

# Oregon Health Authority

## 2020 Mental Health Parity Analysis Report

*for*

Yamhill Community Care Organization

*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 Yamhill Community Care Organization (YCCO).

## 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*.<sup>1-1</sup> The 2020 MHP Analysis also referenced [Oregon’s Mapping Guide](#)<sup>1-2</sup> 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. 61<sup>1-3</sup> 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                  |   |

<sup>1-1</sup> 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>.

<sup>1-2</sup> 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>.

<sup>1-3</sup> 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.

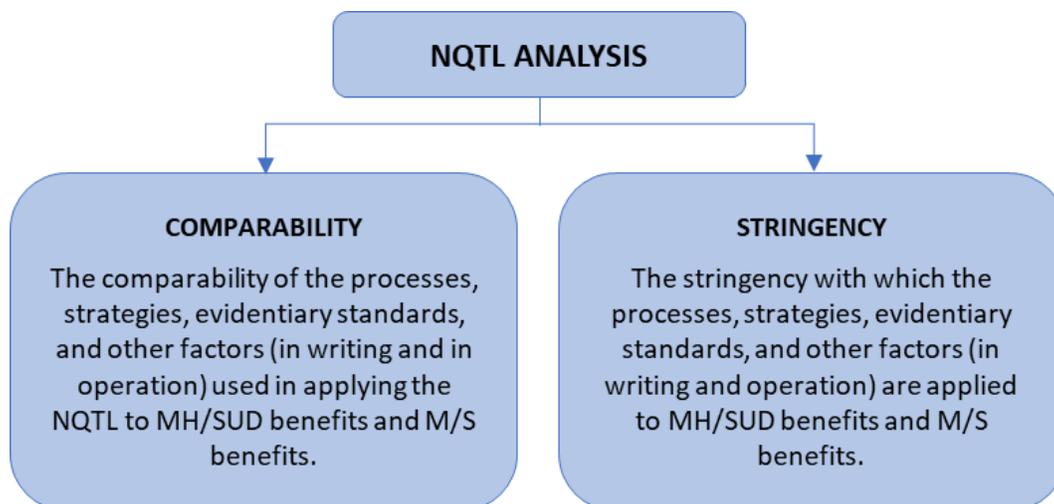
### Non-Quantitative Treatment Limitations

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 the 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><b>1. To which benefits is an NQTL assigned?</b><br/> <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><b>2. Why is the NQTL assigned to these benefits?</b><br/> <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><b>3. What evidence supports the rationale for the assignment?</b><br/> <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><b>4. What are the NQTL procedures?</b><br/> <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><b>5. How frequently or strictly is the NQTL applied?</b><br/> <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><b>6. What standard supports the frequency or rigor with which the NQTL is applied?</b><br/> <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 YCCO. 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 YCCO'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 YCCO's completed MHP questionnaire and finalized MHP reporting details by each NQTL category, respectively.

#### Overall Assessment

YCCO 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. YCCO provided MH/SUD benefits prescribed by OHA and delegated UM, prescription drug management, and credentialing functions to Providence Health Plan. HSAG evaluated YCCO's application of NQTLs to MH/SUD and M/S benefits in terms of comparability and stringency across the six NQTL categories.

Most of YCCO's policies and documentation, mostly maintained by its delegate, identified standardized processes that applied to both MH/SUD and M/S benefits, including UM decisions and timeliness requirements, over- and underutilization procedures, and standards for reviewers, among many others. 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, YCCO 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. YCCO 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. YCCO had no

time frame for RR for MH/SUD benefits and a one-year limit for M/S benefits, whereas OHP FFS applied a 90-day time frame for M/S benefits. MH/SUD and M/S denial decisions could be appealed through appeals and/or State fair hearing processes. Failure to obtain authorization could result in noncoverage. Regarding interrater reliability (IRR), the CCO conducted regular reviews using an 85 percent testing standard, whereas the OHP FFS subcontractor 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.

HSAG’s analysis of YCCO 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.

HSAG also did not identify any MHP concerns for the provider admission and OON/OOS NQTL categories based on an analysis of YCCO’s processes, strategies, and evidentiary standards. The CCO had not closed its network to MH/SUD and M/S providers and consistently applied credentialing and recredentialing processes to both MH/SUD and M/S providers. No denials were reported for MH/SUD providers seeking credentialing during the reporting period. Similarly, the same PA processes and evidentiary standards described in NQTL categories I, II, and III were applied to OON and OOS coverage of MH/SUD and M/S benefits across the benefit packages, which also resulted in parity determination across both benefit types in the respective NQTL category. While OHP FFS did not use single case agreements (SCAs) for OON providers but instead enrolled providers, the inconsistency was not identified as a parity concern as the comparison of two different processes was determined to be inapplicable for the MHP analysis.

Overall, YCCO’s application of NQTLs for MH/SUD benefits across the NQTL categories and all benefits packages was determined to be comparable to and no more stringently applied than to M/S benefits. YCCO achieved full compliance with MHP requirements, receiving no findings.

Table 3-1 presents HSAG’s overall assessment of YCCO’s compliance based on the analysis of the comparability of NQTL strategies and the stringency applied by YCCO 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     | Compliant  |
| Category II—UM Limits Applied to Outpatient Services          | Compliant     | 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     | Compliant  |
| Category VI—Out-of-Network/Out-of-State Limits                | Compliant     | Compliant  |

## Findings and Required Actions

Based on the strategy and evidence provided by YCCO, 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. Overall, YCCO’s application of NQTLs for MH/SUD benefits across the NQTL categories and all benefits packages was determined to be comparable to and no more stringently applied than to M/S benefits. YCCO achieved full compliance with MHP requirements, receiving no findings.

## Data Analysis Results

YCCO 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).

### Utilization Management for Inpatient/Outpatient Services

YCCO provided requested UM data for IP and OP services pertaining to authorization request counts and outcomes of requests. Table 3-2 presents YCCO’s counts for IP and OP PAs by benefit type, identifying the number of PA requests denied, appealed, and overturned.

