March 30, 2016, Federal Register, Vol. 81, No. 61¹⁻³ as illustrated in Figure 1-1.

Figure 1-1—MHP: Four Prescribed Classifications



OHP Benefit Packages

While all OHP benefit packages were delivered in accordance with the same Medicaid essential health benefits structure, the delivery of those benefits was categorized by OHP benefit package based on enrollment. Table 1-1 identifies the four OHP benefit packages evaluated in the 2020 MHP Analysis. Since each benefit package involves the delivery of Medicaid essential health benefits covered by both CCOs and OHP FFS, HSAG conducted an analysis of each CCO’s NQTLs, and then against the OHP FFS NQTLs.

Table 1-1—OHP Benefit Packages

Benefit Package	Benefit Types Covered	Evaluation
CCOA	Physical Health, Behavioral Health, Dental Health	CCO MH/SUD and FFS MH/SUD compared to CCO M/S
CCOB	Physical Health, Behavioral Health	
CCOE	Behavioral Health	CCO MH/SUD and FFS MH/SUD compared to FFS M/S
CCOG	Behavioral Health, Dental Health	

¹⁻¹ The CMS *Parity Compliance Toolkit Applying Mental Health and Substance Use Disorder Parity Requirements to Medicaid and Children’s Health Insurance Programs* and additional CMS resources related to MHP can be accessed at: <https://www.medicaid.gov/medicaid/benefits/behavioral-health-services/parity/index.html>.

¹⁻² The Oregon Mapping Guide includes definitions, links, and resources important for the MHP Analysis. It also maps all Oregon Medicaid benefits to the classifications required for the MHP Analysis. It can be accessed on OHA’s MHP webpage at: <https://www.oregon.gov/OHA/HSD/OHP/Pages/MH-Parity.aspx>.

¹⁻³ Federal Register. Volume 81, No. 61/Wednesday, March 30, 2016. Available at: <https://www.govinfo.gov/content/pkg/FR-2016-03-30/pdf/FR-2016-03-30.pdf>. Accessed on: Dec 4, 2020.

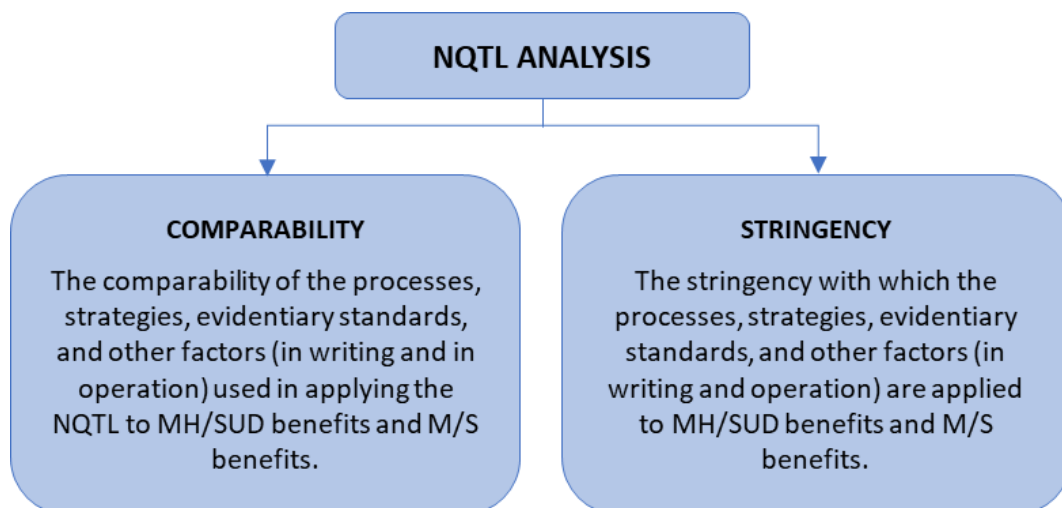
Non-Quantitative Treatment Limitations

Because Oregon Medicaid does not permit the use of QTLs (e.g., day and visit limits), HSAG’s analysis focused on assessing NQTLs in the OHP delivery system. NQTLs are health care management limitations on the scope or duration of benefits through the use of managed care processes, such as PA or network admission standards. “Soft limits,” benefit limits that allow for an individual to exceed limits or allow for limits to be “waived” based on medical necessity, are also considered NQTLs. Examples of NQTLs include:

- Medical management standards limiting or excluding benefits based on medical necessity or appropriateness criteria.
- Standards for provider admission to participate in a network and reimbursement rates.
- Restrictions based on geographic location, facility type, or provider specialty.
- Fail-first policies or step therapy protocols.
- Exclusions based on failure to complete a course of treatment prior to allowing authorization of a subsequent treatment.

MHP regulations hold that no NQTL can be applied to MH/SUD benefits and services that is not comparable to or is more stringent than those applied to M/S benefits and services in each benefit classification regarding processes, strategies, evidentiary standards, or other factors. HSAG assessed policies and procedures as written and operational processes for compliance with parity requirements by classification (e.g., inpatient [IP] and outpatient [OP]) of services. The 2018 MHP Analysis compared NQTLs for services that address MH/SUD diagnoses with services that address M/S diagnoses across the OHP benefit packages. Comparability was assessed as to the reason an NQTL was used, the evidence that supported its use, and the process for its implementation. The stringency criterion assessed the rigor with which the NQTLs were applied, the evidence for the level of stringency, and penalties and exceptions associated with limitations. Comparability and stringency are defined in Figure 1-2.

Figure 1-2—MHP Analysis Comparability and Stringency



NQTL Categories

Similar to the Initial 2018 MHP Analysis, HSAG assessed for comparability and stringency criteria across six specific NQTL categories in the OHP delivery system. The six categories are described below.

- **Category I—Utilization Management Limits Applied to Inpatient Services:** Utilization management (UM) processes implemented through PA, concurrent review (CR), and retrospective review (RR) that may also be used to ensure medical necessity for MH/SUD and M/S services.
- **Category II—Utilization Management Limits Applied to Outpatient Services:** UM processes applied to OP MH/SUD and M/S services through PA, CR, and RR to ensure medical necessity.
- **Category III—Prior Authorization for Prescription Drug Limits:** PA as a means of determining whether particular medications will be dispensed. PA of prescription drugs limits the availability of specific medications.
- **Category IV—Provider Admission—Closed Network:** Closed networks as they impose limits to providers seeking to join a panel of approved providers.
- **Category V—Provider Admission—Network Credentialing:** Network enrollment/credentialing requirements imposed, including provider admission requirements such as state licensing requirements and exclusions of specific provider types, that may result in limitations.
- **Category VI—Out-of-Network/Out-of-State Limits:** Out-of-network (OON) and out-of-state (OOS) limits that affect how members access OON and OOS providers and address how OHA and the CCOs ensure necessary access to providers not eligible to be reimbursed or not in a CCO's network.

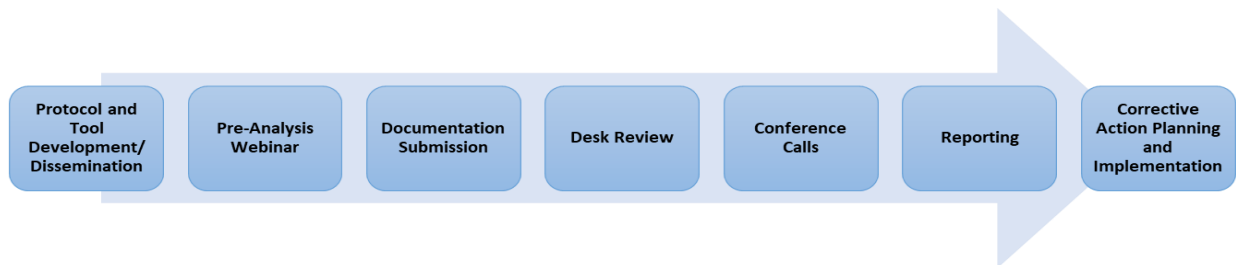
2. Process and Methodology

Building from the initial 2018 MHP Analysis, HSAG worked with OHA and the CCOs to conduct a follow-up MHP Analysis that evaluated changes to benefits design and operations that may impact parity. The 2020 MHP Analysis identified and addressed differences between the policies and standards governing limitations applied to MH/SUD services as compared to M/S services. Differences in how limits were applied to MH/SUD services as compared to M/S services were evaluated for continued compliance with MHP regulations to ensure evidence-based, quality MH/SUD care.

Analysis Activities for 2020

The 2020 MHP Analysis activities are illustrated in Figure 2-1 and described below.

Figure 2-1—2020 MHP Analysis Activities



1. **Protocol and Tool Development and Dissemination:** HSAG developed and disseminated an MHP Analysis Protocol that presented details and guidance to OHA and CCOs on the analysis process and included tools in which to conduct the 2020 MHP Analysis Activity. The tools utilized for the analysis, identified below, were based on OHA’s initial analysis of MHP and were developed using guidance outlined in the *CMS Parity Compliance Toolkit Applying Mental Health and Substance Use Disorder Parity Requirements to Medicaid and Children’s Health Insurance Programs*.
 - **MHP Evaluation Questionnaire**—Questions referencing the six NQTL categories, to identify changes that may impact parity.
 - **MHP Reporting Template**—Documentation of changes and additions to NQTLs previously reported in 2018, organized by the six NQTL categories.
 - **MHP Required Documentation Template**—UM and credentialing data across MH/SUD and M/S benefits and providers.
2. **Pre-Analysis Webinar:** HSAG conducted a pre-analysis webinar on July 15, 2020, with OHA and the CCOs to provide an overview of MHP regulations, details of the protocol and tools, specifics of the analysis timeline, and examples of MHP scenarios for reference.
3. **Documentation Submission:** OHA and the CCOs were required to submit documentation that included responses to the MHP Evaluation Questionnaire and completed templates, along with supporting documentation, by August 31, 2020.

4. **Desk Review:** HSAG conducted a desk review of all submitted MHP Evaluation Questionnaires, the MHP Reporting Template, and required and supporting documentation (e.g., policies and procedures, benefit schedules, and delegate agreements) to analyze policies and operational practices that impact MHP and determine preliminary analysis findings.
5. **Conference Calls:** HSAG conducted conference calls to discuss preliminary analysis findings and areas in need of clarification. Additional information and documentation were requested at that time, as necessary to support the MHP Analysis.
6. **Reporting:** HSAG compiled analysis results and documented MHP determinations for each CCO and as compared to OHP FFS, identifying areas in which MHP had not been achieved and corrective actions were required to ensure future parity. OHA and each CCO had an opportunity to review report drafts prior to finalizing the reports.
7. **Corrective Action Planning and Implementation:** HSAG will work with OHA and the CCOs to develop and implement corrective action plans to achieve compliance with MHP requirements.

MHP Analysis Methodology

HSAG reviewers conducted a desk review of submitted MHP Analysis tools and supporting documentation to further clarify reported changes and additions to previously reported NQTLs from the initial MHP Analysis conducted in 2018. More specifically, HSAG evaluated responses to the MHP Evaluation Questionnaire to identify changes to benefits design and operations within OHA and each CCO that may impact MHP, cross-referenced questionnaire responses with changes and additions reported in the MHP Reporting Template, and reviewed supporting documentation submitted by OHA and the CCOs. Supporting documentation included, but was not limited to, UM policies, workflow diagrams, program descriptions, prescription drug formularies, and network admission/credentialing policies. HSAG conducted the 2020 MHP Analysis based on this information to determine compliance with parity guidelines, including ensuring that policies followed standard industry practice, allowed for little to no exception or variation, incorporated established State definitions and guidelines, included staff members qualified to make the decisions and complete the tasks assigned and appropriate oversight.

Information obtained via scheduled conference calls was also evaluated in relation to changes and additions reported. Differences in how limits were applied to MH/SUD services as compared to M/S services, in relation to comparability and stringency standards displayed in Table 2-1, were evaluated across the six NQTL categories for continued compliance with MHP regulations. Each CCO's NQTLs were additionally evaluated against OHP FFS MH/SUD and M/S NQTLs based on the structure of OHP benefit packages referenced in Section 1 of this report.

Table 2-1—Comparability and Stringency Standards

Comparability and Stringency Standard	Question Description
Benefits in Which NQTLs Apply	<p>1. To which benefits is an NQTL assigned? <i>Purpose: To describe the NQTL assigned to MH/SUD and M/S benefits (e.g., PA, scope of services, and time frames).</i></p>
Comparability of Strategy	<p>2. Why is the NQTL assigned to these benefits? <i>Purpose: To describe for what reasons or purpose the NQTL is assigned (e.g., ensure medical necessity, prevent overutilization, and comply with State and federal requirements).</i></p>
Comparability of Evidentiary Standard	<p>3. What evidence supports the rationale for the assignment? <i>Purpose: To describe the evidence to support the rationale (e.g., benchmarks, standards that form the basis of the rationale, and State and federal requirements).</i></p>
Comparability of Processes	<p>4. What are the NQTL procedures? <i>Purpose: To describe the NQTL process and evidence needed to support NQTL determinations (e.g., documentation requirements, timelines, and steps for the CCO and members/providers).</i></p>
Stringency of Strategy	<p>5. How frequently or strictly is the NQTL applied? <i>Purpose: To describe the frequency of application, frequency of medical necessity and appropriateness reviews, level of discretion in how the NQTL is applied, triggers for review and re-review, etc.</i></p>
Stringency of Evidentiary Standard	<p>6. What standard supports the frequency or rigor with which the NQTL is applied? <i>Purpose: To describe standards that the CCO uses to determine the frequency or rigor of NQTL procedures.</i></p>

Analysis Results for 2020

Results of the analysis are incorporated in Section 3 of this report. The results identify overall compliance with MHP regulations across the six NQTL categories in relation to comparability and stringency. Limitations or other operational processes found to impact parity are reported as findings. Required actions are also presented to support future compliance with MHP requirements as applicable.

3. MHP Analysis Results

HSAG derived 2020 MHP Analysis results from the evaluation and observation of information obtained from AllCare. More specifically, the information and observations used for the evaluation included the following tools, documentation, and conversations:

- Responses to the 2020 MHP Evaluation Questionnaire.
- Reported data in the 2020 MHP Reporting Templates pertaining to NQTL categories.
- Information obtained from AllCare’s submitted 2020 MHP data using the Required Documentation Template and supporting documentation as provided.
- Observations from conversations during the conference call conducted with the CCO.

Results of the MHP Analysis are detailed below. Limitations or other operational processes found to impact parity are reported as findings, along with corresponding required actions. Appendices A and B include AllCare’s completed MHP questionnaire and finalized MHP reporting details by each NQTL category, respectively.

Overall Assessment

AllCare was responsible for delivering MH/SUD and M/S Medicaid benefits to members in all four benefit packages (CCOA, CCOB, CCOE, and CCOG), whereas OHP FFS was fully managing M/S benefits for CCOE and CCOG benefit packages. AllCare was providing MH/SUD benefits prescribed by OHA and had delegation agreements with community mental health programs (CMHPs) and other organizations (e.g., Northwest Rehab Alliance and PrimeCare) for the management of some of these benefits, including PA. The CCO did not delegate PA for SUD benefits. HSAG evaluated AllCare’s application of NQTLs to MH/SUD and M/S benefits in terms of comparability and stringency across the six NQTL categories.

Most of AllCare’s policies and documentation identified standardized processes that applied to both MH/SUD and M/S benefits, including a service authorization handbook, UM and service determination policies, and a PA timeliness guideline. The CCO did not have separate policies for the management of benefits based on benefit package (i.e., CCOA, CCOB, CCOE, and CCOG).

For limits applied to IP and OP health benefits, AllCare and its delegates used UM processes to manage MH/SUD and M/S benefits. The purpose of the CCO’s UM processes was to ensure coverage, medical necessity, appropriate treatment in the least restrictive environment that maintains the safety of the individual, compliance with federal and State requirements, and the prevention of unnecessary overutilization. AllCare reported that the evidence used to apply UM to MH/SUD and M/S included Oregon Administrative Rules (OARs), Health Evidence Review Commission (HERC) Prioritized List (PL) and guidelines, and Milliman Care Guidelines (MCG). The application of authorization limits and the frequency and rigor in which they were applied to authorization requests was comparable across

both MH/SUD and M/S benefits and to OHP FFS's application across both benefit types. However, for CCOE and CCOG benefit packages managed by both AllCare and OHP FFS, HSAG found that the CCO's 14-day time frame for submission of retrospective authorizations from the date of service was more stringent than OHP FFS's allowance of a RR time frame of 90 days for M/S benefits under the two benefit packages. Regarding interrater reliability (IRR), AllCare conducted regular reviews of MH/SUD and M/S authorizations using a 90 percent testing standard, which ensured a greater level of monitoring for consistency of authorization reviews than OHP FFS's annual M/S authorization reviews using an 80 percent testing standard. HSAG determined this discrepancy to be a quality issue for M/S benefit authorizations rather than a parity concern.

HSAG's analysis of AllCare processes and operations did not reveal any MHP concerns for the authorization of prescription drugs across the benefit packages. The application of PA for MH/SUD prescription drugs was comparable to PA for M/S prescription drugs. Prescription drug authorization requirements, guidelines, procedures, and 24-hour responses were determined to be no more stringently applied to MH/SUD benefit requests than to M/S requests.

Although AllCare's credentialing operations were comparable, HSAG's analysis of the CCO's reported data revealed high rates for provider applications not accepted with 46.67 percent of MH/SUD provider applications either closed or not accepted as compared to 30.09 percent of M/S provider applications. Considering the high rate of either closed or not accepted, primarily related to missing or incomplete information, the CCO should assess its credentialing operations for parity concerns and opportunities for improvement. While AllCare described its regular distribution of a quick reference guide and cover letter available to providers that identified the information needed for credentialing and recredentialing, increased efforts to obtain the necessary information prior to not accepting an application may be necessary. Since Medicaid provider enrollment for OHP FFS did not include a provider credentialing component, HSAG deemed OHP FFS provider admission processes inapplicable for the MHP analysis.