**Table 3-2—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                               | 1,726            | 28                      | 1.62%                   | 1                        | 3.57%                    | 0                          | 0.00%                      |
| M/S                                  | 4,294            | 477                     | 20.75%                  | 99                       | 20.75%                   | 14                         | 2.94%                      |
| <b>Total</b>                         | <b>6,020</b>     | <b>505</b>              | <b>19.80%</b>           | <b>100</b>               | <b>19.80%</b>            | <b>14</b>                  | <b>2.77%</b>               |

**Observations**

HSAG’s analysis of YCCO’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 6,020 IP and OP PA requests reported, 19.80 percent were denied.
- Of the 28 MH/SUD PA requests denied, representing 5.54 percent of the 505 total PA denials, only one was appealed.
- Nearly 70 percent of the MH/SUD PA request denials were requests for OP benefits, which were primarily denied for a “medical necessity” categorical reason.

**Utilization Management for Prescription Drugs**

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

**Table 3-3—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 |
| 1,046  | 348                     | 33.27%                  | 2                        | 0.57%                    | 2                          | 0.57%                      |

**Observations**

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

- Of the total 1,046 prescription drug PA requests reported, 33.27 percent were denied.
- Less than 1 percent (0.57 percent) of the 348 prescription drug PA request denials were appealed, with two PA denials resulting in an overturned decision.
- The prescription drug PA request denials were primarily due to “medically necessary” and “not covered” categorical reasons.

### Enrollment/Credentialing

YCCO provided requested data pertaining to provider enrollment requests and outcomes. Table 3-4 presents YCCO’s enrollment/credentialing counts by provider type, identifying the number of terminations and denials, which includes applications not accepted.

**Table 3-4—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   | 209                       | 0                      | 0.00%        | 39                  | 1                                       | 2.56%                                   |
| M/S  | 87                        | 0                      | 0.00%        | 436                 | 0                                       | 0.00%                                   |
| <b>Total</b>                                     | <b>296</b>                | <b>0</b>               | <b>0.00%</b> | <b>475</b>          | <b>1</b>                                | <b>0.21%</b>                            |

### Observations

HSAG’s analysis of YCCO’s provider credentialing data did not reveal any parity concerns due low denial rates for both MH/SUD and M/S providers seeking credentialing during the reporting period. The following data points were observed:

- Of the 296 reported average number of providers credentialed during the reporting period, 70.61 percent were MH/SUD providers.
- There was only one reported denial for any MH/SUD providers seeking credentialing during the reporting period.

### Additional Requirement Results

HSAG requested information from YCCO 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. YCCO described the CCO’s policies on notices of adverse benefit determination (NOABDs) and how the notices describe denial reasons for members. The CCO additionally provided two NOABD templates representing MH/SUD and M/S denials, confirming that denial reasons inclusive of medical necessity determinations were made available to members. A review of YCCO’s website showed that the CCO had resources available on its website for members that included information on MH benefits available, a prescription drug formulary, and clinical practice guidelines. HSAG determined that YCCO 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, YCCO 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@dhsosha.state.or.us](mailto:CCO.MCodeliverableReports@dhsosha.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](mailto:misavoran@hsag.com)  
503.839.9070

Barb McConnell, Executive Director  
[bmccconnell@hsag.com](mailto:bmccconnell@hsag.com)  
303.717.2105

## Appendix A. MHP Evaluation Questionnaire

YCCO 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.)?<br><i>Documentation Required: Provide contractual requirements (e.g., scope of work) for delegated administrative functions.</i> | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No |
| 2.  | Did the CCO add or exclude any specific classifications of drugs from its formulary?  | <input checked="" type="checkbox"/> Yes<br><input 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<br><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 checked="" type="checkbox"/> Yes<br><input 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<br><input type="checkbox"/> No |
| 4.  | Did the CCO change timelines for authorization requests for MH/SUD or M/S benefits?   | <input type="checkbox"/> Yes<br><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<br><input checked="" type="checkbox"/> No |
| 6.  | Did the CCO change qualifications for reviewers that can authorize or deny requests?  | <input type="checkbox"/> Yes<br><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 type="checkbox"/> Yes<br><input checked="" 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<br><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<br><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<br><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 checked="" type="checkbox"/> Yes<br><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<br><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<br><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 checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No |

|   |   |  |
|---|---|--|
|   | <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> |  |
| 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<br><input checked="" type="checkbox"/> No |
| <b>Out-of-Network/Out-of-State Limit Changes in CCO—MH Parity Analysis Section VI</b> |   |  |
| <b>Question</b>   |   | <b>Yes/No</b>  |
| 1.  | Did the CCO change processes for <u>accessing</u> OON/OOS coverage for MH/SUD or M/S benefits?<br><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<br><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<br><input checked="" type="checkbox"/> No |

## Appendix B. Finalized MHP NQTL Reporting Tables

YCCO 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 areas of NQTLs 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   |
|---|---|--|---|
| <b>1. To which benefit is the NQTL assigned?</b>  |   |  |   |
| <ul style="list-style-type: none"> <li>(1, 2, 3) PA and CR are required for planned non-emergency admissions to acute IP (in and out-of-network (OON)), PRTS and subacute.</li> <li>(1, 2, 3) Emergency admissions require notification within 24-72 hours of admission and subsequent CR.</li> <li>(1, 2, 3) Extra-contractual and experimental/investigational/unproven benefit requests (i.e., exceptions) are submitted through a PA-like process.</li> </ul> | <ul style="list-style-type: none"> <li>(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).</li> <li>(2, 4) A level-of-care review is required for SCIP, SAIP and subacute care that is conducted by an OHA designee.</li> <li>(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.</li> <li>(1, 2, 4) CR Comagine RR for SCIP and SAIP are performed by Comagine.</li> </ul> | <ul style="list-style-type: none"> <li>1, 2, 3) PA and CR are required for planned non-emergency admissions to IP hospital, (in and OON) and IP hospice/palliative care.</li> <li>(1, 2, 3) Emergency admissions require notification within 24-72 hours of admission and subsequent CR.</li> <li>(1, 2, 3) Skilled nursing facility benefits (first 20 days) require PA.</li> <li>(1, 2, 3) Extra-contractual and experimental/investigational/unproven benefit requests (i.e., exceptions) are submitted through a PA-like process.</li> </ul> | <ul style="list-style-type: none"> <li>(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.)</li> <li>(1, 2, 4) PA, CR and RR for Behavior Rehabilitation Services (BRS) are performed by OHA, DHS or OYA designee.</li> <li>(1, 2, 4) PA and CR of skilled nursing facility (SNF) services.</li> <li>(1, 4) Requests for extra-contractual and experimental/investigati</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD  | CCO M/S   | FFS M/S   |
|--|---|---|---|
|  | <ul style="list-style-type: none"> <li>(1, 2, 4) CR and RR for subacute care are conducted by Comagine.</li> <li>(1, 2, 4) PA, inclusive of a Certificate of Need (CONS) process, and CR, is conducted by Comagine for PRTS.</li> <li>(1, 2, 4) PA, CR for AFH, SRTF, SRTH, YAP, RTF, and RTH are performed by Comagine.</li> </ul>   |   | <p>onal /unproven benefits (i.e., exceptions) are submitted through a PA-like process.</p>  |
| <p><b>2. Why is the NQTL assigned to these benefits?</b></p>   |   |   |   |
| <ul style="list-style-type: none"> <li>(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).</li> <li>(2) Ensure appropriate treatment in the least restrictive environment that maintains the safety of the individual. (3) To comply with federal and State requirements.</li> </ul> | <ul style="list-style-type: none"> <li>(1) UM is assigned to ensure medical necessity of services and prevent overutilization.</li> <li>(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</li> </ul> | <ul style="list-style-type: none"> <li>(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).</li> <li>(2) Ensure appropriate treatment in the least restrictive environment that maintains the safety of the individual.</li> <li>(3) To comply with federal and State requirements.</li> </ul> | <ul style="list-style-type: none"> <li>(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).</li> <li>(2) Ensure appropriate treatment in the least restrictive environment that maintains the safety of the individual.</li> </ul> |

| CCO MH/SUD  | FFS MH/SUD  | CCO M/S   | FFS M/S  |
|---|---|---|--|
|   | <p>Service Plan and IBL – Individually-Based Limitations).</p> <ul style="list-style-type: none"> <li>(4) To comply with federal and State requirements.</li> </ul>   |   | <ul style="list-style-type: none"> <li>(4) To comply with federal and State requirements.</li> </ul>   |
| <p><b>3. What evidence supports the rationale for the assignment?</b></p>   |   |   |  |
| <ul style="list-style-type: none"> <li>(1, 2, 3) HERC PL and guidelines.</li> <li>(1) UM and claims reports are reviewed for trends in overutilization. Changed UM review approach in 2017 from a risk-based target report to reviewing ALOS and cost of care per episode, with identification of outliers, which may require more frequent review or care coordination.</li> <li>(1) Annual cost and utilization reports that confirm IP as a cost driver based on percentage of spend.</li> <li>(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 &amp; Nelson, K., A Review of Economic Evaluations</li> </ul> | <ul style="list-style-type: none"> <li>(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</li> </ul> | <ul style="list-style-type: none"> <li>(1, 2, 3) HERC PL and guidelines.</li> <li>(1) UM and claims reports are reviewed for trends in overutilization on a quarterly basis</li> <li>(1) Annual cost and utilization reports that confirm IP as a cost driver based on percentage of spend.</li> <li>(2) Medical errors in the hospital are the third leading cause of death in the US. Makary, M. &amp; Daniel, M. Medical Error - The Third Leading Cause of Death in the US, BMJ, 2016;353:i2139.</li> <li>(3) Applicable federal and State requirements.</li> </ul> | <ul style="list-style-type: none"> <li>(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.</li> <li>(1) InterQual</li> <li>(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</li> </ul> |

| CCO MH/SUD  | FFS MH/SUD  | CCO M/S | FFS M/S  |
|---|---|---------|--|
| <p>of Community Mental Health Care, Sage Journals, Oct. 1, 2005, 1-13. Accessed May 25, 2018. <a href="http://journals.sagepub.com/doi/10.1177/1077558705279307">http://journals.sagepub.com/doi/10.1177/1077558705279307</a></p> <ul style="list-style-type: none"> <li>(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.</li> <li>(3) Applicable federal and State requirements.</li> </ul> | <p>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 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"> <li>(1) InterQual.</li> </ul> |         | <p>the health analytics team to analyze and evaluate adjustments to PA or CR.</p> <ul style="list-style-type: none"> <li>(1) Health analytics reports. The health analytics team and policy analysts refer services that have been identified to have increasing utilization to the UM team for evaluation.</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD  | CCO M/S   | FFS M/S   |
|--|---|---|---|
| <p><b>4. What are the NQTL procedures?</b></p>   |   |   |   |
| <p><b>Timeline for authorizations:</b></p> <ul style="list-style-type: none"> <li>Emergency requests are processed within the same business day. Urgent requests are processed within 24-72 hours. Standard requests are to be processed within 14 days.</li> <li>The CCO makes a determination and notifies the provider orally within 2 business days of receipt of complete clinical information.</li> <li>The CCO concurrently sends written notice of the decision through the portal.</li> </ul> | <p><b>Timelines for gender reassignment surgery authorizations: (OHA)</b></p> <ul style="list-style-type: none"> <li>Standard requests are to be processed within 14 days.</li> </ul> <p><b>Timelines for child residential authorizations: (OHA)</b></p> <ul style="list-style-type: none"> <li>OHA provides the initial authorization (level-of-care review) within three days of receiving complete requests for SCIP, SAIP or subacute.</li> </ul> <p><b>(Comagine)</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> | <p><b>Timeline for authorizations:</b></p> <ul style="list-style-type: none"> <li>Emergency requests are processed within same business day. Urgent requests are processed within 72 hours. Standard requests are to be processed within 14 days.</li> <li>The CCO makes a determination and notifies the provider orally within 2 business days of receipt of complete clinical information.</li> <li>The CCO mails written notice of the decision within 2 business days after it is made.</li> </ul> | <p><b>Timelines for authorizations:</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>PA is required before admission.</li> <li>OARs require emergency requests be processed within one business day, urgent requests within three business days and standard requests within 14 days.</li> </ul> |