HSAG's analyzed the processes, strategies, and evidentiary standards for OON/OOS limits applied to MH/SUD and determined them to be comparable and no more stringently applied, in writing and in operation, than those applied to M/S OON/OOS limits across all the benefit packages. While OHP FFS's PA process for OOS requests was comparable, it did not use single case agreements (SCAs) for OON providers but instead enrolled providers. This inconsistency was not identified as a parity concern as the comparison of the two different processes was inapplicable for the MHP analysis.

Table 3-1 presents HSAG's overall assessment of AllCare's compliance based on the analysis of the comparability of NQTL strategies and the stringency applied by AllCare when implementing NQTLs.

Table 3-1—Overall MHP Analysis Results—Comparability and Stringency

NQTL Category	Comparability	Stringency
Category I—UM Limits Applied to Inpatient Services	Compliant	Non-Compliant
Category II—UM Limits Applied to Outpatient Services	Compliant	Non-Compliant
Category III—Prior Authorization for Prescription Drug Limits	Compliant	Compliant
Category IV—Provider Admission—Closed Network	Compliant	Compliant
Category V—Provider Admission—Network Credentialing	Compliant	Non-Compliant
Category VI—Out-of-Network/Out-of-State Limits	Compliant	Compliant

Findings and Required Actions

Based on the strategy and evidence provided by AllCare, including reported changes in operations and practices, PA and credentialing data, and discussions during prescheduled conference calls, HSAG analyzed the parity of MH/SUD benefits as compared to M/S benefits. MHP concerns were documented in each NQTL category detailed in Appendix B of this report and identified in this section as either parity findings or inconclusive findings that required more information for a parity determination. HSAG identified required actions for AllCare to pursue to mitigate each finding.

Table 3-2 presents specific findings of non-parity organized by NQTL category. HSAG’s analysis for AllCare resulted in two similar findings across two NQTL categories.

Table 3-2—Parity Findings and Required Actions by NQTL Category

#	NQTL Category	Finding	Required Action
1.	Category I—UM Limits Applied to Inpatient Services	For benefit packages CCOE and CCOG, AllCare’s 14-day RR time frame allowance for IP MH/SUD PAs was more stringent than the 90-day time frame allowed by OHP FFS and its subcontractor for IP M/S benefits under CCOE and CCOG benefit packages.	AllCare should align its IP RR time frame allowance to be consistent with OHP FFS, allowing IP retrospective authorization requests up to 90 days from the date of service. Exceptions should still apply as determined through medical necessity.
2.	Category I—UM Limits Applied to Inpatient Services	For benefit packages CCOE and CCOG, AllCare’s 14-day RR time frame allowance for OP MH/SUD PAs was more stringent than the 90-day time frame allowed by OHA and its subcontractor for OP M/S benefits under CCOE and CCOG benefit packages.	AllCare should align its OP RR time frame allowance to be consistent with OHP FFS, allowing OP retrospective authorization requests up to 90 days from the date of service. Exceptions should still apply as determined through medical necessity.

Table 3-3 presents inconclusive findings of non-parity organized by NQTL category. HSAG’s analysis for AllCare resulted in one inconclusive finding in one NQTL category.

Table 3-3—Inconclusive Findings and Required Actions by NQTL Category

#	NQTL Category	Finding	Required Action
1.	Category V— Provider Admission— Network Credentialing	AllCare’s overall high rates for providers unable to obtain credentialing with the CCO, and the higher percentage of 46.67 percent for MH/SUD providers in relation to the 30.09 percent of M/S providers not credentialed, resulted in an inconclusive parity determination. Although the CCO described its regular distribution of a quick reference guide and cover letter for providers identifying the information needed for credentialing and recredentialing, the data revealed applications were primarily closed due to expiration or not accepted due to missing information.	AllCare should assess its processing of credentialing applications, including the CCO’s efforts to work with providers to obtain or follow up with providers for necessary credentialing information, to determine any parity concerns and opportunities for improvement that could positively impact the CCO’s high rate of applications not accepted or closed.

Data Analysis Results

AllCare submitted UM data in the MHP Required Documentation Template, identifying PA counts and denial data for IP, OP, and prescription drug benefits. The reporting also included data on provider admission counts and terminations/denials. The completed templates included data from the period of January 1, 2020, through June 30, 2020. An analysis of the data reported is presented in the text below pertaining to the following categories:

- Utilization Management for Inpatient/Outpatient Services (NQTL Categories I and II).
- Utilization Management for Prescription Drugs (NQTL Category III).
- Enrollment/Credentialing Decisions (NQTL Categories IV and V).

Any findings related to the data analysis were incorporated into the MHP findings and required actions section above according to the corresponding NQTL category to which the data apply.

Utilization Management for Inpatient/Outpatient Services

AllCare provided requested UM data for IP and OP services pertaining to authorization request counts and outcomes of requests. Table 3-4 presents AllCare’s counts for IP and OP PAs by benefit type, identifying the number of PA requests denied, appealed, and overturned.

Table 3-4—Prior Authorization Counts for Inpatient and Outpatient Services

Prior Authorizations by Benefit Type							
Benefit Type	# of PA Requests	# of PA Requests Denied	% of PA Requests Denied	# of PA Denials Appealed	% of PA Denials Appealed	# of PA Denials Overturned	% of PA Denials Overturned
MH/SUD	907	51	5.62%	1	1.96%	1	1.96%
M/S	20,356	1,164	5.72%	33	2.84%	8	0.69%
Total	21,263	1,215	5.71%	34	2.80%	9	0.74%

Observations

HSAG’s analysis of AllCare’s PA data for IP and OP benefits did not reveal any concerns related to MHP. The following data points were observed:

- Of the total 21,263 IP and OP PA requests reported, only 5.71 percent were denied.
- Of the 51 MH/SUD PA requests denied, representing 5.62 percent of the 907 MH/SUD PA requests, only one denial resulted in an appeal.
- The 51 reported MH/SUD denials represented less than 5 percent (4.20 percent) of total denials.

Utilization Management for Prescription Drugs

AllCare provided requested data pertaining to prescription drug authorization request counts and outcomes. Table 3-5 presents AllCare’s PA counts for formulary and non-formulary prescription drug PA requests, identifying the number of requests overturned.

Table 3-5—Prior Authorization Counts for Prescription Drugs

Prior Authorization Counts (Formulary and Non-Formulary)						
# of PA Requests	# of PA Requests Denied	% of PA Requests Denied	# of PA Denials Appealed	% of PA Denials Appealed	# of PA Denials Overturned	% of PA Denials Overturned
3,060	1,524	49.80%	20	1.31%	3	0.20%

Observations

HSAG’s analysis of AllCare’s counts for prescription drug PA requests did not reveal any concerns related to parity. The following data points were observed:

- Of the total 3,060 prescription drug PA requests reported, 49.80 percent were denied.
- Less than 2 percent of the 1,524 prescription drug PA request denials were appealed, with only three PA denials resulting in an overturned decision.
- The majority of denied prescription drug PA requests were denied for a “not covered” categorical reason.

Enrollment/Credentialing

AllCare provided requested data pertaining to provider enrollment requests and outcomes. Table 3-6 presents AllCare’s enrollment/credentialing counts by provider type, identifying the number of terminations and denials, which includes applications not accepted.

Table 3-6—Enrollment/Credentialing Counts by Provider Type

Enrollment/Credentialing Counts by Provider Type						
Provider Type	Avg. # Enrolled Providers	# Providers Terminated	% Terminated	# of Cred. Requests	# of Cred. Requests Denied/Not Accepted	% of Cred. Requests Denied/Not Accepted
MH/SUD	210	Not Reported	--	15	7	46.67%
M/S	1,475	Not Reported	--	113	34	30.09%
Total	1,685	-	15.13%	128	41	32.03%

Observations

HSAG’s analysis of AllCare’s provider credentialing data revealed concerns related to high rates of applications not accepted for both MH/SUD and M/S providers seeking credentialing during the reporting period. The following data points were observed:

- Of the 1,685 reported average number of providers enrolled during the reporting period, 12.46 percent were MH/SUD providers.
- The total rate of denials/applications not accepted, for all provider types was 32.03 percent, with MH/SUD providers representing 17.07 percent of total denials/applications not accepted.
- Of the MH/SUD providers seeking credentialing during the reporting period, 46.67 percent were unable to obtain credentialing with two applications closed and the remaining five applications not accepted.
- The majority of MH/SUD and M/S denials were due to missing or incomplete information.

Although the credentialing process was the same for both MH/SUD and M/S providers, the disparate rate of applications closed or not accepted for MH/SUD providers (46.67 percent) as compared to M/S providers (30.09 percent) should be explored and addressed for parity concerns and opportunities for improvement. This issue was documented as an inconclusive finding for NQTL Category V and identified in Table 3-3.

Additional Requirement Results

HSAG requested information from AllCare on the required availability of medical necessity determinations regarding MH/SUD benefits to members, potential members, and contracting providers upon request, and how reasons for denial of reimbursement or payment for MH/SUD benefits were made available to members. AllCare described its policies on notices of adverse benefit determination (NOABDs) and how the notices include denial reasons for members. The CCO additionally provided two NOABD examples representing MH/SUD and M/S denials, confirming that denial reasons inclusive of medical necessity determinations were made available to members. A review of AllCare's website showed that the CCO had resources available on its website for members and providers that included information on MH/SUD benefits available, a prescription drug formulary, and clinical practice guidelines. As a result, HSAG determined that AllCare was compliant with the additional administrative MHP requirements.

4. Improvement Plan Process

To the extent MHP findings or concerns were found, OHP and all CCOs are required to complete and submit an improvement plan addressing corrective actions/interventions to resolve all MHP findings. The improvement plan template is provided in Appendix C. For each of the findings documented in Section 3 of this report, AllCare must identify the following:

- Interventions planned by the organization to achieve MHP compliance.
- Individual(s) responsible for ensuring that the planned interventions are completed.
- Proposed timeline for completing each planned intervention with the understanding that most corrective actions/interventions can be completed within three months and no longer than six months. Corrective actions/interventions requiring additional time will need to include specific information to determine the appropriateness of the extended time frame.

The improvement plan is due to HSAG no later than 30 days following the organization's receipt of the final 2020 MHP Analysis report. The improvement plan should be uploaded electronically to OHA's deliverables reporting email address: CCO.MCodeliverableReports@dhsoha.state.or.us. HSAG will review the improvement plan using the following criteria to evaluate the sufficiency of each corrective action/intervention identified in the improvement plan to bring performance into compliance:

- Completeness of the improvement plan document in addressing each finding and identifying a responsible individual, a timeline/completion date, and specific corrective actions/interventions that the organization will take.
- Degree to which the planned corrective actions/interventions are anticipated to bring the organization into compliance with MHP requirements.
- Appropriateness of the timeline for the corrective actions/interventions given the nature of the finding.

Once reviewed, HSAG will communicate to the organization whether the improvement plan is approved. If any corrective actions/interventions are determined to not meet the requirements related to correlating findings, HSAG will identify the discrepancies and require resubmission of the improvement plan until it is approved by HSAG. Quarterly reviews of improvement plan progress will be conducted with each CCO via desk reviews and conference calls as necessary to ensure that all planned activities and interventions are completed.

HSAG will be available for technical assistance related to corrective actions/interventions. The CCO may contact either of the following HSAG representatives for assistance:

Melissa Isavoran, Associate Executive Director
misavoran@hsag.com
503.839.9070

Barb McConnell, Executive Director
bmccconnell@hsag.com
303.717.2105



Appendix A. MHP Evaluation Questionnaire

AllCare submitted its completed MHP Evaluation Questionnaire, which identified changes or additions to benefits design and operations that may impact MHP corresponding with the six NQTL categories. The questionnaire served as a guide for OHA and the CCOs in that responses were used to identify and further document such changes and additions in the finalized MHP NQTL Reporting Tables located in Appendix B of this report.

General Questions for CCOs		
Question		Yes/No
1.	Did the CCO add, change, or eliminate delegated administrative functions to a new or for an existing subcontractor (e.g., UM, provider admission, etc.)? <i>Documentation Required: Provide contractual requirements (e.g., scope of work) for delegated administrative functions.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	Did the CCO add or exclude any specific classifications of drugs from its formulary?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Utilization Management (IP, OP, and Rx) Changes in CCO—MH Parity Analysis Sections I, II, and III		
Question		Yes/No
1.	Did the CCO change payment arrangements with some/all providers (e.g., FFS to sub-capitation, per diem to DRG, reduction in payment levels to specific provider types or for specific benefits)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	Did the CCO add or remove numerical limits (e.g., number of units) to MH/SUD or M/S benefits?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	Did the CCO add or remove non-numerical benefit limits (e.g., scope or duration of benefits, medical necessity criteria, etc.) to MH/SUD or M/S benefits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4.	Did the CCO change timelines for authorization requests for MH/SUD or M/S benefits?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



5.	Did the CCO change documentation requirements for UM requests for MH/SUD or M/S benefits (e.g., evidence of medical necessity, documentation submission requirements)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
6.	Did the CCO change qualifications for reviewers that can authorize or deny requests?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
7.	Did the CCO develop or add medical necessity/level of care criteria for MH/SUD or M/S benefits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8.	Did the CCO change the method for monitoring consistency of MNC application for MH/SUD or M/S benefits (e.g., standards for consistency of MNC, reliability adherence criteria)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.	Did the CCO change/modify penalties for failure to request/receive authorization for MH/SUD or M/S benefits (e.g., payment reductions, exceptions or waivers of penalties)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10.	Did the CCO change frequency, time frames, or conditions of utilization review for MH/SUD or M/S benefits (e.g., RR or CR time frames or conditions)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
11.	<p>What is the number of coverage requests, denials, appeals, appeal overturns, hearings, and hearing overturns experienced during the last full calendar year separately for MH/SUD and M/S for each classification (IP, OP, and Rx)?</p> <p><i>Documentation Required: Provide lists that identify the number of coverage requests, denials, appeals, appeal overturns, hearings, and hearing overturns for the last full calendar year separately for MH/SUD and M/S for each classification (i.e., IP, OP, and Rx). For Rx, include a list identifying the number of drugs subject to PA.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

Provider Network Admission Changes in CCO—MH Parity Analysis Sections IV and V

Question		Yes/No
1.	Did the CCO change its network status from open (accepting new provider applications) to closed (not accepting new provider applications for certain provider types) or from closed to open?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	Did the CCO add, remove, or change provider admission requirements (e.g., special training, education, experience), including as a result of State licensing changes, for any MH/SUD or M/S providers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3.	Were any of the CCO’s providers denied credentialing due to network closure (if applicable) or based on credentialing requirements?	<input type="checkbox"/> Yes



	<i>Documentation Required: Provide a list of the number and percentage of providers denied credentialing (relative to those seeking credentialing, including the number of applications not accepted) or terminated from credentialing and provide the credentialing determination.</i>	<input checked="" type="checkbox"/> No
4.	Did the CCO add or remove any MH/SUD or M/S provider types that are eligible for credentialing/reimbursement for services?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Out-of-Network/Out-of-State Limit Changes in CCO—MH Parity Analysis Section VI		
Question		Yes/No
1.	Did the CCO change processes for <u>accessing</u> OON/OOS coverage for MH/SUD or M/S benefits? <i>Documentation Required: Provide the number and percentage of OON/OOS requests, denials, etc. received during the last calendar year.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.	Did the CCO change its standards for <u>providing</u> OON/OOS coverage for MH/SUD or M/S benefits?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Appendix B. Finalized MHP NQTL Reporting Tables

AllCare submitted a completed MHP Reporting Template, which identified changes or additions to NQTLs that may impact MHP. HSAG synthesized the changes and additions to NQTLs with those reported in the CCO's 2018 MHP Analysis. Below are the finalized MHP NQTLs reported and assessed for the 2020 MHP Analysis by each of the six NQTL categories across MH/SUD and M/S benefits. Each NQTL was addressed based on comparability and stringency standards.

Category I—Utilization Management Limits Applied to Inpatient Services

NQTL: UM limits including PA, CR, RR, and IRR

Benefit Package: CCOA, CCOB, CCOE, and CCOG for adults and children

Classification: IP and emergency care

Overview: MH/SUD and M/S IP benefits require notification for emergency admissions. PA is not required for emergency care, but is applied to most other IP benefits including residential treatment. PA and CR are applied to IP benefits to confirm coverage, assure services are medically necessary and delivered in the least restrictive environment, and reduce overutilization of these high-cost services. These rationalizations were identified as indicators 1, 2 and 4 as listed in comparability and stringency Standard #2 below, which cross-reference to indicators used by OHP FFS. HSAG analyzed NQTLs applied to IP benefits based on information provided related to all six comparability and stringency standards as listed below. The benefit packages were analyzed as follows:

- **Benefit packages A and B:** MH/SUD benefits in columns 1 (CCO MH/SUD) and 2 (FFS MH/SUD) compared using indicators 1–4 to M/S benefits in column 3 (CCO M/S). These benefit packages include MH/SUD IP benefits managed by the CCO and OHA through its subcontractors, Comagine Health and Keystone Peer Review Organization (KEPRO), as compared to M/S IP benefits in column 3 managed by the CCO.
- **Benefit packages E and G:** MH/SUD benefits in columns 1 (CCO MH/SUD) and 2 (FFS MH/SUD) compared using indicators 1, 2, and 4 to M/S benefits in column 4 (FFS M/S). These benefit packages include MH/SUD IP benefits managed by the CCO and OHA through Comagine Health and KEPRO, as compared to M/S IP benefits in column 4 managed by OHA.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
1. To which benefit is the NQTL assigned?			
<ul style="list-style-type: none"> (1, 2, 3, 4) PA and CR are required for planned non-emergency admissions to acute IP (in and OON), PRTS, subacute and 10 days after an IP SUD detoxification admission. (1, 2, 3, 4) Emergency admissions require notification within 48 hours of admission and subsequent CR. (1, 4) Extra-contractual and experimental/investigational/unproven benefit requests (i.e., exceptions) are submitted through a PA-like process. 	<ul style="list-style-type: none"> (1, 4) PA (only) for MH/SUD procedures performed in a medical facility (e.g., gender reassignment surgery authorizations, experimental/investigational, and extra-contractual benefits are conducted by OHA consistent with the information in column 2). (2, 4) A level-of-care review is required for SCIP, SAIP and subacute care that is conducted by an OHA designee. (1, 4) PA for SCIP, SAIP and subacute admission is obtained through a peer-to-peer review between a Comagine psychiatrist and the referring psychiatrist. (1, 2, 4) CR Comagine RR for SCIP and SAIP are performed by Comagine. (1, 2, 4) CR and RR for subacute care are conducted by Comagine. 	<ul style="list-style-type: none"> (1, 2, 3, 4) PA and CR are required for planned non-emergency admissions to IP hospital, (in and OON) and IP hospice/palliative care. (1, 2, 3, 4) Emergency admissions require notification within 48 hours of admission and subsequent CR. (1, 2, 3, 4) Skilled nursing facility benefits (first 20 days) require PA. (1, 4) Extra-contractual and experimental/investigational/unproven benefit requests (i.e., exceptions) are submitted through a PA-like process. 	<ul style="list-style-type: none"> (1, 2, 4) PA and CR are required for in-state and OOS planned surgical procedures (including transplants) and associated imaging, rehabilitation and professional surgical services delivered in an inpatient setting and listed in OAR 410-130-0200, Table 130-0200-1; rehabilitation, and long term acute care (LTAC).(Notification is required for all IP admissions.) (1, 2, 4) PA, CR and RR for Behavior Rehabilitation Services (BRS) are performed by OHA, DHS or OYA designee. (1, 2, 4) PA and CR of skilled nursing facility (SNF) services. (1, 4) Requests for extra-contractual and experimental/investigational /unproven benefits (i.e.,



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
	<ul style="list-style-type: none"> (1, 2, 4) PA, inclusive of a Certificate of Need (CONS) process, and CR, is conducted by Comagine for PRTS. (1, 2, 4) PA, CR for AFH, SRTF, SRTH, YAP, RTF, and RTH are performed by Comagine. 		<p>exceptions) are submitted through a PA-like process.</p>
<p>2. Why is the NQTL assigned to these benefits?</p>			
<ul style="list-style-type: none"> (1) To ensure coverage, medical necessity and prevent unnecessary overutilization (e.g., in violation of relevant OARs and associated Health Evidence Review Commission (HERC) guidelines1). (2) Ensure appropriate treatment in the least restrictive environment that maintains the safety of the individual. (3) Maximize use of INN providers to promote cost-effectiveness when appropriate. (4) To comply with federal and State requirements. 	<ul style="list-style-type: none"> (1) UM is assigned to ensure medical necessity of services and prevent overutilization (2) Ensure appropriate treatment in the least restrictive environment that maintains the safety of the individual (e.g., matching the level of need to the least restrictive setting using the LOCUS – Level-of-Care Utilization System and LSI – Level of Service Inventory or PCSP – Person Centered Service Plan and IBL – Individually-Based Limitations). (4) To comply with federal and State requirements. 	<ul style="list-style-type: none"> (1) To ensure coverage, medical necessity and prevent unnecessary overutilization (e.g., in violation of relevant OARs and associated Health Evidence Review Commission (HERC) guidelines). (2) Ensure appropriate treatment in the least restrictive environment that maintains the safety of the individual. (3) Maximize use of INN providers to promote cost-effectiveness when appropriate. (4) To comply with federal and State requirements. 	<ul style="list-style-type: none"> (1) PA and CR are assigned to ensure medical necessity of services and prevent overutilization (e.g., requests for care that are not medically necessary or in violation of relevant OARs, the Health Evidence Review Commission (HERC) PL and guidelines). (2) Ensure appropriate treatment in the least restrictive environment that maintains the safety of the individual. (4) To comply with federal and State requirements.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
3. What evidence supports the rationale for the assignment?			
<ul style="list-style-type: none"> (1, 2 and 4) HERC PL and guidelines. (1, 2 and 4) ASAM, HERC PL and guidelines, and Milliman Care Guidelines (MCG). Options and Curry to make authorization decisions. Annual cost and utilization reports that confirm IP as a cost driver based on percentage of spend. AllCare currently uses its own cost and utilization reports to identify overutilization. Options looks at change in trend or against benchmark (historical). Once overutilization is identified, Options drills down to determine the root cause. Curry has low hospitalization rates and compares data year-to-year and reviews changes. (1) Options reviews UM data relative to benchmark for high utilizing members (e.g., excessive readmissions relative to diagnosis), trends or patterns (e.g., rise in hospitalization of a specific 	<ul style="list-style-type: none"> (1, 2, and 4) Health Evidence Review Commission (HERC) Prioritized List (PL) and guidelines. The HERC include 13 appointed members which include five physicians, a dentist, a public health nurse, a pharmacist and an insurance industry representative, a provider of complementary and alternative medicine, a behavioral health representative and two consumer representatives. The Commission is charged with maintaining a prioritized list of services, developing or identifying evidence-based health care guidelines and conducting comparative effectiveness research. HERC provides outcome evidence and clinical guidelines for certain diagnoses that may be translated into UM requirements. There are fewer guidelines for 	<ul style="list-style-type: none"> (1, 2 and 4) HERC PL and guidelines and MCG. (1) UM and claims reports are reviewed for trends in overutilization on a quarterly basis (1) Annual cost and utilization reports that confirm IP as a cost driver based on percentage of spend. (2) Medical errors in the hospital is the third leading cause of death in the US. Makary, M. & Daniel, M. Medical Error - The Third Leading Cause of Death in the US, BMJ, 2016;353:i2139. (3) Network providers' credentials have been verified and they have contracted to accept the network rate. (4) Applicable federal and State requirements. 	<ul style="list-style-type: none"> (1, 2 and 4) The HERC PL and guidelines. There are more guidelines for M/S than for MH/SUD because 1) there are more technological procedures (e.g., surgery, devices, procedures and diagnostic tests); and 2) the literature is more robust. (1) InterQual (1) PA staff reports. If the UM team identifies any services for which utilization appears to be increasing (e.g., number of requests) or it appears that the State is paying for medically unnecessary care, the UM team consults with the health analytics team to analyze and evaluate adjustments to PA or CR. (1) Health analytics reports. The health analytics team and policy analysts refer services that have been identified to have



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>age group) and adverse events (e.g., a school suicide) and add or connect to resources to address.</p> <ul style="list-style-type: none"> • (2) Oregon Performance Plan (OPP) requires that BH services be provided in least restrictive setting possible. The OPP is a DOJ-negotiated Olmsted settlement. Also see Roberts, E., Cumming, J & Nelson, K., A Review of Economic Evaluations of Community Mental Health Care, Sage Journals, Oct. 1, 2005, 1-13. Accessed May 25, 2018. • http://journals.sagepub.com/doi/10.1177/1077558705279307 • (2) Inherent restrictiveness of residential settings and dangers associated with seclusion and restraint. Also see Cusack, K.J., Frueh, C., Hiers, T., et. al., Trauma within the Psychiatric Setting: A Preliminary Empirical Report, Human Services Press, Inc., 2003. 453-460. • (3) Network providers' credentials have been verified 	<p>MH/SUD than for M/S. This is because 1) there are fewer technological procedures for MH/SUD (e.g., cognitive behavioral therapy and psychodynamic therapy are billed using the same codes, no surgeries, few devices); 2) the MH/SUD literature is not as robust (e.g., fewer randomized trials, more subjective diagnoses (or the ICD-10-CM diagnoses represent a spectrum) and less standardization in interventions).</p> <ul style="list-style-type: none"> • (1) InterQual. 		<p>increasing utilization to the UM team for evaluation.</p>



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>and they have contracted to accept the network rate.</p> <ul style="list-style-type: none"> (4) Applicable federal and State requirements. 			
<p>4. What are the NQTL procedures?</p>			
<p>Timelines for authorizations:</p> <ul style="list-style-type: none"> PA must be obtained prior to IP admission, except in the case of emergencies, when notification is required following the admission. CR occurs on the last covered day of an authorization. Emergency requests are processed within 24 hours. Urgent requests are processed within 72 hours. Standard requests are to be processed within 14 days. 	<p>Timelines for gender reassignment surgery authorizations: (OHA)</p> <ul style="list-style-type: none"> Standard requests are to be processed within 14 days. <p>Timelines for child residential authorizations: (OHA)</p> <ul style="list-style-type: none"> OHA provides the initial authorization (level-of-care review) within three days of receiving complete requests for SCIP, SAIP or subacute. <p>(Comagine Health)</p> <ul style="list-style-type: none"> Authorization requests for PRTS are submitted prior to admission or within 14 days of an emergency admission. An emergency admission is acceptable only under unusual and extreme circumstances, subject to RR by Comagine. <p>Timelines for adult residential and YAP authorizations:</p>	<p>Timelines for authorizations:</p> <ul style="list-style-type: none"> PA must be obtained prior to IP admission, except in the case of emergencies, when notification is required following the admission. CR occurs on the last covered day of an authorization Emergency requests are processed within 24 hours. Urgent requests are processed within 72 hours. Standard requests are to be processed within 14 days. 	<p>Timelines for authorizations:</p> <ul style="list-style-type: none"> All in-state and out-of-state (OOS) emergency admissions, LTAC, and IP rehabilitation require notification. Notification is preferred within 24 hours of admission, but there is no timeline requirement. Notification allows the State to conduct case management and discharge planning, but does not limit the scope or duration of the benefit. PA is required before admission. OARs require emergency requests be processed within one business day, urgent requests within three business days and standard requests within 14 days; although a backlog may develop.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
	<p>(Comagine Health)</p> <ul style="list-style-type: none"> Emergency requests are processed within one business day, urgent within two business days, and standard requests within 10 business days. 		
<p>Documentation requirements:</p> <ul style="list-style-type: none"> Options may review via EHR. Admission H&P, evaluation and information supporting medical necessity review. Curry reviews H&P and evaluation. AllCare requires admit notice with attestation that ASAM is met. Supporting information may be provided. CR requires updated ASAM or progress notes. 	<p>Documentation requirements (OHA):</p> <ul style="list-style-type: none"> PA documentation requirements for non-residential MH/SUD benefits include a form that consists of a cover page. Diagnostic and CPT code information and a rationale for medical necessity must be provided, plus any additional supporting documentation. The documentation requirement for level-of-care assessment for SCIP, SAIP and subacute is a psychiatric evaluation. Other information may be reviewed when available. <p>Documentation requirements for PRTF CONS and CR for PRTF,</p>	<p>Documentation requirements:</p> <ul style="list-style-type: none"> UM is electronically notified of the admission, enabling review of the medical record. AllCare requires admission information and updated progress notes for OON. 	<p>Documentation requirements:</p> <ul style="list-style-type: none"> PA documentation requirements include a form that consists of a cover page. Diagnostic and CPT code information and a rationale for medical necessity must be provided, plus any additional supporting documentation.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
	<p>SCIP and SAIP (Comagine Health):</p> <ul style="list-style-type: none"> • PRTS CONS requires documentation that supports the justification for child residential services, including: <ul style="list-style-type: none"> – A cover sheet detailing relevant provider and recipient – Medicaid numbers; – Requested dates of service; – HCPCS or CPT Procedure code requested; and – Amount of service or units requested; – A behavioral health assessment and service plan meeting the requirements described in OAR 309-019-0135 through 0140; or – Any additional supporting clinical information supporting medical justification for the services requested; – For substance use disorder services (SUD), the Division uses the 		



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
	<p>American Society of Addiction Medicine (ASAM) Patient Placement Criteria second edition-revised (PPC-2R) to determine the appropriate level of SUD treatment of care.</p> <ul style="list-style-type: none"> There are no specific documentation requirements for CR of PRTS, SCIP or SAIP. <p>Documentation requirements (Comagine Health):</p> <ul style="list-style-type: none"> Documentation may include assessment, service plan, plan-of-care, Level-of-Care Utilization System (LOCUS), Level of Service Inventory (LSI), PCSP, IBL, or other relevant documentation. 		
<p>Method of document submission:</p> <ul style="list-style-type: none"> Clinical information is provided telephonically, electronically or by fax for review. CR can also be done by a nurse in the hospital with access to the EMR. 	<p>Method of document submission (OHA):</p> <ul style="list-style-type: none"> For non-residential MH/SUD services, paper (fax) or online PA requests are submitted prior to the delivery of services for which PA is required. 	<p>Method of document submission:</p> <ul style="list-style-type: none"> An RN has access to the EMR and reviews admission for authorization Hospitals without RN access to EMR fax records daily. 	<p>Method of document submission:</p> <ul style="list-style-type: none"> Paper (fax) or online PA requests are submitted prior to the delivery of services for which PA is required.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<ul style="list-style-type: none"> The reviewer may attend an individual’s treatment review every 3 months, but goes to the hospital daily. 	<ul style="list-style-type: none"> For SCIP, SAIP and subacute level-of-care review, the OHA designee may accept information via fax, mail or secure email and has also picked up information. Supplemental information may be obtained by phone. <p>Method of document submission (Comagine Health):</p> <ul style="list-style-type: none"> Packets are submitted to Comagine by mail, fax, email or web portal for review for child residential services. Telephonic clarification may be obtained. Psychiatrist to psychiatrist review is telephonic. <p>Method of document submission (Comagine Health):</p> <ul style="list-style-type: none"> Providers submit authorization requests for adult MH residential to Comagine Health by mail, fax, email or via portal, but documentation must still be faxed if the request is through portal. Telephonic clarification may be obtained. 		



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>Qualifications of reviewers:</p> <ul style="list-style-type: none"> Both Options and Curry refer all potential IP denials to AllCare psychiatrist for review. Licensed mental health professionals gather relevant clinical information from the provider and conduct medical necessity review. Only a physician can make denial decisions. 	<p>Qualifications of reviewers (OHA):</p> <ul style="list-style-type: none"> OHA M/S staff conduct PA and CR (if applicable) for gender reassignment surgery. The OHA designee is a licensed, master's-prepared therapist that reviews psychiatric evaluations to approve or deny the level-of-care requested. Psychiatric consultation is available if needed. <p>Qualifications of reviewers (Comagine Health):</p> <ul style="list-style-type: none"> Two reviewers with QMHP designation make residential authorization decisions. Two psychiatrists make CONS determinations. <p>Qualifications of reviewers (Comagine Health):</p> <ul style="list-style-type: none"> Comagine Health QMHPs must meet minimum qualifications (see below) and demonstrate the ability to conduct and review an assessment, including identifying precipitating events, gathering histories of mental and physical health, substance use, past mental 	<p>Qualifications of reviewers:</p> <ul style="list-style-type: none"> Licensed nurses gather relevant clinical information from the provider and conduct medical necessity review. Only a physician can make denial decisions. 	<p>Qualifications of reviewers:</p> <ul style="list-style-type: none"> Nurses may authorize and deny authorization requests relative to OAR, HERC PL guidelines and associated notes, and other industry guidelines (e.g., AIM for radiology).



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
	<p>health services and criminal justice contacts, assessing family, cultural, social and work relationships, and conducting/reviewing a mental status examination, complete a DSM diagnosis, and write and supervise the implementation of a PCSP.</p> <ul style="list-style-type: none"> • A QMHP must meet one of the follow conditions: <ul style="list-style-type: none"> – Bachelor’s degree in nursing and licensed by the State of Oregon; – Bachelor’s degree in occupational therapy and licensed by the State of Oregon; – Graduate degree in psychology; – Graduate degree in social work; – Graduate degree in recreational, art, or music therapy; – Graduate degree in a behavioral science field; or • A qualified Mental Health Intern, as defined in 309-019-0105(61). 		