| CCO MH/SUD  | FFS MH/SUD   | CCO M/S   | FFS M/S   |
|---|--|---|---|
|   | <p><b>Timelines for adult residential and YAP authorizations: (Comagine Health)</b></p> <ul style="list-style-type: none"> <li>Emergency requests are processed within one business day, urgent within two business days, and standard requests within 10 business days.</li> </ul>  |   |   |
| <p><b>Documentation requirements:</b></p> <ul style="list-style-type: none"> <li>Documentation requirements include a standard form used for all services, typically one page via provider portal, along with relevant medical records to support requested service.</li> </ul> | <p><b>Documentation requirements (OHA):</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>The documentation requirement for level-of-care assessment for SCIP, SAIP and subacute is a psychiatric evaluation. Other</li> </ul> | <p><b>Documentation requirements:</b></p> <ul style="list-style-type: none"> <li>Documentation requirements include a standard form used for all services, typically one page via provider portal, along with relevant medical records to support requested service.</li> </ul> | <p><b>Documentation requirements:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> |



| CCO MH/SUD | FFS MH/SUD  | CCO M/S | FFS M/S |
|------------|---|---------|---------|
|            | <p>information may be reviewed when available.</p> <p><b>Documentation requirements for PRTEF CONS and CR for PRTEF, SCIP and SAIP (Comagine):</b></p> <ul style="list-style-type: none"> <li>• PRTS CONS requires documentation that supports the justification for child residential services, including:               <ul style="list-style-type: none"> <li>– A cover sheet detailing relevant provider and recipient</li> <li>– Medicaid numbers;</li> <li>– Requested dates of service;</li> <li>– HCPCS or CPT Procedure code requested; and</li> <li>– Amount of service or units requested;</li> <li>– A behavioral health assessment and service plan meeting the requirements described in OAR 309-019-0135 through 0140; or</li> </ul> </li> </ul> |         |         |



| CCO MH/SUD | FFS MH/SUD   | CCO M/S | FFS M/S |
|------------|--|---------|---------|
|            | <ul style="list-style-type: none"> <li>- Any additional supporting clinical information supporting medical justification for the services requested;</li> <li>- For substance use disorder services (SUD), the Division uses the American Society of Addiction Medicine (ASAM) Patient Placement Criteria second edition-revised (PPC-2R) to determine the appropriate level of SUD treatment of care.</li> <li>• There are no specific documentation requirements for CR of PRTS, SCIP or SAIP.</li> </ul> <p><b>Documentation requirements (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>• Documentation may include assessment, service plan, plan-of-care, Level-of-Care Utilization System</li> </ul> |         |         |

| CCO MH/SUD  | FFS MH/SUD   | CCO M/S   | FFS M/S  |
|---|--|---|--|
|   | (LOCUS), Level of Service Inventory (LSI), PCSP, IBL, or other relevant documentation.   |   |  |
| <p><b>Method of document submission:</b></p> <ul style="list-style-type: none"> <li>Provider portal, plus information submitted via fax or telephonically.</li> </ul> | <p><b>Method of document submission (OHA):</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul> <p><b>Method of document submission (Comagine):</b></p> <ul style="list-style-type: none"> <li>Packets are submitted to Comagine by mail, fax, email or web portal for review for child residential services.</li> </ul> | <p><b>Method of document submission:</b></p> <ul style="list-style-type: none"> <li>Provider portal, plus information submitted via fax or telephonically.</li> </ul> | <p><b>Method of document submission:</b></p> <ul style="list-style-type: none"> <li>Paper (fax) or online PA requests are submitted prior to the delivery of services for which PA is required.</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD   | CCO M/S   | FFS M/S  |
|--|--|---|--|
|  | <p>Telephonic clarification may be obtained.</p> <ul style="list-style-type: none"> <li>Psychitrist to psychiatrist review is telephonic.</li> </ul> <p><b>Method of document submission (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> |   |  |
| <p><b>Qualifications of reviewers:</b></p> <ul style="list-style-type: none"> <li>LPC, CADAC and a dually certified professional review requests relative to ASAM criteria, HERC guidelines and notes and OAR.</li> <li>A crisis screener (CAT) evaluates an individual face-to-face and provides information to the hospital, who calls for PA. The basic criterion is danger to self, danger to others, or inability to care for self-due to a mental</li> </ul> | <p><b>Qualifications of reviewers (OHA):</b></p> <ul style="list-style-type: none"> <li>OHA M/S staff conduct PA and CR (if applicable) for gender reassignment surgery.</li> <li>The OHA designee is a licensed, master’s-prepared therapist that reviews psychiatric evaluations to approve or deny the level-of-care requested. Psychiatric</li> </ul>  | <p><b>Qualifications of reviewers:</b></p> <ul style="list-style-type: none"> <li>Registered nurses gather relevant clinical information from the provider and conduct medical necessity review relative to InterQual criteria, HERC guidelines and notes and OAR.</li> <li>If unable to determine medical necessity, the clinical information is forwarded to a physician for review.</li> </ul> | <p><b>Qualifications of reviewers:</b></p> <ul style="list-style-type: none"> <li>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).</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD   | CCO M/S | FFS M/S |
|--|--|---------|---------|
| <p>illness or suspected mental disorder.</p> <ul style="list-style-type: none"> <li>• Potential denials/ambiguous decisions referred to physicians for review.</li> <li>• Dually credentialed professionals can deny in consultation with the medical director.</li> </ul> | <p>consultation is available if needed.</p> <p><b>Qualifications of reviewers (Comagine):</b></p> <ul style="list-style-type: none"> <li>• Two reviewers with QMHP designation make residential authorization decisions.</li> <li>• Two psychiatrists make CONS determinations.</li> </ul> <p><b>Qualifications of reviewers (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>• 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 health services and criminal justice contacts, assessing family, cultural, social and work relationships, and conducting/reviewing a mental status examination, complete a</li> </ul> |         |         |