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>Criteria:</p> <ul style="list-style-type: none"> Authorization decisions are based on the State’s definition of medical necessity and OARs, ORS, HERC PL and guidelines, ASAM, or clinical policy/guidelines. AllCare plans to purchase MCG for use by AllCare, Options and Curry to make authorization decisions. 	<p>Criteria (OHA):</p> <ul style="list-style-type: none"> Authorizations for non-residential MH/SUD services are based on the HERC PL and guidelines; Oregon Statute, OAR, and federal regulations; InterQual guidelines; and evidence-based guidelines from private and professional associations. OHA delegates review requests relative to least restrictive environment requirement. <p>Criteria (Comagine Health):</p> <ul style="list-style-type: none"> HERC PL, InterQual, and Comagine policy are used for residential CR. <p>Criteria (Comagine Health):</p> <ul style="list-style-type: none"> QMHPs review information submitted by providers relative to State plan and OAR requirements and develop a PCSP. The PCSP components are entered into MMIS as an authorization. 	<p>Criteria:</p> <ul style="list-style-type: none"> Authorization decisions for adults and children are based on OARs, ORS, HERC PL and guidelines, guidelines issued from appropriate professional associations and health organizations (such as N.I.C.E), current peer-reviewed medical literature, and Up-to-Date, a service providing ongoing review of peer reviewed literature and current guidelines. 	<p>Criteria:</p> <ul style="list-style-type: none"> Authorizations are based on the HERC PL and guidelines; Oregon Statute, OAR, and federal regulations; InterQual guidelines; and evidence-based guidelines from private and professional associations, such as the Society of American Gastrointestinal and Endoscopic Surgeons and InterQual, where no State or federal guidelines exist.
<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> If MNC are not met for the LOC requested, a denial is 	<p>Retrospective Review:</p> <ul style="list-style-type: none"> Retrospective authorization requests can be made within 	<p>Reconsideration/RR:</p>	<p>Retrospective Review:</p> <ul style="list-style-type: none"> Retrospective authorization requests can be made within 90 days of the date



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>issued and an alternative LOC is offered and authorized, for which the reviewer may consult a physician.</p> <ul style="list-style-type: none"> Retrospective authorization requests can be made within 30 days of the date of service; requests for exceptions are considered. Providers may submit a post-service claim for review. 	<p>90 days of the date of service or after the 90 days based on provider demonstration of a specific reason why authorization could not have been obtained within the 90 days.</p> <p>Reconsideration (OHA):</p> <ul style="list-style-type: none"> A provider may request review of an OHA denial decision for nonresidential MH/SUD services. The review occurs in weekly Medical Management Committee (MMC) meetings. Exception requests for experimental and other non-covered benefits may be granted at the discretion of the MMC, which is led by the HSD medical director. If a provider requests review of an OHA delegate level-of-care determination, KEPRO may conduct the second review. <p>Reconsideration (Comagine Health):</p> <ul style="list-style-type: none"> If the facility requests a reconsideration of a CONS 	<ul style="list-style-type: none"> Prior to a denial for IP services, a provider-to-provider review is offered. If MNC are not met for the LOC requested, a denial is issued and an alternative LOC is offered and authorized, for which the reviewer may consult a physician. Retrospective authorization requests can be made within 30 days of the date of service; requests for exceptions are considered. Providers may submit a post-service claim for review. 	<p>of service or after the 90 days based on provider demonstration of a specific reason why authorization could not have been obtained within the 90 days.</p> <p>Reconsideration:</p> <ul style="list-style-type: none"> A provider may request review of a denial decision. The review occurs in weekly MMC meetings. Exception requests for experimental and other non-covered benefits may be granted at the discretion of the MMC, which is led by the OHA’s medical director.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
	<p>denial, a second psychiatrist (who did not make the initial decision) will review the documentation and discuss with the facility in a formal meeting.</p> <ul style="list-style-type: none"> No policy for CR denials. <p>Reconsideration (Comagine Health):</p> <ul style="list-style-type: none"> Within 10 days of a denial, the provider may send additional documentation to Comagine Health for reconsideration. A provider may request review of a denial decision, which occurs in weekly MMC meetings or Comagine Health’s own comparable medical management meeting. 		
<p>Appeals:</p> <ul style="list-style-type: none"> Standard appeal and fair hearing rights apply. 	<p>Appeals (OHA):</p> <ul style="list-style-type: none"> Members may request a hearing on any denial decision. <p>Appeals (Comagine Health):</p> <ul style="list-style-type: none"> Members may request a hearing on any denial decision. <p>Appeals (Comagine Health):</p>	<p>Appeals:</p> <ul style="list-style-type: none"> Members may appeal any denial decision. 	<p>Appeals:</p> <ul style="list-style-type: none"> Standard appeal and fair hearing rights apply.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
	<ul style="list-style-type: none"> Members may request a hearing on any denial decision. 		
<p>Consequences for failure to authorize:</p> <ul style="list-style-type: none"> Failure to obtain authorization can result in non-payment for benefits for which it is required. Failure to provide notification does not result in a financial penalty. 	<p>Consequences for failure to authorize (OHA):</p> <ul style="list-style-type: none"> Failure to obtain authorization for non-residential MH/SUD services can result in non-payment for benefits for which it is required. Failure to obtain notification for non-residential MH/SUD services does not result in a financial penalty. For SCIP, SAIP and subacute, if coverage is retroactively denied, general funds will be used to cover the cost of care. <p>Consequences for failure to authorize (Comagine Health):</p> <ul style="list-style-type: none"> Non-coverage. <p>Consequences for failure to authorize (Comagine Health):</p> <ul style="list-style-type: none"> Failure to obtain authorization can result in non-payment for benefits for which it is required. 	<p>Consequences for failure to authorize:</p> <ul style="list-style-type: none"> Failure to obtain authorization can result in non-payment for benefits for which it is required. Failure to provide notification does not result in a financial penalty. 	<p>Consequences for failure to authorize:</p> <ul style="list-style-type: none"> Failure to obtain authorization can result in non-payment for benefits for which it is required. Failure to obtain notification does not result in a financial penalty.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
5. How frequently or strictly is the NQTL applied?			
<p>Frequency of review (and method of payment):</p> <ul style="list-style-type: none"> • Current AllCare hospital contracts are DRG-based. • CR occurs every 1- 3 days for acute IP reviewed by Curry. The reviewer may attend an individual’s treatment review every 3 months, but goes to the hospital daily. • Authorizations and re-authorizations for AllCare and Options acute IP MH range from 2–5 days, depending on the facility’s recommendation, medical necessity, diagnosis and expected length of stay and the member’s needs. • Both Curry and Options review subacute and PRTS every 30 days • Options just changed the review frequency for SUD residential due to an absence of denials with prior CR frequency. New policy is, if a facility needs more than 90 days, will review. Curry reviews SUD residential every 30 days. 	<p>Frequency of review (and method of payment) (OHA):</p> <ul style="list-style-type: none"> • Gender reassignment surgery is authorized as a procedure. • The initial authorization for SCIP, SAIP, and subacute is 30 days. <p>Frequency of review (and method of payment) (Comagine Health):</p> <ul style="list-style-type: none"> • Child residential services are paid by per diem. • Child residential services authorizations are conducted every 30-90 days. <p>Frequency of review (and method of payment) (Comagine Health):</p> <ul style="list-style-type: none"> • Adult residential authorizations are conducted at least once per year. An independent and qualified agent (IQA) contacts MH provider quarterly for 1915i assessment accuracy. If member’s status changes for more than 30 days, provider can contact IQA for a re-assessment. 	<p>Frequency of review (and method of payment):</p> <ul style="list-style-type: none"> • Current hospital contracts are DRG-based, Critical Access Hospitals (CAH) are paid a percentage of billed charges consistent with State law. • CR occurs daily for IP hospital. • Qualifying SNF stays are reviewed weekly at a minimum. 	<p>Frequency of review (and method of payment):</p> <ul style="list-style-type: none"> • Most IP claims are paid DRG; as a result, CR is infrequently used. • CR is conducted monthly for LTAC and rehabilitation. • The State conducts CR for SNF at a frequency that is determined by the care manager, but not less than one time a year. • Authorization lengths are individualized by condition and are valid for up to a year. • Procedural authorizations are valid for three months.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>RR conditions and timelines:</p> <ul style="list-style-type: none"> Retrospective authorization requests can be made within 30 days of the date of service; requests for exceptions are considered. 	<p>Retrospective Review:</p> <ul style="list-style-type: none"> Retrospective authorization requests can be made within 90 days of the date of service or after the 90 days based on provider demonstration of a specific reason why authorization could not have been obtained within the 90 days. <p>Reconsideration (OHA):</p> <ul style="list-style-type: none"> A provider may request review of an OHA denial decision for nonresidential MH/SUD services. The review occurs in weekly Medical Management Committee (MMC) meetings. Exception requests for experimental and other non-covered benefits may be granted at the discretion of the MMC, which is led by the HSD medical director. If a provider requests review of an OHA delegate level-of-care determination, KEPRO may conduct the second review. <p>Reconsideration (Comagine Health):</p>	<p>RR conditions and timelines:</p> <ul style="list-style-type: none"> Retrospective authorization requests can be made within 30 days of the date of service; requests for exceptions are considered. 	<p>Retrospective Review:</p> <ul style="list-style-type: none"> Retrospective authorization requests can be made within 90 days of the date of service or after the 90 days based on provider demonstration of a specific reason why authorization could not have been obtained within the 90 days. <p>Reconsideration:</p> <ul style="list-style-type: none"> A provider may request review of a denial decision. The review occurs in weekly MMC meetings. Exception requests for experimental and other non-covered benefits may be granted at the discretion of the MMC, which is led by the OHA’s medical director.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
	<ul style="list-style-type: none"> If the facility requests a reconsideration of a CONS denial, a second psychiatrist (who did not make the initial decision) will review the documentation and discuss with the facility in a formal meeting. No policy for CR denials. <p>Reconsideration (Comagine Health):</p> <ul style="list-style-type: none"> Within 10 days of a denial, the provider may send additional documentation to Comagine Health for reconsideration. A provider may request review of a denial decision, which occurs in weekly MMC meetings or Comagine Health’s own comparable medical management meeting. 		
<p>Methods to promote consistent application of criteria:</p> <ul style="list-style-type: none"> No IRR because Options only recently added a second reviewer (Curry only has one). Review criteria application 	<p>Methods to promote consistent application of criteria (OHA):</p> <ul style="list-style-type: none"> Nurses are trained on the application of the HERC PL and guidelines, which is spot-checked through ongoing supervision. Whenever possible, practice 	<p>Methods to promote consistent application of criteria:</p> <ul style="list-style-type: none"> Conducts IRR testing with 90% standard. Outliers receive additional training. 	<p>Methods to promote consistent application of criteria:</p> <ul style="list-style-type: none"> Nurses are trained on the application of the HERC PL and guidelines, which is spot-checked through ongoing supervision.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>during consultation and through chart reviews.</p> <ul style="list-style-type: none"> Options and Curry plan to review 3-5 IP and OP MH/SUD charts for each reviewer annually to evaluate criteria application to a score of 90%. 	<p>guidelines from clinical professional organizations such as the American Medical Association or the American Psychiatric Association, are used to establish PA frequency for non-residential MH/SUD services.</p> <ul style="list-style-type: none"> There are only two OHA designee reviewers for level-of-care review for SCIP, SAIP, and subacute and no specific criteria, so N/A. <p>Methods to promote consistent application of criteria (Comagine Health):</p> <ul style="list-style-type: none"> Parallel chart reviews for the two reviewers. (No criteria.) <p>Methods to promote consistent application of criteria (Comagine Health):</p> <ul style="list-style-type: none"> Monthly clinical team meetings in which randomly audited charts are reviewed/discussed by peers using Comagine Health compliance department-approved audit tool. 		<p>Whenever possible, practice guidelines from clinical professional organizations such as the American Medical Association or the American Psychiatric Association, are used to establish PA frequency for services in the FFS system.</p>



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
	<ul style="list-style-type: none"> Results of the audit are compared, shared and discussed by the team and submitted to Compliance Department monthly for review and documentation. Individual feedback is provided to each clinician during supervision on their authorization as well as plan-of-care reviews. 		
6. What standard supports the frequency or rigor with which the NQTL is applied?			
<ul style="list-style-type: none"> Evidence for UM frequency: Cost trends. Expected ALOS or a time at which progress is anticipated, so reviews are scheduled to recur at the time of expected progress or to confirm D/C planning. AllCare plans to purchase MCG, which will provide another evidence base for determining frequency of review. Oregon CCO contract. 42 CFR Part 441, Subpart D requiring PRTF is reviewed at least every 30 days (§441.155) for child providers. 	<p>Evidence for UM frequency (OHA (and designee for level-of-care review), Comagine and KEPRO):</p> <ul style="list-style-type: none"> PA length and CR frequency are tied to HERC PL and guidelines, OAR, CFRs, InterQual, reviewer expertise and timelines for expectations of improvement. 	<p>Evidence for UM frequency:</p> <ul style="list-style-type: none"> Cost trends. The UM RN reviews a SNF stay based on an appropriate timeframe for monitoring the member’s response to the skilled care. OAR Chapter 411, Division 70 is utilized for criteria. 	<p>Evidence for UM frequency:</p> <ul style="list-style-type: none"> PA length and CR frequency are tied to HERC PL and guidelines, DRGs, OAR, CFRs, InterQual, reviewer expertise and timelines for expectations of improvement.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>Data reviewed to determine UM application:</p> <ul style="list-style-type: none"> Utilization review reports Denial/overturn rates. Approval rates. Number of PA and CR requests. IRR standard. 	<p>Data reviewed to determine UM application:</p> <ul style="list-style-type: none"> Denial/appeal overturn rates; number of PA requests; stabilization of cost trends; and number of hearings requested. These data are reviewed in subcontractor reports, on a quarterly basis by the State. (Applicable to non-residential MH/SUD services.) <p>Data reviewed to determine UM application (Comagine Health):</p> <ul style="list-style-type: none"> N/A <p>Data reviewed to determine UM application (Comagine Health):</p> <ul style="list-style-type: none"> N/A 	<p>Data reviewed to determine UM application:</p> <ul style="list-style-type: none"> Utilization reports Denial/overturn rates. Approval rates. Number of PA and CR requests. IRR standard. 	<p>Data reviewed to determine UM application:</p> <ul style="list-style-type: none"> A physician led group of clinical professionals conducts an annual review to determine which services receive or retain PA. Items reviewed include: <ul style="list-style-type: none"> Utilization. Approval/denial rates. Documentation/justification of services. Cost data.
<p>IRR standard:</p> <ul style="list-style-type: none"> Inter-rater reliability testing is performed on an annual basis between reviewers to ensure consistency in the review process, 90% testing standard. 	<p>IRR standard (OHA):</p> <ul style="list-style-type: none"> KEPRO has a formal policy including an 80% standard using InterQual criteria, conducting reviews at least annually. <p>IRR standard (Comagine Health):</p>	<p>IRR standard:</p> <ul style="list-style-type: none"> Inter-rater reliability testing is performed on an annual basis between reviewers to ensure consistency in the review process, 90% testing standard. 	<p>IRR standard (OHA):</p> <ul style="list-style-type: none"> KEPRO has a formal policy including an 80% standard using InterQual criteria, conducting reviews at least annually.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
	<ul style="list-style-type: none"> Spot-checks performed through supervision. Formal policy to be developed. <p>IRR standard (Comagine Health):</p> <ul style="list-style-type: none"> Spot-checks performed through supervision. 		

Analysis

AllCare was responsible for delivering IP MH/SUD and M/S Medicaid benefits to members in all four benefit packages (CCOA, CCOB, CCOE, and CCOG), whereas OHP FFS was fully managing IP M/S benefits for CCOE and CCOG benefit packages. Emergency MH/SUD and M/S IP hospital admissions required notification, with most ongoing IP services requiring subsequent CR. Regarding nonemergent CCO MH/SUD and M/S IP admissions, PA or level-of-care approval was required. PA was also required for extra-contractual coverage requests (including experimental services); planned surgical procedures (including transplants); and associated imaging, rehabilitation, and professional surgical services delivered in an IP setting and listed in OAR 410-130-0200, Table 130-0200-1. For psychiatric residential treatment services (PRTS) benefits (e.g., Secure Children’s Inpatient Treatment Programs [SCIP], Secure Adolescent Inpatient Treatment Programs [SAIP], and adult and youth residential services) delivered under all benefit packages, OHP FFS’s subcontractor, Comagine Health, was conducting the certificate of need (CON) and PA processes, with the CCO conducting CR for those services. The CCO was also conducting CR for MH/SUD subacute benefits. For M/S benefits under CCOA and CCOB benefit packages, the CCO was conducting PA and CR for SNF benefits for the first 20 days, with subsequent management being conducted by OHP FFS.

HSAG’s analysis of AllCare’s PA data for IP and OP benefits did not reveal any concerns related to MHP. Of the total 21,263 IP and OP PA requests reported, only 5.71 percent were denied. Only 5.62 percent of MH/SUD PA requests were denied, with only one of the denials resulting in an appeal.

Comparability

UM was assigned to MH/SUD and M/S IP benefits primarily using four rationales: 1) To ensure coverage, medical necessity, and prevent unnecessary overutilization (e.g., in violation of relevant OARs, HERC PL and guidelines, or clinical practice guidelines or research); 2) To ensure appropriate treatment in the least restrictive environment that maintains the safety of the individual; 3) To maximize use of in-network (INN) providers to promote cost-effectiveness when appropriate; and 4) To comply with federal and State requirements. HSAG determined the rationale and evidence to be comparable.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>Emergency MH/SUD and M/S IP hospital admissions required notification within 48 hours, with child emergency residential admissions separately requiring notification within 14 days. Most CCO documentation requirements for MH/SUD include an admission note and records submitted via telephone, fax, or electronically. OARs required authorization decisions within 24 hours for emergencies, 72 hours for urgent requests, and 14 days for standard requests. Both AllCare and OHP FFS adhered to these requirements across the benefit packages. Providers were encouraged to submit requests for authorization sufficiently in advance to be consistent with the OAR time frames. Most ongoing IP services required subsequent CR. Documentation requirements for child residential PA/level-of-care review included a psychiatric evaluation or a psychiatrist-to-psychiatrist telephonic review. Comagine Health, OHP FFS’s subcontractor, accepted information for child residential CR via mail, email, fax, and Web portal. Adult and youth residential required an assessment (i.e., completion of a relevant level-of-care tool [e.g., ASAM, LSI, or LOCUS]) and plan-of-care consistent with State plan requirements. Comagine Health documentation submission could be done using mail, email, fax, or Web portal. Consistent with OARs, federal CON procedures, and due to the potential absence of a psychiatric referral, the PRTS documentation requirements included a cover sheet, a behavioral health assessment, and service plan meeting the requirements described in OAR 309-019-0135 through 0140. HSAG determined the MH/SUD authorization time frames and documentation requirements were comparable to those applied to M/S authorization requests.</p>			
<p><u>Stringency</u></p> <p>Qualified individuals conducted UM applying OARs, HERC, MCG, national guidelines, and ASAM for CCO SUD. While the CCO and OHP FFS subcontractors required all MH/SUD and M/S denials to be made by professional peers, nurses could deny benefits managed by OHP FFS. HSAG determined this difference to be an issue of quality rather than parity. OHP FFS’s subcontractor, Comagine Health, made denial determinations for level-of-care review for certain child residential services. Both the CCO and OHA allowed RR for MH/SUD and M/S when providers failed to obtain authorization. Although exceptions to these time frames were allowed by both the CCO and OHP FFS, AllCare’s 14-day RR time frame allowance for IP MH/SUD PAs was more stringent than the 90-day time frame allowed by OHP FFS and its subcontractor for IP M/S benefits. For adult and youth residential services, Comagine Health allowed reconsideration of denials with the submission of additional documentation within 10 days of the denial. For OHP FFS and Comagine Health, the review of denial decisions occurred during MMC meetings. MH/SUD and M/S denial decisions could be challenged through appeals and/or State fair hearing processes. Failure to obtain authorization could result in noncoverage, although SCIP, SAIP, and subacute services could be covered by general fund dollars.</p> <p>Regarding IRR, the CCO conducted regular reviews using a 90 percent testing goal, whereas the OHP FFS subcontractor, KEPRO, had an 80 percent testing standard for M/S benefit authorizations. HSAG did not determine this discrepancy to be a parity concern as the method to promote consistency was more structured for MH/SUD benefits.</p>			