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

| CCO MH/SUD  | FFS MH/SUD  | CCO M/S  | FFS M/S   |
|---|---|--|---|
| <p><b>Criteria:</b></p> <ul style="list-style-type: none"> <li>ASAM criteria, HERC guidelines and notes, OAR and ASAM.</li> <li>YCCO uses its own BH level-of-care criteria that was adapted from Health Share of Oregon Regional Mental Health – Child and Family Utilization Management Guidelines as well as Carlsbad Mental Health Center’s Benefit Package for Adult Services. The level of care model relies on a research-backed outcomes measurement tool, the Daily Living Activities-20—endorsed by MTM Services and the National Council for Behavioral Health—which measures the daily living areas impacted by mental illness or disability. The DLA-20 supports the functional assessment data needs of service providers. Additionally, the Global Assessment of Functioning (GAF) and Children’s Global Assessment Scale (CGAS) are also used within these criteria to help indicate a member’s needed level-of-care. The final version of the criteria was developed by a</li> </ul> | <p><b>Criteria (OHA):</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>OHA delegates review requests relative to least restrictive environment requirement.</li> </ul> <p><b>Criteria (Comagine):</b></p> <ul style="list-style-type: none"> <li>HERC PL, InterQual, and Comagine policy are used for residential CR.</li> </ul> <p><b>Criteria (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>QMHPs review information submitted by providers relative to State plan and OAR requirements and develop a PCSP.</li> </ul> | <p><b>Criteria:</b></p> <ul style="list-style-type: none"> <li>See above (InterQual criteria, HERC guidelines and notes and OAR).</li> </ul> | <p><b>Criteria:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> |



| CCO MH/SUD  | FFS MH/SUD  | CCO M/S  | FFS M/S  |
|---|---|--|--|
| <p>consortium of local MH participating providers within Yamhill CCO’s catchment area and formally approved by Behavioral Health Quality Management</p> <ul style="list-style-type: none"> <li>Committee. Regular review of the LOC model is a part of the BHQMC bylaws.</li> </ul> | <ul style="list-style-type: none"> <li>The PCSP components are entered into MMIS as an authorization.</li> </ul>  |  |  |
| <p><b>Reconsideration/RR:</b></p> <ul style="list-style-type: none"> <li>RR accepted, no timeframe applied.</li> </ul>  | <p><b>Retrospective Review:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Reconsideration (OHA):</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> | <p><b>Reconsideration/RR:</b></p> <ul style="list-style-type: none"> <li>RR accepted, no timeframe applied.</li> </ul> | <p><b>Retrospective Review:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Reconsideration:</b></p> <ul style="list-style-type: none"> <li>A provider may request review of a denial decision. The review occurs in weekly MMC meetings.</li> <li>Exception requests for experimental and other non-covered benefits</li> </ul> |

| CCO MH/SUD | FFS MH/SUD   | CCO M/S | FFS M/S   |
|------------|--|---------|---|
|            | <ul style="list-style-type: none"> <li>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.</li> <li>If a provider requests review of an OHA delegate level-of-care determination, KEPRO may conduct the second review.</li> </ul> <p><b>Reconsideration (Comagine):</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>No policy for CR denials.</li> </ul> <p><b>Reconsideration (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>Within 10 days of a denial, the provider may send additional</li> </ul> |         | <p>may be granted at the discretion of the MMC, which is led by the OHA’s medical director.</p> |

| CCO MH/SUD   | FFS MH/SUD  | CCO M/S   | FFS M/S   |
|--|---|---|---|
|  | <p>documentation to Comagine Health for reconsideration.</p> <ul style="list-style-type: none"> <li>A provider may request review of a denial decision, which occurs in weekly MMC meetings or Comagine Health’s own comparable medical management meeting.</li> </ul>  |   |   |
| <p><b>Appeals:</b></p> <ul style="list-style-type: none"> <li>Appeal processes are applicable.</li> </ul>  | <p><b>Appeals (OHA):</b></p> <ul style="list-style-type: none"> <li>Members may request a hearing on any denial decision.</li> </ul> <p><b>Appeals (Comagine):</b></p> <ul style="list-style-type: none"> <li>Members may request a hearing on any denial decision.</li> </ul> <p><b>Appeals (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>Members may request a hearing on any denial decision.</li> </ul> | <p><b>Appeals:</b></p> <ul style="list-style-type: none"> <li>Appeal processes are applicable.</li> </ul>   | <p><b>Appeals:</b></p> <ul style="list-style-type: none"> <li>Standard appeal and fair hearing rights apply.</li> </ul>   |
| <p><b>Consequences for failure to authorize:</b></p> <ul style="list-style-type: none"> <li>Failure to obtain authorization may result in non-payment.</li> <li>If the UM specialist does not believe hospitalization is warranted, will look for</li> </ul> | <p><b>Consequences for failure to authorize (OHA):</b></p> <ul style="list-style-type: none"> <li>Failure to obtain authorization for non-residential MH/SUD services can result in</li> </ul>  | <p><b>Consequences for failure to authorize:</b></p> <ul style="list-style-type: none"> <li>Failure to obtain authorization may result in non-payment.</li> </ul> | <p><b>Consequences for failure to authorize:</b></p> <ul style="list-style-type: none"> <li>Failure to obtain authorization can result in non-payment for benefits for which it is required.</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD  | CCO M/S  | FFS M/S  |
|--|---|--|--|
| <p>alternatives such as Bridges respite, crisis associate, or family supports.</p> | <p>non-payment for benefits for which it is required.</p> <ul style="list-style-type: none"> <li>Failure to obtain notification for non-residential MH/SUD services does not result in a financial penalty.</li> <li>For SCIP, SAIP and subacute, if coverage is retroactively denied, general funds will be used to cover the cost of care.</li> </ul> <p><b>Consequences for failure to authorize (Comagine):</b></p> <ul style="list-style-type: none"> <li>Non-coverage.</li> </ul> <p><b>Consequences for failure to authorize (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>Failure to obtain authorization can result in non-payment for benefits for which it is required.</li> </ul> |  | <ul style="list-style-type: none"> <li>Failure to obtain notification does not result in a financial penalty.</li> </ul> |
| <p><b>5. How frequently or strictly is the NQTL applied?</b></p>                   |   |  |  |
| <p><b>Frequency of review (and method of payment):</b></p>                         | <p><b>Frequency of review (and method of payment) (OHA):</b></p>  | <p><b>Frequency of review (and method of payment):</b></p> <ul style="list-style-type: none"> <li>One hospital is a DRG hospital and one is per diem.</li> </ul> | <p><b>Frequency of review (and method of payment):</b></p>   |