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
Outcome			
<p>HSAG’s analysis determined that the rationale, documentation requirements, processes, and frequency of UM applied to IP MH/SUD benefits were comparable to those applied to IP M/S benefits; however, it was determined that the rigor with which UM was applied to MH/SUD benefits was more stringent in relation to RR for CCOG and CCOG benefit packages as detailed in the finding below.</p> <p>Parity Finding #1: For benefit packages CCOE and CCOG, AllCare’s 14-day RR time frame allowance for IP MH/SUD PAs was more stringent than the 90-day time frame allowed by OHP FFS and its subcontractor for IP M/S benefits under CCOE and CCOG benefit packages.</p> <p>Required Action: AllCare should align its IP RR time frame allowance to be consistent with OHP FFS, allowing IP retrospective authorization requests up to 90 days from the date of service. Exceptions should still apply as determined through medical necessity.</p>			



Category II—Utilization Management Limits Applied to Outpatient Services

NQTL: UM limits including PA, CR, RR, and IRR

Benefit Package: CCOA, CCOB, CCOE, and CCOG for adults and children

Classification: OP

Overview: UM is assigned to OP MH/SUD and M/S benefits to confirm coverage, meet federal requirements in providing benefits in the least restrictive environment, evaluate the safety of certain OP services, and prevent overutilization that has been identified by specific medical necessity criteria or in utilization reports. These rationalizations are identified as indicators 1, 2, and 3 as listed in comparability and stringency Standard #2 below, which cross-reference to indicators used by OHP FFS. HSAG analyzed NQTLs applied to OP benefits based on information provided related to all six comparability and stringency standards as listed below. The benefit packages were analyzed as follows:

- **Benefit packages A and B:** MH/SUD benefits in columns 1 (FFS/home- and community-based services [HCBS] 1915[c][i] MH/SUD) and column 3 (CCO MH/SUD) compared using indicators 1–4 to M/S benefits in columns 2 (FFS/HCBS 1915[c][k][j] M/S) and 4 (CCO M/S), respectively. These benefit packages include MH/SUD IP benefits managed by the CCO and OHA through its subcontractors, Comagine Health and KEPRO.
- **Benefit packages E and G** MH/SUD benefits in columns 1 (FFS/HCBS 1915[c][i] MH/SUD) and column 3 (CCO MH/SUD) compared using indicators 1, 2, and 4 to M/S benefits in columns 2 (FFS/HCBS 1915[c][k][j] M/S) and 5 (FFS M/S), respectively. These benefit packages include MH/SUD IP benefits managed by the CCO and OHP FFS through its subcontractors, Comagine Health and KEPRO.

FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
1. To which benefit is the NQTL assigned?				
<ul style="list-style-type: none"> • (2) Applied Behavior Analysis (ABA). • (2) OT, PT, ST for MH conditions are 	The following services are managed by DHS: <ul style="list-style-type: none"> • (1) 1915(c) Comprehensive DD waiver. 	<ul style="list-style-type: none"> • (2, 3, 4) OON OP services. 	<ul style="list-style-type: none"> • (2, 3, 4) OON OP services. 	The following services are managed by OHA: <ul style="list-style-type: none"> • (2, 3) Out of hospital births.



FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<p>managed through RR; PA is not required.</p>	<ul style="list-style-type: none"> • (1) 1915(c) Support Services DD waiver. • (1) 1915(c) Behavioral DD Model waiver. • (1) 1915(c) Aged & Physically Disabled waiver. • (1) 1915(c) Hospital Model waiver. • (1) 1915(c) Medically Involved Children’s NF waiver. • (1) 1915(k) Community First Choice State Plan option. • (1) 1915(j): Self-directed personal assistance. 	<ul style="list-style-type: none"> • (2, 3) Investigational and Experimental Services. • (2, 3) ABA. • (2) Acupuncture. • (2) DME. • (2) Medical nutritional. • (2) Medical specialty visits. • (2) Neuro-psych testing. • (2, 3) OP hospice/palliative care • (2) Psych evaluation for bariatric surgery • (2) PT, OT, ST • (2) Video EEG 	<ul style="list-style-type: none"> • (2, 3) Investigational and Experimental Services. • (2) Acupuncture. • (2) DME. • (2) Medical nutritional (2) Medical specialty visits. • (2) Neuro-psych testing. • (1, 2) OP hospice/palliative care. • OP surgery. • (2) Psych evaluation for bariatric surgery. • (2) Video EEG. 	<ul style="list-style-type: none"> • (2) Home health services. • (2) OT, PT, ST for MH conditions are managed through RR; PA is not required. • (2, 3) Imaging. • (2) DME.
<p>2. Why is the NQTL assigned to these benefits?</p>				
<ul style="list-style-type: none"> • (2) HERC PL. • (2) OAR 410-172-0650 for ABA services. • (2) PA requests with insufficient documentation to demonstrate MNC or 	<ul style="list-style-type: none"> • (1) The State requires PA of HCBS in order to meet federal requirements regarding PCSPs and ensure services are provided in accordance with a participant’s PCSP 	<ul style="list-style-type: none"> • (2) To ensure coverage, medical necessity and prevent unnecessary overutilization. • (3) Ensure appropriate treatment in the least restrictive environment that 	<ul style="list-style-type: none"> • (2) To ensure coverage, medical necessity and prevent unnecessary overutilization. • (3) Ensure appropriate treatment in the least restrictive environment that maintains the 	<ul style="list-style-type: none"> • (2) To prevent services being delivered in violation of relevant OARs, associated HERC PL and guidelines and federal regulations. • (3) Services are associated with

FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
HERC PL guidelines are not being followed.	and in the last restrictive setting.	maintains the safety of the individual. <ul style="list-style-type: none"> (4) Maximize use of INN providers to promote cost-effectiveness when appropriate. 	safety of the individual. <ul style="list-style-type: none"> (4) Maximize use of INN providers to promote cost-effectiveness when appropriate. 	increased health or safety risks.
3. What evidence supports the rationale for the assignment?				
<ul style="list-style-type: none"> (2) HERC PL. (2) OAR 410-172-0650 for ABA services. (2) PA requests with insufficient documentation to demonstrate medical necessity is not being met or HERC PL guidelines are not being followed. 	<ul style="list-style-type: none"> (1) Federal requirements regarding PCSPs for 1915(c), 1915(k), and 1915(j) services (e.g., 42 CFR 441.301, 441.468, and 441.540) and the applicable approved 1915(c) waiver application/State plan amendment. (1) Federal requirements regarding 1915(c) and 1915(i) services require that HCBS are provided in the least restrictive setting possible. 	<ul style="list-style-type: none"> (2) OARs, HERC PL and guidelines, and federal guidelines, and clinical practice guidelines. (2) UM and claims reports are reviewed for trends in overutilization on a quarterly basis. (2) Annual cost and utilization reports. (3) Oregon Performance Plan (OPP) requires that BH services be provided in least restrictive setting possible. The OPP is a DOJ-negotiated Olmsted settlement. 	<ul style="list-style-type: none"> (2) OARs, HERC PL and guidelines, and federal guidelines. (2) UM and claims reports are reviewed for trends in overutilization on a quarterly basis. (2) Annual cost and utilization reports. (3) HERC guidelines re safety concerns. (4) Network providers' credentials have been verified and they have contracted to accept the network rate. 	<ul style="list-style-type: none"> (2) HERC PL. (2) PA requests with insufficient documentation to demonstrate medical necessity are not being met or HERC PL guidelines are not being followed. (3) HERC Guidelines - Recommended limits on services for member safety.

FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
		<ul style="list-style-type: none"> (3) HERC guidelines re safety concerns. (4) Network providers' credentials have been verified and they have contracted to accept the network rate. 		
4. What are the NQTL procedures?				
<p>Timelines for authorizations:</p> <ul style="list-style-type: none"> Urgent requests are processed in three business days and immediate requests in one business day. Routine requests are processed in 14 days. OT, PT, ST for MH conditions are managed through RR; PA is not required. 	<p>Timelines for authorizations:</p> <ul style="list-style-type: none"> A PCSP must be approved within 90 days from the date a completed application is submitted. 	<p>Timelines for authorizations:</p> <ul style="list-style-type: none"> Provider expected to wait for authorization to deliver services, but 14-day retro submission permitted. Emergency requests are processed within 24 hours. Urgent requests are processed within 72 hours. Standard requests are to be processed within 14 days. 	<p>Timelines for authorizations:</p> <ul style="list-style-type: none"> Provider expected to wait for authorization to deliver services, but 14-day retro submission permitted. Emergency requests are processed within 24 hours. Urgent requests are processed within 72 hours. Standard requests are to be processed within 14 days. 	<p>Timelines for authorizations:</p> <ul style="list-style-type: none"> Urgent requests are processed in three business days and immediate requests in one business day. Routine requests are processed in 14 days. OT, PT, ST for MH conditions are managed through RR; PA is not required.
<p>Documentation requirements:</p> <ul style="list-style-type: none"> Form is one cover page. 	<p>Documentation requirements:</p> <ul style="list-style-type: none"> The PCSP is based on a functional needs assessment and other supporting 	<p>Documentation requirements:</p> <ul style="list-style-type: none"> Prior to service delivery, provider makes request via 	<p>Documentation requirements:</p> <ul style="list-style-type: none"> Prior to service delivery, provider makes request via 	<p>Documentation requirements:</p> <ul style="list-style-type: none"> A cover page form is required. In addition, diagnostic information, a CPT



FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<ul style="list-style-type: none"> Require diagnostic and CPT code and rationale for medical necessity plus any additional supporting documentation. In addition, as part of the supporting documentation ABA must have an evaluation and referral for treatment from a licensed practitioner described in OAR 410-172-0760 (1)(a-d) and a treatment plan from a licensed health care professional described in 410-172-0650(B). Documentation supporting medical necessity is required at the time of billing for OT, PT, ST services. 	<p>documentation. It is developed by the individual, the individual’s team, and the individual’s case manager.</p>	<p>telephone, or fax; one-page form available upon request.</p> <ul style="list-style-type: none"> Most PA criteria require documentation to support medical appropriateness and FDA-approved use. 	<p>telephone, or fax; one-page form available upon request.</p> <ul style="list-style-type: none"> Most PA criteria require documentation to support medical appropriateness and FDA-approved use. 	<p>code(s), a rationale for medical necessity plus any additional supporting documentation are required.</p> <ul style="list-style-type: none"> Documentation supporting medical necessity is required at the time of billing for OT, PT, ST services.
<p>Method of document submission:</p> <ul style="list-style-type: none"> Paper (fax) or online PA/POC submitted 	<p>Method of document submission:</p> <ul style="list-style-type: none"> All 1915(c), 1915(k), and 1915(j) services must be included in a participant’s PCSP 	<p>Method of document submission:</p> <ul style="list-style-type: none"> Curry Community Health requires telephonic screening for PA. After three 	<p>Method of document submission:</p> <ul style="list-style-type: none"> Documentation may be submitted via fax, 	<p>Method of document submission:</p> <ul style="list-style-type: none"> Paper (fax) or online PA/POC submitted



FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<p>prior to the delivery of services.</p>	<p>and approved by a qualified case manager at the local case management entity (CME) prior to service delivery.</p> <ul style="list-style-type: none"> Information is obtained during a face-to-face meeting, often at the individual's location. 	<p>sessions, provider submits assessment and POC with request for number of sessions.</p> <ul style="list-style-type: none"> Subsequent UM involves completion of one-page form and supporting documentation, telephonic review may be required for additional information. Options for Southern Oregon: State regulatory requirements (e.g., a service plan, mental health assessment in the last year, and information supporting medical necessity) are obtained to confirm related requirements are met for non-Options providers. No referral or PA needed for evaluation. Automatic three- 	<p>telephone and/or online.</p>	<p>prior to the delivery of services.</p>



FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
		month authorization (i.e., no document submission) for in-network providers. <ul style="list-style-type: none"> • UM is necessary for continuing services and requires a one-page form. 		
Qualifications of reviewers: <ul style="list-style-type: none"> • For ABA services, physicians review services. • For OT, PT, ST services, nurses may authorize and deny services. • Professional peers deny for other OP services. 	Qualifications of reviewers: <ul style="list-style-type: none"> • A case manager must have at least: <ul style="list-style-type: none"> – A bachelor's degree (BA) in behavioral science, social science, or a closely related field; or – A BA in any field AND one year of human services related experience; or – An associate's degree (AA) in a behavioral science, social science, or a closely related field AND two 	Qualifications of reviewers: <ul style="list-style-type: none"> • Nurses authorize services, but only a physician can issue a denial. 	Qualifications of reviewers: <ul style="list-style-type: none"> • Nurses authorize services, but only a physician can issue a denial. 	Qualifications of reviewers: <ul style="list-style-type: none"> • Nurses may authorize and deny services.

FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
	<p>years human services related experience; or</p> <ul style="list-style-type: none"> • Three years of human services related experience. 			
<p>Criteria:</p> <ul style="list-style-type: none"> • Authorizations are based on applicable HERC guidelines, Oregon Statute, Oregon Administrative rules, federal regulations, and evidence-based guidelines from private and professional associations such as the American Psychiatric Association, where no State or federal guidelines exist. 	<p>Criteria:</p> <ul style="list-style-type: none"> • Qualified case managers approve or deny services in the PCSP consistent with waiver/state plan and OAR requirements. • Once a PCSP is approved, it is entered into the payment management system as authorization by the CME staff. 	<p>Criteria:</p> <ul style="list-style-type: none"> • Authorizations are based on HERC PL and guidelines, ASAM, MCG, OARs and Oregon Statute, guidelines from medical associations/health organizations and peer-reviewed literature. 	<p>Criteria:</p> <ul style="list-style-type: none"> • Authorizations are based on HERC PL and guidelines, MCG, OARs, and Oregon Statute, guidelines from medical associations/health organizations (e.g. NICE and UpToDate) and peer-reviewed literature. 	<p>Criteria:</p> <ul style="list-style-type: none"> • Authorizations are based on applicable HERC PL and guidelines, Oregon Revised Statute, OAR, federal regulations, and evidence-based guidelines from private and professional associations such as the Society of American Gastrointestinal and Endoscopic Surgeons where no State or federal guidelines exist.
<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> • A provider may request review of a denial decision, which 	<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> • (c) NA 	<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> • If providers fail to obtain authorization in advance, they may 	<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> • If providers fail to obtain authorization in advance, they may 	<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> • A review of a denial decision can be requested and is



FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<p>occurs in weekly MMC meetings or Comagine’s own comparable MMC meeting.</p> <ul style="list-style-type: none"> RR authorization requests can be made within 90 days of the date of service or after the 90 days based on provider demonstration of a specific reason why authorization could not have been obtained within the 90 days. OT, PT, ST are reviewed after the initial service prior to payment. Additionally, denial decisions can be requested and reviewed at weekly MMC meetings. 		<p>submit a post-service claim for review.</p>	<p>submit a post-service claim for review.</p>	<p>reviewed in weekly MMC meetings.</p> <ul style="list-style-type: none"> RR authorization requests can be made within 90 days of the date of service or after the 90 days based on provider demonstration of a specific reason why authorization could not have been obtained within the 90 days. OT, PT, ST are reviewed after the initial service prior to payment. Additionally, denial decisions can be requested and reviewed at weekly MCM meetings.
<p>Consequences for failure to authorize:</p>	<p>Consequences for failure to authorize:</p>	<p>Consequences for failure to authorize:</p> <ul style="list-style-type: none"> Failure to obtain authorization can result in non-payment 	<p>Consequences for failure to authorize:</p> <ul style="list-style-type: none"> Failure to obtain authorization can result in non-payment 	<p>Consequences for failure to authorize:</p> <ul style="list-style-type: none"> Failure to obtain authorization may

FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<ul style="list-style-type: none"> Failure to obtain authorization may result in non-payment. 	<ul style="list-style-type: none"> Failure to obtain authorization may result in non-payment. 	<p>for benefits for which it is required.</p>	<p>for benefits for which it is required.</p>	<p>result in non-payment.</p>
<p>Appeals:</p> <ul style="list-style-type: none"> Notice and fair hearing rights apply. 	<p>Appeals:</p> <ul style="list-style-type: none"> Notice and fair hearing rights apply. 	<p>Appeals:</p> <ul style="list-style-type: none"> Initial decisions for non-payment may be appealed to AllCare and to the State. Fair hearing processes apply. There are no differences in processes for children and adults that are not tied to practice guidelines. 	<p>Appeals:</p> <ul style="list-style-type: none"> Initial decisions for non-payment may be appealed to AllCare and to the State. Fair hearing processes apply. There are no differences in processes for children and adults that are not tied to practice guidelines. 	<p>Appeals:</p> <ul style="list-style-type: none"> Notice and fair hearing rights apply.
<p>5. How frequently or strictly is the NQTL applied?</p>				
<p>Frequency of review:</p> <ul style="list-style-type: none"> PA is granted for different LOS depending on the service and can be adjusted. PAs for extensive services usually range from 6 months to 1 year. ABA is usually multiple service codes 	<p>Frequency of review:</p> <ul style="list-style-type: none"> PCSPs are reviewed and revised as needed, but at least every 12 months. 	<p>Frequency of review:</p> <ul style="list-style-type: none"> All services subject to PA are reviewed for accordance with guideline criteria. Typically, the frequency range for PA approval is one year, unless requested less time by the ordering provider. 	<p>Frequency of review:</p> <ul style="list-style-type: none"> All services subject to PA are reviewed for accordance with guideline criteria. Typically, the frequency range for PA approval is one year, unless requested less time by the ordering provider. 	<p>Frequency of review:</p> <ul style="list-style-type: none"> PA is granted for different authorization periods depending on the service and can be adjusted. PAs for extensive services usually range from 6 months to 1 year. Exceptions may be made at the discretion of the MMC, which is



FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<p>approved for 6 months.</p> <ul style="list-style-type: none"> • Exceptions may be made at the discretion of the MMC, which is led by the HSD medical director. 		<ul style="list-style-type: none"> • When PA is exhausted, additional three months can be approved, up to one year. • DME and therapies are based on need and prescription length. • Length of PA can be less, but not more restrictive than HERC, if requested by the provider. • PA denial/approval and appeal rates are monitored by UM staff and reported to the Quality Committee. • PA criteria are reviewed for appropriateness on a biennial basis or sooner if needed. 	<ul style="list-style-type: none"> • When PA is exhausted, additional three months can be approved, up to one year. • DME and therapies are based on need and prescription length. • Length of PA can be less, but not more restrictive than HERC, if requested by the provider. • PA denial/approval and appeal rates are monitored by UM staff and reported to the Quality Committee. • PA criteria are reviewed for appropriateness on a biennial basis or sooner if needed. 	<p>led by the HSD medical director.</p>
<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> • A provider may request review of a denial decision, which occurs in weekly MMC meetings or Comagine’s own 	<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> • NA 	<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> • Providers may provide additional information for a reconsideration of a denial. 	<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> • Providers may provide additional information for a reconsideration of a denial. 	<p>Reconsideration/RR:</p> <ul style="list-style-type: none"> • A review of a denial decision can be requested and is reviewed in weekly MMC meetings. • RR authorization requests can be made



FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<p>comparable MMC meeting.</p> <ul style="list-style-type: none"> RR authorization requests can be made within 90 days of the date of service or after the 90 days based on provider demonstration of a specific reason why authorization could not have been obtained within the 90 days. OT, PT, ST are reviewed after the initial service prior to payment. Additionally, denial decisions can be requested and reviewed at weekly MMC meetings. 		<ul style="list-style-type: none"> Post-claim review process available for 14 days. 	<ul style="list-style-type: none"> Post-claim review process available for 14 days. 	<p>within 90 days of the date of service or after the 90 days based on provider demonstration of a specific reason why authorization could not have been obtained within the 90 days.</p> <ul style="list-style-type: none"> OT, PT, ST are reviewed after the initial service prior to payment. Additionally, denial decisions can be requested and reviewed at weekly MCM meetings.
<p>Methods to promote consistent application of criteria:</p> <ul style="list-style-type: none"> For ABA, a sample of cases are reviewed for ability to address assessed member needs and whether OARs were met. 	<p>Methods to promote consistent application of criteria:</p> <ul style="list-style-type: none"> DHS Quality Assurance Review teams review a representative sample of PCSPs as part of quality assurance and case review activities 	<p>Method to promote consistent application of criteria:</p> <ul style="list-style-type: none"> Inter-rater reliability testing is performed on an annual basis between reviewers to ensure consistency in the review process. 	<p>Method to promote consistent application of criteria:</p> <ul style="list-style-type: none"> Inter-rater reliability testing is performed on an annual basis between reviewers to ensure consistency in the review process. 	<p>Methods to promote consistent application of criteria:</p> <ul style="list-style-type: none"> Nurses are trained on the application of the HERC guidelines, which is spot checked through ongoing supervision.

FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
	<p>to assure that PCSPs meet program standards.</p> <ul style="list-style-type: none"> • Additionally, OHA staff review a percentage of files to assure quality and compliance. 			
<p>6. What standard supports the frequency or rigor with which the NQTL is applied?</p>				
<p>Evidence for UM frequency:</p> <ul style="list-style-type: none"> • HERC guidelines (for ABA and OT, PT, ST) of which there are more M/S than MH/SUD because 1) there are more technological procedures (e.g., surgery, devices, procedures and diagnostic tests); 2) the literature is more robust. • The amount of time a PA covers for services is limited by OAR 410-120-1320(7) which states that PAs can be approved and 	<p>Evidence for UM frequency:</p> <ul style="list-style-type: none"> • Federal requirements regarding PCSPs and 1915(c), 1915(k), and 1915(j) services (e.g., 42 CFR 441.301, 441.468, and 441.540) and the applicable approved 1915(c) waiver application/State plan amendment. 	<p>Evidence for UM frequency:</p> <ul style="list-style-type: none"> • All services subject to PA are reviewed for accordance with guideline criteria and OARs. • PA guidelines are created by UM Manager and Chief Medical Officer after reviewing relevant published peer-reviewed, evidence-based literature (good quality randomized control trials, clinical and/or systematic reviews), as well as clinical practice guidelines from 	<p>Evidence for UM frequency:</p> <ul style="list-style-type: none"> • All services subject to PA are reviewed for accordance with guideline criteria and OARs. • PA guidelines are created by UM Manager and Chief Medical Officer after reviewing relevant published peer-reviewed, evidence-based literature (good quality randomized control trials, clinical and/or systematic reviews), as well as clinical practice guidelines from 	<p>Evidence for UM frequency:</p> <ul style="list-style-type: none"> • HERC guidelines of which there are more M/S than MH/SUD because 1) there are more technological procedures (e.g., surgery, devices, procedures and diagnostic tests); and 2) the literature is more robust. • The amount of time a PA covers for services is limited by OAR 410-120-1320(7) which states that PAs can be approved and renewed up to one year at a time.

FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<p>renewed up to one year at a time.</p> <ul style="list-style-type: none"> Whenever possible, practice guidelines from clinical professional organizations such as the American Medical Association or the American Psychiatric Association, are used to establish PA frequency. 		<p>national and/or international professional organizations and tertiary sources such as Clinical Pharmacology and Up-to-Date.</p>	<p>national and/or international professional organizations and tertiary sources such as Clinical Pharmacology and Up-to-Date.</p>	<ul style="list-style-type: none"> Whenever possible, practice guidelines from clinical professional organizations such as the American Medical Association or the American Psychiatric Association, are used to establish PA frequency.
<p>Data reviewed to determine UM application:</p> <ul style="list-style-type: none"> A physician-led group of clinical professionals conduct an annual review to determine which services receive or retain a PA; items reviewed include: <ul style="list-style-type: none"> Utilization Approval/denial rates 	<p>Data reviewed to determine UM application:</p> <ul style="list-style-type: none"> N/A 	<p>Data reviewed to determine UM application:</p> <ul style="list-style-type: none"> Denial/overturn rates Approval rates Number of PA and concurrent review requests Cost trends 	<p>Data reviewed to determine UM application:</p> <ul style="list-style-type: none"> Denial/overturn rates Approval rates Number of PA and concurrent review requests Cost trends 	<p>Data reviewed to determine UM application:</p> <ul style="list-style-type: none"> A physician-led group of clinical professionals conduct an annual review to determine which services receive or retain a PA; items reviewed include: <ul style="list-style-type: none"> Utilization Approval/denial rates



FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<ul style="list-style-type: none"> – Documentation/justification of services – Cost data 				<ul style="list-style-type: none"> – Documentation/justification of services – Cost data
<p>IRR standard (OHA):</p> <ul style="list-style-type: none"> • KEPRO has a formal policy including an 80% standard using InterQual criteria. <p>IRR standard (Comagine Health):</p> <ul style="list-style-type: none"> • Spot-checks performed through supervision. Formal policy to be developed. <p>IRR standard (Comagine Health):</p> <ul style="list-style-type: none"> • Spot-checks performed through supervision. 	<p>IRR standard:</p> <ul style="list-style-type: none"> • Spot-checks performed through supervision. 	<p>IRR standard:</p> <ul style="list-style-type: none"> • Inter-rater reliability testing is performed on an annual basis between reviewers to ensure consistency in the review process, 90% testing standard. 	<p>IRR standard:</p> <ul style="list-style-type: none"> • Inter-rater reliability testing is performed on an annual basis between reviewers to ensure consistency in the review process, 90% testing standard. 	<p>IRR standard (OHA):</p> <ul style="list-style-type: none"> • KEPRO has a formal policy including an 80% standard using InterQual criteria.
Analysis				
<p>UM was applied to FFS MH/SUD and M/S HCBS benefits, and CCO MH/SUD and FFS M/S OP benefits listed in comparability and stringency Standard #1. For HCBS, MH/SUD benefits were administered by the Oregon Department of Human Services (DHS) and OHA’s subcontractor, Comagine Health, while HCBS M/S benefits were administered by DHS. Pursuant to the 2020 CCO 2.0 Health Care Services Contract, the CCO did not require PA for MH/SUD services with the exception of more intensive care benefits such as ABA and psychiatric day treatment.</p>				



FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<p>HSAG’s analysis of AllCare’s PA data for IP and OP benefits did not reveal any concerns related to MHP. Of the total 21,263 IP and OP PA requests reported, 5.71 percent were denied. Only 5.62 percent of MH/SUD PA requests were denied, with one of those denials resulting in an overturned appeal.</p> <p><u>Comparability</u></p> <p>UM of MH/SUD and M/S HCBS benefits was required to meet federal HCBS requirements regarding person-centered service plans (PCSPs), providing benefits in the least restrictive environment, and applicable waiver applications/State plan amendments. Evidence for the application of UM to these benefits included federal requirements regarding PCSPs for 1915(c), 1915(i), 1915(k), and 1915(j) services and applicable approved waiver applications/State plan amendments. UM was applied to non-HCBS CCO MH/SUD, and M/S OP services were assigned UM to confirm coverage relative to the HERC PL and guidelines and federal guidelines. Non-HCBS MH/SUD services were also reviewed to ensure services were medically necessary relative to clinical practice guidelines and offered in the least restrictive environment that is safe, as required by the OPP Olmstead settlement for MH/SUD. A subset of CCO M/S OP services were also assigned UM to assure the individual’s safety. Evidence for safety issues includes HERC guidelines. HSAG determined the rationale and evidence to be comparable.</p> <p>AllCare and OHP FFS made authorization decisions within 24 hours for emergencies, 72 hours for urgent requests, and 14 days for standard requests. Providers were encouraged to submit requests for authorization sufficiently in advance to be consistent with OAR time frames. Most CCO documentation requirements for MH/SUD included an admission note and records submitted via telephone, fax, or electronically. CCO M/S was electronically notified of an admission and care was reviewed via electronic health record (EHR). Alternatively, documentation could be submitted via fax. PCSPs for both M/S and MH/SUD must be developed within 90 days. The PCSP for both MH/SUD and M/S was based on an assessment and other relevant supporting documentation. It was developed by the member, the member’s team, and the member’s case manager. Qualified individuals conducted UM applying OARs, HERC, MCG, national guidelines, and ASAM for CCO SUD. MH/SUD and M/S DHS reviewers were required to have a BA in a related field; a BA in any field plus one year of experience; an AA with two years’ experience; or three years’ experience. The CCO and Comagine required all MH/SUD and M/S denials to be made by professional peers; however, nurses could deny M/S benefits managed by OHP FFS. HSAG determined this difference to be an issue of quality rather than a parity concern. HSAG ultimately determined that the MH/SUD PA review time frames, documentation requirements, and qualification of reviewers were comparable to those applied to M/S benefits.</p> <p><u>Stringency</u></p> <p>PA and CR frequencies for both MH/SUD and M/S benefits considered benefit coverage, medical guidelines, and member need. Both the CCO and OHP FFS allowed RR for MH/SUD and M/S when providers failed to obtain authorization. Although exceptions to these time frames were allowed by both the CCO and OHP FFS, AllCare’s adherence to a 14-day time frame from the date of service allowance for the submission of retrospective authorizations was more stringent than OHA’s RR time frame of 90 days for M/S RR under benefit packages CCOE and CCOG.</p>				



FFS HCBS MH/SUD	FFS HCBS M/S	CCO MH/SUD	CCO M/S	FFS M/S
<p>MH/SUD and M/S denial decisions could be challenged through appeals and/or State fair hearing processes. Failure to obtain authorization could result in noncoverage.</p> <p>Regarding IRR, the CCO conducted regular reviews using a 90 percent testing goal, whereas the OHP FFS subcontractor, KEPRO, had an 80 percent testing standard for M/S benefit authorizations. HSAG did not determine this discrepancy to be a parity concern as the method to promote consistency was more structured for MH/SUD benefits.</p>				
<p>Outcome</p>				
<p>HSAG’s analysis determined that the rationale, documentation requirements, processes, and frequency of UM applied to OP MH/SUD benefits were comparable to those applied to OP M/S benefits; however, it was determined that the rigor with which UM was applied to MH/SUD benefits was more stringent in relation to RR for CCOE and CCOG benefit packages as detailed in the finding below.</p> <p>Parity Finding #2: For benefit packages CCOE and CCOG, AllCare’s 14-day RR time frame allowance for OP MH/SUD PAs was more stringent than the 90-day time frame allowed by OHA and its subcontractor for OP M/S benefits under CCOE and CCOG benefit packages.</p> <p>Required Action: AllCare should align its OP RR time frame allowance to be consistent with OHP FFS, allowing OP retrospective authorization requests up to 90 days from the date of service. Exceptions should still apply as determined through medical necessity.</p>				



Category III—Prior Authorization for Prescription Drug Limits

NQTL: PA for Prescription Drugs

Benefit Package: CCOA and CCOB for adults and children

Classification: Prescription Drugs

Overview: PA is required for certain MH/SUD and M/S prescription drugs, and OHA requires PA of certain MH carve-out drugs. HSAG reviewed the reasons why CCOs and OHP FFS apply PA criteria to certain MH/SUD and M/S prescription drugs, the evidence used to establish PA criteria, and the processes used by the CCOs and OHP FFS to develop and apply PA criteria. HSAG analyzed AllCare’s application of PA for prescription drug benefits based on comparability and stringency standard information provided below.

CCO MH/SUD	FFS MH Carve Out	CCO M/S
1. To which benefit is the NQTL assigned?		
<ul style="list-style-type: none"> A, F, P, S drug groups. 	<ul style="list-style-type: none"> A and F drug groups. MH carve out drugs do not have an enforceable preferred drug list. While certain higher cost-effect agents are listed as “preferred,” this is not enforced by PA. 	<ul style="list-style-type: none"> A, F, P, S drug groups.
2. Why is the NQTL assigned to these benefits?		
<ul style="list-style-type: none"> To promote appropriate and safe treatment of funded conditions and to encourage use of preferred and cost-effective agents. 	<ul style="list-style-type: none"> To promote appropriate and safe treatment of funded conditions. 	<ul style="list-style-type: none"> To promote appropriate and safe treatment of funded conditions, to encourage use of preferred and cost-effective agents.
3. What evidence supports the rationale for the assignment?		
<ul style="list-style-type: none"> Medical evidence, best practices, professional guidelines, and the FDA 	<ul style="list-style-type: none"> FDA prescribing guidelines, medical evidence, best practices, professional 	<ul style="list-style-type: none"> Medical evidence, best practices, professional guidelines, and the FDA

CCO MH/SUD	FFS MH Carve Out	CCO M/S
<p>prescribing guidelines for indication, dosing, and duration.</p>	<p>guidelines, and P&T Committee review and recommendations.</p> <ul style="list-style-type: none"> Federal and state regulations/OAR and the Prioritized List. 	<p>prescribing guidelines for indication, dosing, and duration.</p>
<p>4. What are the NQTL procedures?</p>		
<ul style="list-style-type: none"> Providers, patients, or pharmacies can make a PA request by phone, fax, or through the CCO’s provider portal. There is no required form (though one is available upon request). Most PA criteria require documentation to support medical appropriateness and FDA-approved use and dosing. All PA requests are responded to within 24 hours. The PA criteria are developed by pharmacists and in consultation with the P&T Committee. Failure to obtain PA in combination with an absence of medical necessity results in no provider reimbursement. 	<ul style="list-style-type: none"> PA requests are typically faxed to the Pharmacy Call Center, but requests can also be submitted through the online portal, by phone, or by mail. The standard PA form is one page long, except for nutritional supplement requests. Most PA criteria require clinical documentation such as chart notes. All PA requests are responded to within 24 hours. The PA criteria are developed by pharmacists in consultation with the P&T Committee. Failure to obtain PA in combination with an absence of medical necessity results in no provider reimbursement. Notice of Benefit Determination sent to both Recipient and Provider. - Denials letters include information on required criteria, denial reasons, and how the provider can appeal and member hearing rights. 	<ul style="list-style-type: none"> Providers, patients, or pharmacies can make a PA request by phone, fax, or through the CCO’s provider portal. There is no required form (though one is available upon request). Most PA criteria require documentation to support medical appropriateness and FDA-approved use and dosing. All PA requests are responded to within 24 hours. The PA criteria are developed by pharmacists and in consultation with the P&T Committee. Failure to obtain PA in combination with an absence of medical necessity results in no provider reimbursement.