| CCO MH/SUD   | FFS MH/SUD   | CCO M/S  | FFS M/S   |
|--|--|--|---|
| <ul style="list-style-type: none"> <li>Providers are paid on a per diem basis, although working on a DRG contract with the largest.</li> <li>Authorization lengths are individualized by condition.</li> <li>On average, UR occurs every 3-7 days for adults.</li> <li>Utilization review required every 7 days for youth (i.e., subacute and PRTS). The frequency is tied to the collaborative relationship between the UM and wraparound team working to collectively assure the individual is in the least restrictive environment. SUD residential is authorized every 30 days, but reviewed every 14 days to assure progress consistent with goals and allow proactive intervention.</li> </ul> | <ul style="list-style-type: none"> <li>Gender reassignment surgery is authorized as a procedure.</li> <li>The initial authorization for SCIP, SAIP, and subacute is 30 days.</li> </ul> <p><b>Frequency of review (and method of payment) (Comagine):</b></p> <ul style="list-style-type: none"> <li>Child residential services are paid by per diem.</li> <li>Child residential services authorizations are conducted every 30-90 days.</li> </ul> <p><b>Frequency of review (and method of payment) (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> | <ul style="list-style-type: none"> <li>Critical Access Hospitals are paid a percentage of billed charges.</li> <li>LTACs are paid via IPPS pricing.</li> <li>Per diem IP authorizations range from 1-3 days.</li> <li>DRG reviews are conducted at the time of admission and are generally in force for the duration of the inpatient stay. No CR is conducted.</li> <li>CR is conducted within 24-48 hours of request.</li> <li>The full 20 day SNF benefit is authorized during PA.</li> </ul> | <ul style="list-style-type: none"> <li>Most IP claims are paid DRG; as a result, CR is infrequently used.</li> <li>CR is conducted monthly for LTAC and rehabilitation.</li> <li>The State conducts CR for SNF at a frequency that is determined by the care manager, but not less than one time a year.</li> <li>Authorization lengths are individualized by condition and are valid for up to a year.</li> <li>Procedural authorizations are valid for three months.</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD   | CCO M/S   | FFS M/S   |
|--|--|---|---|
| <p><b>RR conditions and timelines:</b></p> <ul style="list-style-type: none"> <li>If providers fail to obtain authorization in advance, the CCO has an exception process that allows the provider to submit the medical record for a RR of medical necessity consistent with timely claims filing guidelines. If care is deemed medically necessary, coverage is provided (up to one year).</li> </ul> | <p><b>Retrospective Review:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Reconsideration (OHA):</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>If a provider requests review of an OHA delegate level-of-care</li> </ul> | <p><b>RR conditions and timelines:</b></p> <ul style="list-style-type: none"> <li>RR accepted, no timeframe applied.</li> </ul> | <p><b>Retrospective Review:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Reconsideration:</b></p> <ul style="list-style-type: none"> <li>A provider may request review of a denial decision. The review occurs in weekly MMC meetings.</li> <li>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.</li> </ul> |

| CCO MH/SUD | FFS MH/SUD   | CCO M/S | FFS M/S |
|------------|--|---------|---------|
|            | <p>determination, KEPRO may conduct the second review.</p> <p><b>Reconsideration (Comagine):</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• No policy for CR denials.</li> </ul> <p><b>Reconsideration (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>• Within 10 days of a denial, the provider may send additional documentation to Comagine Health for reconsideration.</li> <li>• A provider may request review of a denial decision, which occurs in weekly MMC meetings or Comagine Health’s own comparable medical management meeting.</li> </ul> |         |         |