CCO MH/SUD	FFS MH Carve Out	CCO M/S
5. How frequently or strictly is the NQTL applied?		
<ul style="list-style-type: none"> Typically, the frequency range is three months to a year, depending on medical appropriateness and safety, as recommended by the P&T Committee. Inter-rater reliability testing is performed on an annual basis between reviewers to ensure consistency in the review process. Providers may provide additional information for a reconsideration of a denial. Providers and members may appeal any denial; members may request a fair hearing. PA denial/approval and appeal rates are monitored by pharmacy staff and reported to the Quality Committee. PA criteria are reviewed for appropriateness on a biennial basis. 	<ul style="list-style-type: none"> The State approves PAs for up to 12 months, depending on medical appropriateness and safety, as recommended by the P&T Committee. Approximately 19% of MH/SUD drugs are subject to PA criteria for clinical reasons. The State allows providers to submit additional information for reconsideration of a denial. Providers can appeal denials on behalf of a member, and members have fair hearing rights. There were 10 client fair hearing requests for denied MH/SUD medications. None were reversed after agency reconsideration or hearing. The State assesses stringency through review of PA denial/approval and appeal rates; number of drugs requiring PA; number of PA requests; and pharmacy utilization data/reports. PA criteria are reviewed as needed due to clinical developments, literature, studies, and FDA medication approvals. 	<ul style="list-style-type: none"> Typically, the frequency range is three months to a year, depending on medical appropriateness and safety, as recommended by the P&T Committee. Inter-rater reliability testing is performed on an annual basis between reviewers to ensure consistency in the review process. Providers may provide additional information for a reconsideration of a denial. Providers and members may appeal any denial; members may request a fair hearing. PA denial/approval and appeal rates are monitored by pharmacy staff and reported to the Quality Committee. PA criteria are reviewed for appropriateness on a biennial basis.

CCO MH/SUD	FFS MH Carve Out	CCO M/S
6. What standard supports the frequency or rigor with which the NQTL is applied?		
<ul style="list-style-type: none"> Medical evidence, best practices, professional guidelines, and the FDA prescribing guidelines for indication, dosing, and duration. 	<ul style="list-style-type: none"> FDA prescribing guidelines, medical evidence, best practices, professional guidelines, and P&T Committee review and recommendations. Federal and state regulations/OAR and the Prioritized List. 	<ul style="list-style-type: none"> Medical evidence, best practices, professional guidelines, and the FDA prescribing guidelines for indication, dosing, and duration.
Analysis		
<p>AllCare applied PA criteria to MH/SUD and M/S prescription drug benefits and applied PA to certain MH/SUD and M/S drugs to promote appropriate and safe treatment, and cost-effective use of prescription drugs. Since 2018, the CCO conducted an evaluation of its formulary and made changes that either added prescription drugs, added and removed PA criteria to prescription drugs, and adjusted criteria for prescription drugs in the formulary. PA was consistent across all benefit packages (CCOA, CCOB, CCOE, and CCOG).</p>		
<p>The CCO reported a 49.80 percent denial rate for both MH/SUD and M/S prescription drug authorization requests from January 1, 2020, through June 30, 2020. During that time period, 1,524 denials were appealed, with only three denials resulting in an overturned decision. Most of the prescription drugs denied were below the funding line on the PL. The CCO reported that a total of 330 prescription drugs were subject to PA.</p>		
<u>Comparability</u>		
<p>OHP FFS applied PA to certain MH FFS carve-out drugs to promote appropriate and safe treatment. Evidence used by the CCO and OHP FFS to determine which MH/SUD and M/S drugs were subject to PA included Food and Drug Administration (FDA) prescribing guidelines, medical evidence, best practices, professional guidelines, and Pharmacy and Therapeutic (P&T) Committee review and recommendations. The PA criteria for both MH/SUD and M/S drugs were developed by pharmacists in consultation with the P&T Committee. PA requests for both MH/SUD and M/S drugs could be submitted by fax, phone, or online.</p>		
<u>Stringency</u>		
<p>For both MH/SUD and M/S drugs, most PA criteria required clinical documentation such as chart notes. Failure to obtain PA for MH/SUD and M/S drugs subject to PA in combination with an absence of medical necessity resulted in no reimbursement for the drug. Decisions were responded to within 24 hours, with decisions being made within 72 hours. For both MH/SUD and M/S drugs, the length of authorizations was dependent on medical appropriateness and safety, as recommended by the P&T Committee, based on clinical evidence such as FDA prescribing guidelines, best practices, and clinical practice guidelines. Both the CCO and OHP FFS allowed exceptions to the formulary and preferred drug</p>		



CCO MH/SUD	FFS MH Carve Out	CCO M/S
list based on medical necessity. For carve-out drugs covered by OHP FFS, the CCO stated that it works with pharmacies and providers to redirect PA requests and claims to OHP FFS.		
Outcome		
HSAG determined the processes, strategies, and evidentiary standards for PA of MH/SUD prescription drugs to be comparable and no more stringently applied, in writing and in operation, to M/S prescription drugs.		



Category IV—Provider Admission—Closed Network

NQTL: Provider Admission

Benefit Package: CCOA, CCOB, CCOE, and CCOG for adults and children

Classification: IP and OP

Overview: CCOs require providers of MH/SUD and M/S services to successfully meet credentialing and recredentialing requirements in order to be admitted to and continue to participate in the CCO’s network. HSAG analyzed AllCare’s provider admission processes based on comparability and stringency standard information related to network closures provided below. Since Medicaid provider enrollment for OHP FFS did not include a provider credentialing component, HSAG deemed provider admission processes not applicable for OHP FFS and did not include that classification in the provider admission analysis.

CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
1. To which benefit is the NQTL assigned?			
<ul style="list-style-type: none"> CCO does not close its network for new MH/SUD providers of inpatient services, due to the limited pool of providers of these services. CCO may close its network for new providers of outpatient MH/SUD services when CCO determines there is no further community need for new providers to meet service capacity and access standards. 	<ul style="list-style-type: none"> The State does not restrict new providers of inpatient or outpatient MH/SUD services from enrollment. 	<ul style="list-style-type: none"> N/A CCO may close its network for new providers of outpatient M/S services when CCO determines there is no further community need for new providers to meet service capacity and access standards. 	<ul style="list-style-type: none"> The State does not restrict new providers of inpatient or outpatient MH/SUD services from enrollment.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
2. Why is the NQTL assigned to these benefits?			
<ul style="list-style-type: none"> When CCO closes its network to new MH/SUD providers, it is done to balance the ready and timely access of members to MH/SUD services, while maintaining and assuring the integrity, safety, and quality of the network providers and facilities. The network must be cost effective and maintain the triple aim. 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> When CCO closes its network to new MH/SUD providers, it is done to balance the ready and timely access of members to MH/SUD services, while maintaining and assuring the integrity, safety, and quality of the network providers and facilities. The network must be cost effective and maintain the triple aim. 	<ul style="list-style-type: none"> N/A
3. What evidence supports the rationale for the assignment?			
<ul style="list-style-type: none"> Network sufficiency standards are required by 42 CFR 438.206. Requirements related to the selection and retention of providers are specified in 42 CFR 438.214. Requirements in 42 CFR 438.12 for the non-discrimination of provider participation states that this does not require an MCO (CCO) to contract beyond the needs of its enrollees to 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Network sufficiency standards are required by 42 CFR 438.206. Requirements related to the selection and retention of providers are specified in 42 CFR 438.214. Requirements in 42 CFR 438.12 for the non-discrimination of provider participation states that this does not require an MCO (CCO) to contract beyond the needs of its enrollees to 	<ul style="list-style-type: none"> N/A



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
maintain quality and control costs. <ul style="list-style-type: none"> State rule related to network sufficiency standards, OAR 410-141-0220. 		maintain quality and control costs. <ul style="list-style-type: none"> State rule related to network sufficiency standards, OAR 410-141-0220. 	
4. What are the NQTL procedures?			
<ul style="list-style-type: none"> CCO closes its network to new providers of outpatient MH/SUD services when CCO determines there is no further community need for new providers to meet capacity and access standards. The result of the NQTL is that the provider may not participate in the network and may not be reimbursed for services provided. CCO monitors the provider capacity report/mapping on a quarterly basis to ensure adequate geographic coverage. CCO reviews the provider capacity report by county and/or zip code, provider specialty and the number of covered lives in each county. When determining whether to close the network, the CCO 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> CO closes its network to new providers of outpatient MH/SUD services when CCO determines there is no further community need for new providers to meet capacity and access standards. The result of the NQTL is that the provider may not participate in the network and may not be reimbursed for services provided. CCO Contract manager compiles monthly report on network capacity by zip code for each specialty and providers per 1,000 members. The Contract manager makes recommendations to the Credentialing Committee to close or open the network to particular provider types. The CCO is in the process of developing a validated report 	<ul style="list-style-type: none"> N/A



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>also considers access to care complaints, timeliness of accessing care from the date of referral to first appointment, and the number of behavioral health integration sites in the community. This information is shared with the Network Capacity Committee. The Network Capacity Committee reviews this information and makes the decision about network closure.</p> <ul style="list-style-type: none"> • CCO Credentialing Committee (CCO CMO, CCO Behavioral Health Director) is responsible for the decision-making process to close the network. 		<p>to review other access to care factors in determining whether to close the network to particular provider types.</p> <ul style="list-style-type: none"> • CCO uses data and information from the Network Adequacy Report to support decisions to close the network. The CCO Credentialing Committee is responsible for the decision-making process to close the network. 	
<p>5. How frequently or strictly is the NQTL applied?</p>			
<ul style="list-style-type: none"> • When the CCO decides to close the network to particular providers/provider types, all new outpatient providers applying for those particular providers/provider types are subject to this NQTL. 	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • When the CCO decides to close the network to particular providers/provider types, all new outpatient providers applying for those particular providers/provider types are subject to this NQTL. 	<ul style="list-style-type: none"> • N/A



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<ul style="list-style-type: none"> CCO network may be closed to general mental health or substance abuse providers, but at any time a specialty provider is needed or a provided in an underserved geographic, an exception is made. 			
6. What standard supports the frequency or rigor with which the NQTL is applied?			
<ul style="list-style-type: none"> Ongoing monitoring by the CCO's provider services department of access standards and provider capacity as defined by State criteria, along with regular review of grievances or complaints from members, PCPs, or other providers 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Ongoing monitoring by the CCO's provider services department of access standards and provider capacity as defined by State criteria, along with regular review of grievances or complaints from members, PCPs, or other providers. 	<ul style="list-style-type: none"> N/A
Analysis			
<p>AllCare may close its network to OP providers of MH/SUD and M/S services when the CCO determines there is no community need for new providers to meet service capacity and access standards. Developing a network based on network adequacy and sufficiency standards is supported by federal regulation, including the ability of an MCO (CCO) to limit contracting beyond the needs of its members to maintain quality and control costs (42 CFR §438.12). OAR 410-141-0220 also requires the CCO to meet network sufficiency standards, which impacts the application of this NQTL. In addition, provider network admission limits do not apply to FFS benefits, and the application of provider network admission NQTLs for benefits delivered under managed care is supported by 42 CFR §438.206 and §438.12. Accordingly, parity was not analyzed.</p> <p>Comparability</p> <p>The closing of the CCO's network to new MH/SUD and M/S providers was done to balance the ready and timely access of members to services; maintain and assure the integrity, safety, and quality of the network providers and facilities; and maintain a network that is cost-</p>			



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>effective and meets the triple aim. Although the CCO closed its network to chiropractic and physical therapy providers in some ZIP Codes, it ultimately accepted applications for and credentialed those provider types. The CCO also reported a network closure to some mail order durable medical equipment (DME) providers to support store front DMEs in the CCO’s region. These closures did not result in impacts on provider availability or parity across MH/SUD and M/S benefits. Based on these findings, the CCO’s strategy and evidence for closing the network to OP providers when the CCO determines that it has met network adequacy and sufficiency standards were comparable for providers of both MH/SUD and M/S services.</p> <p><u>Stringency</u></p> <p>All requests for network admission of providers of MH/SUD and M/S services were reviewed for need based on the network adequacy of the current provider network. AllCare reported that when it determines particular provider types are not needed, provider requests to join the network are declined and the provider may not be reimbursed for provided services. For MH/SUD providers, monitoring included reviewing the provider capacity report/mapping quarterly to ensure adequate geographic coverage, provider capacity reports by county and/or ZIP Code, and provider specialty and the number of covered lives in each county. Access to care complaints, timeliness of accessing care from the date of referral to first appointment, and the number of behavioral health integration sites in the community were also reviewed to determine whether or not to close the network to providers.</p>			
<p>Outcome</p>			
<p>HSAG’s analysis of AllCare’s reported information resulted in the determination that the CCO’s network closure processes and decisions for MH/SUD providers were comparable to and no more stringently applied to M/S providers.</p>			



Category V—Provider Admission—Network Credentialing

NQTL: Provider Admission

Benefit Package: CCOA, CCOB, CCOE, and CCOG for adults and children

Classification: IP and OP

Overview: CCOs require providers of MH/SUD and M/S services to successfully meet credentialing and recredentialing requirements in order to be admitted to and continue to participate in the CCO’s network. HSAG analyzed AllCare’s provider admission processes based on comparability and stringency standard information related to credentialing and recredentialing provided below. Since Medicaid provider enrollment for OHP FFS did not include a provider credentialing component, HSAG deemed provider admission processes not applicable for OHP FFS and did not include that classification in the provider admission analysis.

CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
1. To which benefit is the NQTL assigned?			
<ul style="list-style-type: none"> CCO requires all participating providers to meet credentialing and re-credentialing requirements CCO does not apply provider requirements in addition to State licensing 	<ul style="list-style-type: none"> All FFS providers must be enrolled as a provider with Oregon Medicaid The State does not apply provider requirements in addition to State licensing. 	<ul style="list-style-type: none"> CCO requires all participating providers to meet credentialing and re-credentialing requirements N/A 	<ul style="list-style-type: none"> All FFS providers must be enrolled as a provider with Oregon Medicaid The State does not apply provider requirements in addition to State licensing
2. Why is the NQTL assigned to these benefits?			
<ul style="list-style-type: none"> CCO applies credentialing and re-credentialing requirements to: – Meet State and Federal requirements – Ensure capabilities of provider to deliver high 	<ul style="list-style-type: none"> Provider enrollment is required by State law and Federal regulations. The State also specifies requirements for provider enrollment in order to ensure beneficiary 	<ul style="list-style-type: none"> CCO applies credentialing and re-credentialing requirements to: – Meet State and Federal requirements – Ensure capabilities of provider to deliver high 	<ul style="list-style-type: none"> Provider enrollment is required by State law and Federal regulations. The State also specifies requirements for provider enrollment in order to ensure beneficiary

CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
quality of care – Ensure provider meets minimum competency standards.	health and safety and to reduce Medicaid provider fraud, waste, and abuse.	quality of care – Ensure provider meets minimum competency standards.	health and safety and to reduce Medicaid provider fraud, waste, and abuse.
3. What evidence supports the rationale for the assignment?			
<ul style="list-style-type: none"> • Credentialing/re-credentialing requirements are required by State law and Federal regulations, including 42 CFR 438.214. • NCQA. 	<ul style="list-style-type: none"> • Provider enrollment is required by State law and Federal regulations, including 42 CFR Part 455, Subpart E- Provider Screening and Enrollment. 	<ul style="list-style-type: none"> • Credentialing/re-credentialing requirements are required by State law and Federal regulations, including 42 CFR 438.214. • NCQA. 	<ul style="list-style-type: none"> • Provider enrollment is required by State law and Federal regulations, including 42 CFR Part 455, Subpart E- Provider Screening and Enrollment.
4. What are the NQTL procedures?			
<ul style="list-style-type: none"> • All providers must meet credentialing and re-credentialing requirements. Providers must complete and provide OPCA/OPRA (~12 pages long), formal background check, professional license, original primary source transcripts, OIG verification, copies of any certificates and continuing education additional board certification, DEA license, professional references, Medicare sanction (EPLS/SAM), Medicare opt-out (if applicable). 	<ul style="list-style-type: none"> • All providers are eligible to enroll as a provider and receive reimbursement provided they meet all relevant Federal and State licensing and other rules and are not on an exclusionary list. Providers must complete forms and documentation required for their provider type. This includes information demonstrating the provider meets provider enrollment requirements such as NPI, tax ID, disclosures, and licensure/certification. The provider enrollment forms vary from 1 to 19 pages, depending on the 	<ul style="list-style-type: none"> • All providers must meet credentialing and re-credentialing requirements. Providers must complete and provide OPCA/OPRA (~12 pages long), formal background check, professional license, original primary source transcripts, OIG verification, copies of any certificates and continuing education additional board certification, DEA license, professional references, Medicare sanction (EPLS/SAM), Medicare opt-out (if applicable). 	<ul style="list-style-type: none"> • All providers are eligible to enroll as a provider and receive reimbursement provided they meet all relevant Federal and State licensing and other rules and are not on an exclusionary list. Providers must complete forms and documentation required for their provider type. This includes information demonstrating the provider meets provider enrollment requirements such as NPI, tax ID, disclosures, and licensure/certification. The provider enrollment forms vary from 1 to 19 pages, depending on the

CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<ul style="list-style-type: none"> Providers may submit supporting documentation by fax, electronically, mail, etc. CCO’s decision-making body responsible for reviewing required information and making provider credentialing decisions is the Options credentialing committee meets as needed. The clinical director, medical director, human resource director, COO, and compliance director as needed review each application and determine if they meet the credentialing standards. A letter is then sent to the staff with the credentialing decision. NPDB query match. Look for unexplained gaps in work Hx >6 months CCO’s credentialing process averages 0-30 days depending upon completeness of application and timeliness of primary source verification documents. 	<p>provider type. Supporting documentation includes the provider’s IRS letter, licensure, SSN number, and/or Medicare enrollment as applicable to the provider type. The enrollment forms and documentation can be faxed in or completed and submitted electronically to the State’s provider enrollment unit. The State’s provider enrollment process includes checking the forms for completeness, running the provider name against exclusion databases, and verifying any licenses, certifications or equivalents. The State’s enrollment process averages 7 to 14 days. State staff in the provider enrollment unit are responsible for reviewing information and making provider enrollment decisions.</p>	<ul style="list-style-type: none"> Providers may submit supporting documentation by fax, electronically, mail, etc. CCO’s decision-making body responsible for reviewing required information and making provider credentialing decisions is the Options credentialing committee meets as needed. The clinical director, medical director, human resource director, COO, and compliance director as needed review each application and determine if they meet the credentialing standards. A letter is then sent to the staff with the credentialing decision. NPDB query match. Look for unexplained gaps in work Hx >6 months CCO’s credentialing process averages 0-30 days depending upon completeness of application and timeliness of primary source verification documents. 	<p>provider type. Supporting documentation includes the provider’s IRS letter, licensure, SSN number, and/or Medicare enrollment as applicable to the provider type. The enrollment forms and documentation can be faxed in or completed and submitted electronically to the State’s provider enrollment unit. The State’s provider enrollment process includes checking the forms for completeness, running the provider name against exclusion databases, and verifying any licenses, certifications or equivalents. The State’s enrollment process averages 7 to 14 days. State staff in the provider enrollment unit are responsible for reviewing information and making provider enrollment decisions.</p>

CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
5. How frequently or strictly is the NQTL applied?			
<ul style="list-style-type: none"> All providers/provider types are subject to credentialing re-credentialing. There are no exceptions to meeting these requirements. 	<ul style="list-style-type: none"> All providers/provider types are subject to enrollment/re-enrollment requirements. There are no exceptions to meeting provider enrollment/re-enrollment requirements. 	<ul style="list-style-type: none"> All providers/provider types are subject to credentialing re-credentialing. There are no exceptions to meeting these requirements. The CCO was not able to report the number of providers terminated as a result of re-credentialing. 	<ul style="list-style-type: none"> All providers/provider types are subject to enrollment/re-enrollment requirements. There are no exceptions to meeting provider enrollment/re-enrollment requirements.
6. What standard supports the frequency or rigor with which the NQTL is applied?			
<ul style="list-style-type: none"> Requirement to conduct credentialing for all new providers is established by State law and Federal regulation. The frequency with which CCO performs re-credentialing is based upon: – State law and Federal regulations – State contract requirements – National accreditation standards (NCQA) – Special Populations Rules (self-disclosure requirements). 	<ul style="list-style-type: none"> Provider enrollment is required by State law and Federal regulations, including 42 CFR Part 455, Subpart E - Provider Screening and Enrollment. The frequency with which the State re-enrolls providers is based on State law and Federal regulations. 	<ul style="list-style-type: none"> Requirement to conduct credentialing for all new providers is established by State law and Federal regulation. The frequency with which CCO performs re-credentialing is based upon: – State law and Federal regulations – State contract requirements – National accreditation standards (NCQA) – Special Populations Rules (self-disclosure requirements). 	<ul style="list-style-type: none"> Provider enrollment is required by State law and Federal regulations, including 42 CFR Part 455, Subpart E - Provider Screening and Enrollment. The frequency with which the State re-enrolls providers is based on State law and Federal regulations.
Analysis			
<p>All IP and OP providers of MH/SUD and M/S services were subject to CCO credentialing and recredentialing requirements. AllCare conducted credentialing and recredentialing for both providers of MH/SUD and M/S services to meet State and federal requirements, ensure providers are capable of delivering high-quality care, and ensure providers meet minimum competency standards. The CCO contractually delegated</p>			



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>credentialing and recredentialing to several organizations, such as the CMHPs, Northwest Rehab Alliance for physical and occupational therapists, PrimeCare as an independent physician association, and Providence for telehealth services among some other organizations. The CCO’s processes were the same across all benefit packages (CCOA, CCOB, CCOE, and CCOG).</p> <p>AllCare reported it had 1,685 MH/SUD and M/S providers credentialed in its network during the reporting period. Of the 128 providers seeking credentialing with the CCO, 32.03 percent (41) were unable to obtain credentialing, primarily in that applications were not accepted. Nearly half of the MH providers seeking credentialing were unable to obtain credentialing (46.67 percent), having their applications either closed due to exceeding timeframes or not accepted.</p> <p><u>Comparability</u></p> <p>AllCare required providers of MH/SUD and M/S services to successfully meet credentialing and recredentialing requirements in order to be admitted to and continue to participate in the CCO’s network. Providers were required to complete and submit a standardized credentialing application and provide supporting documentation as part of the credentialing process. Both MH/SUD and M/S providers had several methods of submitting their application and supporting documentation, including by fax, by mail, or electronically.</p> <p>The CCO’s credentialing process for MH/SUD providers included the primary source verification of licensing, board certification, Medicare Excluded Providers (Office of Inspector General), Medicare sanction (Excluded Parties List System/System for Award Management), Medicare opt-out (if applicable), and a National Practitioner Database query match to look for unexplained gaps in work history greater than six months. Nonlicensed MH care providers (e.g., qualified mental health providers/assistants and traditional health care works) were vetted similarly, with verifications completed according to qualifications and certifications related to the specific provider type. Letters documenting the credentialing decision were sent to the provider.</p> <p><u>Stringency</u></p> <p>The credentialing process for both MH/SUD and M/S providers averaged zero to 30 days depending on the completeness of the application and timeliness of primary source verification documents. The CCO’s credentialing committee was responsible for reviewing required information and making provider credentialing decisions for both MH/SUD and M/S providers. Recredentialing for both MH/SUD and M/S providers was conducted every three years, or as needed based on self-disclosure of certain kinds of incidents or background checks. Failure for MH/SUD and M/S providers to meet credentialing and recredentialing requirements results in exclusion from the CCO’s network. MH/SUD and M/S providers who are adversely affected by credentialing or recredentialing decisions may challenge the decision through an appeal process.</p> <p>HSAG’s analysis of AllCare’s reported credentialing data revealed inconclusive parity concerns across MH/SUD and M/S providers. In operation, a substantial amount of MH/SUD and M/S providers were unable to obtain credentialing, primarily related to applications not being accepted, despite the CCO publishing a quick reference guide and cover letter for providers identifying the information needed for credentialing and recredentialing. Of the 15 MH/SUD providers seeking credentialing, 46.67 percent were either closed due to application expiration or not</p>			



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>accepted. Although based on a smaller number of applications, the MH/SUD rate of providers unable to obtain credentialing was higher than the 30.09 percent denial rate for M/S providers.</p>			
<p>Outcome</p>			
<p>HSAG’s analysis found AllCare’s credentialing processes and data to be comparable in writing and in operation; however, concerns with parity were identified in the review of stringency of the CCO’s processes as identified in the finding below.</p> <p>Inconclusive Finding #1 (Inconclusive): AllCare’s overall high rates for providers unable to obtain credentialing with the CCO, and the higher percentage of 46.67 percent for MH/SUD providers in relation to the 30.09 percent of M/S providers not credentialed, resulted in an inconclusive parity determination. Although the CCO described its regular distribution of a quick reference guide and cover letter for providers identifying the information needed for credentialing and recredentialing, the data revealed applications were primarily closed due to expiration or not accepted due to missing information.</p> <p>Required Action: AllCare should assess its processing of credentialing applications, including the CCO’s efforts to work with providers to obtain or follow up with providers for necessary credentialing information, to determine any parity concerns and opportunities for improvement that could positively impact the CCO’s high rate of applications not accepted or closed.</p>			



Category VI—Out-of-Network/Out-of-State Limits

NQTL: OON and OOS limits

Benefit Package: CCOA, CCOB, CCOE, and CCOG for adults and children

Classification: IP and OP

Overview: OON/OOS services were required to provide coverage for needed MH/SUD and M/S benefits when they were not available INN or in-state. Similarly, for MH/SUD FFS benefits, OHP FFS provided OOS coverage to provide needed benefits when they were not available in-state. HSAG analyzed AllCare’s application of limits applied to OON/OOS limits based on comparability and stringency standard information provided below.

CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
1. To which benefit is the NQTL assigned?			
• OON and OOS Benefits	• OOS Benefits	• OON and OOS Benefits	• OOS Benefits
2. Why is the NQTL assigned to these benefits?			
<ul style="list-style-type: none"> • CCO seeks to maximize use of in-network providers because our provider network consists of local providers that have been credentialed and contracted with the CCO. • The purpose of providing OON/OOS coverage is to provide needed services when they are not available in-network/in-State. • The purpose of prior authorizing non-emergency 	<ul style="list-style-type: none"> • The State seeks to maximize use of in-State providers because the State has determined that they meet applicable requirements, and they have a provider agreement with the State, which includes agreement to comply with Oregon Medicaid requirements and accept DMAP rates. • The purpose of providing OOS coverage is to provide needed services when the 	<ul style="list-style-type: none"> • CCO seeks to maximize use of in-network providers because our provider network consists of local providers that have been credentialed and contracted with the CCO. • The purpose of providing OON/OOS coverage is to provide needed services when they are not available in-network. • The purpose of prior authorizing non-emergency 	<ul style="list-style-type: none"> • The State seeks to maximize use of in-State providers because the State has determined that they meet applicable requirements, and they have a provider agreement with the State, which includes agreement to comply with Oregon Medicaid requirements and accept DMAP rates. • The purpose of providing OOS coverage is to provide needed services when the

CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>OON/OOS benefits is to determine the medical necessity of the requested benefit and the availability of an in-network/in-State provider.</p>	<p>service is not available in the State of Oregon or the client is OOS and requires covered services.</p> <ul style="list-style-type: none"> The purpose of PA for non-emergency OOS services is to ensure the criteria in OAR 410-120-1180 are met. 	<p>OON/OOS benefits is to determine the medical necessity of the requested benefit and the availability of an in-network/in-State provider.</p>	<p>service is not available in the State of Oregon or the client is OOS and requires covered services.</p> <ul style="list-style-type: none"> The purpose of PA for non-emergency OOS services is to ensure the criteria in OAR 410-120-1180 are met.
<p>3. What evidence supports the rationale for the assignment?</p>			
<ul style="list-style-type: none"> The CCO covers OON/OOS benefits in accordance with Federal and State requirements, including OAR and the CCO contract. 	<ul style="list-style-type: none"> The State covers OOS benefits in accordance with OARs. 	<ul style="list-style-type: none"> The CCO covers OON/OOS benefits in accordance with Federal and State requirements, including OAR and the CCO contract. 	<ul style="list-style-type: none"> The State covers OOS benefits in accordance with OARs.
<p>4. What are the NQTL procedures?</p>			
<ul style="list-style-type: none"> Except as otherwise required by OHA, non-emergency OON/OOS services are not covered unless medically necessary services are not available within network/within the State. The CCO’s criteria for non-emergency OON/OOS coverage include children in DHS custody, member temporarily relocated (e.g., college), special needs of the member, service cannot be provided locally. 	<ul style="list-style-type: none"> Non-emergency OOS services are not covered unless the service meets the OAR criteria. The OAR criteria for OOS coverage of non-emergency services include the service is not available in the State of Oregon or the client is OOS and requires covered services. Requests for non-emergency OOS services are made through the State PA process. 	<ul style="list-style-type: none"> Except as otherwise required by OHA, non-emergency OON/OOS services are not covered unless medically necessary services are not available within network/within the State. The CCO’s criteria for non-emergency OON/OOS coverage include children in DHS custody, member temporarily relocated (e.g., college), special needs of the member, service cannot be provided locally. 	<ul style="list-style-type: none"> Non-emergency OOS services are not covered unless the service meets the OAR criteria. The OAR criteria for OOS coverage of non-emergency services include the service is not available in the State of Oregon or the client is OOS and requires covered services. Requests for non-emergency OOS services are made through the State PA process.

CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<ul style="list-style-type: none"> • Requests for non-emergency OON/OOS services are made through the prior authorization process. • The timeframe for approving or denying a non-emergency OON/OOS request is the same as for other prior authorizations (14 days for standard requests). • The CCO establishes a single case agreement (SCA) with all OON /OOS providers. • The CCO collects relevant information from the provider and establishes a SCA, which is about a page long. • The average length of time to establish a SCA is 14 days. • Only providers enrolled in Oregon Medicaid can qualify as an OON/OOS provider. • The CCO pays OON/OOS providers either the Medicaid FFS rate or a negotiated rate. 	<ul style="list-style-type: none"> • The timeframe for approving or denying a non-emergency OOS request is the same as for other PAs (14 days for standard and three business days for urgent). • OOS providers must enroll with Oregon Medicaid. • The State pays OOS providers the Medicaid FFS rate. 	<ul style="list-style-type: none"> • Requests for non-emergency OON/OOS services are made through the prior authorization process. • The timeframe for approving or denying a non-emergency OON/OOS request is the same as for other prior authorizations (14 days for standard requests). • The CCO establishes a single case agreement (SCA) with all OON/OOS providers. • The CCO collects relevant information from the provider and establishes a SCA. • The average length of time to establish a SCA is 14 days. • Only providers enrolled in Oregon Medicaid can qualify as an OON/OOS provider. • The CCO pays OON/OOS providers either the Medicaid FFS (DMAP) rate or a negotiated rate. 	<ul style="list-style-type: none"> • The timeframe for approving or denying a non-emergency OOS request is the same as for other PAs (14 days for standard and three business days for urgent). • OOS providers must enroll with Oregon Medicaid. • The State pays OOS providers the Medicaid FFS rate.
<p>5. How frequently or strictly is the NQTL applied?</p>			
<ul style="list-style-type: none"> • If a request for a non-emergency OON/OOS benefit does not meet the CCO's 	<ul style="list-style-type: none"> • If a request for a non-emergency OOS benefit does 	<ul style="list-style-type: none"> • If a request for a non-emergency OON/OOS benefit does not meet the CCO's 	<ul style="list-style-type: none"> • If a request for a non-emergency OOS benefit does



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
<p>OON/OOS criteria, it will not be prior authorized.</p> <ul style="list-style-type: none"> If a non-emergency OON/OOS benefit is not prior authorized, the service will not be covered, and payment for the service will be denied. Members/providers may appeal the denial of an OON/OOS request. The CCO measures the stringency of the application of OON/OOS requirements by reviewing provider capacity. The CCO evaluates the number of SCAs quarterly to determine whether the network should be expanded or a particular OON/OOS should be recruited to be a network provider. 	<p>not meet the OAR criteria, it will not be authorized.</p> <ul style="list-style-type: none"> If a non-emergency OOS benefit is not authorized, the service will not be covered, and payment for the service will be denied. Members/providers may appeal the denial of an OOS request. The State measures the stringency of the application of OOS requirements by reviewing OOS denial/appeal rates. 	<p>OON/OOS criteria, it will not be prior authorized.</p> <ul style="list-style-type: none"> If a non-emergency OON/OOS benefit is not prior authorized, the service will not be covered, and payment for the service will be denied. Members/providers may appeal the denial of an OON/OOS request. The CCO measures the stringency of the application of OON/OOS requirements by reviewing provider capacity. The CCO evaluates the number of SCAs quarterly to determine whether the network should be expanded or a particular OON/OOS should be recruited to be a network provider 	<p>not meet the OAR criteria, it will not be authorized.</p> <ul style="list-style-type: none"> If a non-emergency OOS benefit is not authorized, the service will not be covered, and payment for the service will be denied. Members/providers may appeal the denial of an OOS request. The State measures the stringency of the application of OOS requirements by reviewing OOS denial/appeal rates.
<p>6. What standard supports the frequency or rigor with which the NQTL is applied?</p>			
<ul style="list-style-type: none"> Federal and State requirements, including OAR and the CCO contract. 	<ul style="list-style-type: none"> The State covers OOS benefits in accordance with OAR. 	<ul style="list-style-type: none"> Federal and State requirements, including OAR and the CCO contract. 	<ul style="list-style-type: none"> The State covers OOS benefits in accordance with OAR.



CCO MH/SUD	FFS MH/SUD	CCO M/S	FFS M/S
Analysis			
<p>AllCare ensured OON/OOS coverage to provide needed MH/SUD and M/S benefits when they were not available INN or in-state. Similarly, for MH/SUD FFS benefits, OHP FFS provided OOS coverage to provide needed benefits when they were not available in-state. The same PA processes and evidentiary standards described in NQTL categories I, II, and III were applied to OOS coverage of MH/SUD and M/S benefits across all benefit packages (CCOA, CCOB, CCOE, and CCOG). AllCare established SCAs with OON providers in the absence of INN providers to ensure the provision of medically necessary services, while OHP FFS ensured OON providers were enrolled with Medicaid.</p>			
<u>Comparability</u>			
<p>For both nonemergency MH/SUD and M/S OON/OOS benefits, the CCO (and the State for FFS MH/SUD OOS benefits) requires prior authorization to determine medical necessity and to ensure no INN/in-state providers are available to provide the benefit. The same PA processes and evidentiary standards described in NQTL categories I, II, and III were applied to OOS coverage of MH/SUD and M/S requests. For OON coverage requests, the CCO would determine if an INN provider was available or work with the OON provider to establish a SCA with payment of applicable Medicaid FFS rates. This process was applied equitably to both MH/SUD and M/S providers across all benefit packages.</p>			
<u>Stringency</u>			
<p>Requests for nonemergency OON/OOS CCO MH/SUD and M/S benefits were made through the CCO’s PA process and reviewed for medical necessity and INN/in-state coverage. The PA time frames (14 days for standard requests and 72 hours for urgent requests) applied. Similarly, the State reviewed requests for nonemergency OOS MH/SUD services through its PA process, adhering to its PA time frames identified at 14 days for standard requests and 72 hours for urgent requests. The CCO described a process for handling a complex OON/OOS MH/SUD member case, identifying how it would appropriately apply the PA and SCA process to ensure benefits were provided in relation to the member’s needs. AllCare also provided an SCA template for review that identified compliant agreement information and confirmed the CCO’s processes related to its use of OON providers.</p>			
Outcome			
<p>HSAG determined the processes, strategies, and evidentiary standards for OON/OOS limits applied to MH/SUD were comparable and no more stringently applied, in writing and in operation, to M/S OON/OOS limits across all benefit packages.</p>			



Appendix C. Improvement Plan Template

AllCare CCO, Inc. MHP Improvement Plan				
Year	Finding #	Report Reference	Finding	Required Action
2020	1	Page. #		
CCO Intervention/Action Plan			Individual(s) Responsible	Proposed Completion Date
HSAG Assessment of CCO Intervention/Action				
CCO Post-Implementation Status Update				
Documentation Submitted as Evidence of Implemented Intervention/Action				
HSAG Assessment of Intervention/Action Implementation				