| CCO MH/SUD  | FFS MH/SUD   | CCO M/S  | FFS M/S   |
|---|--|--|---|
| <p><b>Methods to promote consistent application of criteria:</b></p> <ul style="list-style-type: none"> <li>Samples of authorization decisions are reviewed during weekly team meetings.</li> </ul> | <p><b>Methods to promote consistent application of criteria (OHA):</b></p> <ul style="list-style-type: none"> <li>Nurses are trained on the application of the HERC PL and guidelines, which is spot-checked through ongoing supervision. 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 non-residential MH/SUD services.</li> <li>There are only two OHA designee reviewers for level-of-care review for SCIP, SAIP, and subacute and no specific criteria, so N/A.</li> </ul> <p><b>Methods to promote consistent application of criteria (Comagine):</b></p> <ul style="list-style-type: none"> <li>Parallel chart reviews for the two reviewers. (No criteria.)</li> </ul> | <p><b>Methods to promote consistent application of criteria:</b></p> <ul style="list-style-type: none"> <li>Annually, the CCO reviews 5 cases per reviewer to assess criteria application with a standard of 80%.</li> </ul> | <p><b>Methods to promote consistent application of criteria:</b></p> <ul style="list-style-type: none"> <li>Nurses are trained on the application of the HERC PL and guidelines, which is spot-checked through ongoing supervision. 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.</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD  | CCO M/S  | FFS M/S   |
|--|---|--|---|
|  | <p><b>Methods to promote consistent application of criteria (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>• Monthly clinical team meetings in which randomly audited charts are reviewed/discussed by peers using Comagine Health compliance department-approved audit tool.</li> <li>• Results of the audit are compared, shared and discussed by the team and submitted to Compliance Department monthly for review and documentation.</li> <li>• Individual feedback is provided to each clinician during supervision on their authorization as well as plan-of-care reviews.</li> </ul> |  |   |
| <p><b>6. What standard supports the frequency or rigor with which the NQTL is applied?</b></p>   |   |  |   |
| <p><b>Evidence for UM frequency:</b></p> <ul style="list-style-type: none"> <li>• Authorization lengths correlate with expected lengths of stay and expectations for improvement based on CCO’s regional UM</li> </ul> | <p><b>Evidence for UM frequency (OHA (and designee for level-of-care review), Comagine and KEPRO):</b></p>  | <p><b>Evidence for UM frequency:</b></p> <ul style="list-style-type: none"> <li>• Authorization lengths correlate expected lengths of stay based on InterQual, HERC or the DRG.</li> </ul> | <p><b>Evidence for UM frequency:</b></p> <ul style="list-style-type: none"> <li>• PA length and CR frequency are tied to HERC PL and</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD  | CCO M/S  | FFS M/S  |
|--|---|--|--|
| <p>guidelines, ASAM, HERC, and DSM.</p>  | <ul style="list-style-type: none"> <li>PA length and CR frequency are tied to HERC PL and guidelines, OAR, CFRs, InterQual, reviewer expertise and timelines for expectations of improvement.</li> </ul>  |  | <p>guidelines, DRGs, OAR, CFRs, InterQual, reviewer expertise and timelines for expectations of improvement.</p>   |
| <p><b>Data reviewed to determine UM application:</b></p> <ul style="list-style-type: none"> <li>Data reviewed for stringency include denial and appeal rates. Monitored through various sources including monthly Appeal Review meetings, which are attended by Appeal Department RNs, Medical Directors and Managers of both Benefit Management and Appeals.</li> <li>Results of hearings- can alert plan to need to review denials later overturned by judge.</li> </ul> | <p><b>Data reviewed to determine UM application:</b></p> <ul style="list-style-type: none"> <li>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.).</li> </ul> <p><b>Data reviewed to determine UM application (Comagine):</b></p> <ul style="list-style-type: none"> <li>N/A</li> </ul> <p><b>Data reviewed to determine UM application (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>N/A</li> </ul> | <p><b>Data reviewed to determine UM application:</b></p> <ul style="list-style-type: none"> <li>Data reviewed for stringency include IRR measures, denial and appeal rates. Monitored through various sources including monthly Appeal Review meetings, which are attended by Appeal Department RNs, Medical Directors and Managers of both Benefit Management and Appeals.</li> <li>Results of hearings- can alert plan to need to review denials later overturned by judge.</li> </ul> | <p><b>Data reviewed to determine UM application:</b></p> <ul style="list-style-type: none"> <li>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"> <li>Utilization.</li> <li>Approval/denial rates.</li> <li>Documentation/justification of services.</li> <li>Cost data.</li> </ul> </li> </ul> |

| CCO MH/SUD  | FFS MH/SUD   | CCO M/S   | FFS M/S   |
|---|--|---|---|
| <p><b>IRR standard:</b></p> <ul style="list-style-type: none"> <li>Reviews conducted annually, 85% standard.</li> </ul>   | <p><b>IRR standard (OHA):</b></p> <ul style="list-style-type: none"> <li>KEPRO has a formal policy including an 80% standard using InterQual criteria, conducting reviews at least annually.</li> </ul> <p><b>IRR standard (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>Spot-checks performed through supervision. Formal policy to be developed.</li> </ul> <p><b>IRR standard (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>Spot-checks performed through supervision.</li> </ul> | <p><b>IRR standard:</b></p> <ul style="list-style-type: none"> <li>Reviews conducted annually, 85% standard.</li> </ul> | <p><b>IRR standard (OHA):</b></p> <ul style="list-style-type: none"> <li>KEPRO has a formal policy including an 80% standard using InterQual criteria, conducting reviews at least annually.</li> </ul> |
| <p><b>Analysis</b></p>  |  |   |   |
| <p>YCCO 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 Programs [SCIP], Secure Adolescent Inpatient 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.</p> |  |   |   |



| CCO MH/SUD  | FFS MH/SUD | CCO M/S | FFS M/S |
|---|------------|---------|---------|
| <p>HSAG’s analysis of YCCO’s PA data for IP and OP benefits did not reveal any concerns related to MHP. Of the total 6,020 IP and OP PA requests reported, 19.80 percent were denied. Of the 28 MH/SUD PA requests denied, representing 5.54 percent of the 505 total PA denials, only one was appealed. Approximately 27 percent of the MH/SUD PA request denials were requests for IP benefits, which were primarily denied for a “medical necessity” categorical reason.</p> <p><b><u>Comparability</u></b></p> <p>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.</p> <p>Emergency MH/SUD and M/S IP hospital admissions required notification within 24–72 hours, with child emergency residential admissions separately requiring notification within 14 days. Most CCO documentation requirements for MH/SUD included 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 YCCO 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><b><u>Stringency</u></b></p> <p>Qualified individuals conducted UM applying OARs, HERC, MCG, national guidelines, and ASAM for CCO SUD. The CCO and OHA subcontractors required all MH/SUD and M/S denials to be made by physicians and professional peers; however, 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 (a licensed MH professional), 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. YCCO had no time frame for RR for MH/SUD</p> |            |         |         |



| CCO MH/SUD   | FFS MH/SUD | CCO M/S | FFS M/S |
|--|------------|---------|---------|
| <p>benefits and a one-year limit for M/S benefits, whereas OHP FFS applied a 90-day time frame for 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. Regarding IRR, the CCO conducted regular reviews using an 85 percent testing standard, whereas OHP FFS’s subcontractor 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 equitably structured for MH/SUD benefits.</p> |            |         |         |
| <p><b>Outcome</b></p>  |            |         |         |
| <p>HSAG determined YCCO’s processes, strategies, and evidentiary standards for UM of IP MH/SUD benefits to be comparable and no more stringently applied, in writing and in operation, to IP M/S benefits.</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 1–4 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 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   |
|--|--|--|---|---|
| <b>1. To which benefit is the NQTL assigned?</b>   |  |  |   |   |
| <ul style="list-style-type: none"> <li>• (2) Applied Behavior Analysis (ABA).</li> <li>• (2) OT, PT, ST for MH conditions are</li> </ul> | The following services are managed by DHS: | The following services require PA: <ul style="list-style-type: none"> <li>• (2) ABA.</li> <li>• (2- 4) MAT.</li> </ul> | <ul style="list-style-type: none"> <li>• (2) Specialist visits.</li> <li>• (2-4) Elective procedures performed</li> </ul> | The following services are managed by OHA: <ul style="list-style-type: none"> <li>• (2, 3) Out of hospital births.</li> </ul> |

| 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"> <li>(1) 1915(c) Comprehensive DD waiver.</li> <li>(1) 1915(c) Support Services DD waiver.</li> <li>(1) 1915(c) Behavioral DD Model waiver.</li> <li>(1) 1915(c) Aged &amp; Physically Disabled waiver.</li> <li>(1) 1915(c) Hospital Model waiver.</li> <li>(1) 1915(c) Medically Involved Children's NF waiver.</li> <li>(1) 1915(k) Community First Choice State Plan option.</li> <li>(1) 1915(j): Self-directed personal assistance.</li> </ul> | <ul style="list-style-type: none"> <li>(2) TMS.</li> <li>(2- 4) ECT.</li> <li>(2- 4) Children's wraparound.</li> <li>5% of HHS providers' charts are reviewed monthly.</li> <li>20% of non-HHS, contracted provider charts are reviewed quarterly.</li> <li>All OON services receive CR.</li> </ul> | <p>in outpatient hospital setting and/or ASC.</p> <ul style="list-style-type: none"> <li>(2, 4) Rehab.</li> <li>PT/OT/ST.</li> <li>(2, 3) Selected imaging and lab studies.</li> <li>(2, 4) DME.</li> <li>(2) Vision.</li> <li>(2, 4) Chiropractic.</li> </ul> | <ul style="list-style-type: none"> <li>(2) Home health services.</li> <li>(2) OT, PT, ST for MH conditions are managed through RR; PA is not required.</li> <li>(2, 3) Imaging.</li> <li>(2) DME.</li> </ul> |
| <p><b>2. Why is the NQTL assigned to these benefits?</b></p>  |  |   |  |  |
| <ul style="list-style-type: none"> <li>(2) HERC PL.</li> <li>(2) OAR 410-172-0650 for ABA services.</li> <li>(2) PA requests with insufficient</li> </ul> | <ul style="list-style-type: none"> <li>(1) The State requires PA of HCBS in order to meet federal requirements regarding PCSPs and ensure services are</li> </ul>  | <ul style="list-style-type: none"> <li>(2) To prevent services being delivered in violation of relevant OARs and associated HERC PL guidelines</li> </ul>   | <ul style="list-style-type: none"> <li>(2) To prevent services being delivered in violation of relevant OARs and associated HERC PL guidelines</li> </ul>  | <ul style="list-style-type: none"> <li>(2) To prevent services being delivered in violation of relevant OARs, associated HERC PL</li> </ul>  |

| FFS HCBS MH/SUD  | FFS HCBS M/S   | CCO MH/SUD   | CCO M/S   | FFS M/S  |
|--|--|--|---|--|
| documentation to demonstrate MNC or HERC PL guidelines are not being followed.   | provided in accordance with a participant’s PCSP and in the last restrictive setting.  | <ul style="list-style-type: none"> <li>(3) Services are associated with increased health or safety risks</li> <li>(4) To ensure care is medically necessary and delivered in the least restrictive environment</li> </ul>  | <ul style="list-style-type: none"> <li>(3) Services are associated with increased health or safety risks</li> <li>(4) To ensure care is medically necessary and delivered in the least restrictive environment</li> </ul> | and guidelines and federal regulations. <ul style="list-style-type: none"> <li>(3) Services are associated with increased health or safety risks.</li> </ul>   |
| <b>3. What evidence supports the rationale for the assignment?</b>   |  |  |   |  |
| <ul style="list-style-type: none"> <li>(2) HERC PL</li> <li>(2) OAR 410-172-0650 for ABA services.</li> <li>(2) PA requests with insufficient documentation to demonstrate medical necessity is not being met or HERC PL guidelines are not being followed.</li> </ul> | <ul style="list-style-type: none"> <li>(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.</li> <li>(1) Federal requirements regarding 1915(c) and 1915(i) services require that HCBS are provided in the least restrictive setting possible.</li> </ul> | <ul style="list-style-type: none"> <li>(2) OARs, HERC PL and guidelines</li> <li>(3) HERC guidelines re safety concerns</li> <li>(4) Oregon Performance Plan</li> <li>(OPP) requires that BH services are provided in least restrictive setting possible. The OPP is a DOJ-negotiated Olmsted settlement.</li> <li>(4) ASAM</li> </ul> | <ul style="list-style-type: none"> <li>(2) OARs, HERC PL and guidelines,</li> <li>(3) HERC guidelines re safety concerns</li> <li>(4) InterQual</li> </ul>  | <ul style="list-style-type: none"> <li>(2) HERC PL and guidelines, and clinical practice guidelines.</li> <li>(2) PA requests with insufficient documentation to demonstrate medical necessity are not being met or HERC PL guidelines are not being followed.</li> <li>(3) HERC Guidelines - Recommended limits on services for member safety.</li> </ul> |

| FFS HCBS MH/SUD  | FFS HCBS M/S  | CCO MH/SUD   | CCO M/S  | FFS M/S  |
|--|---|--|--|--|
| <b>4. What are the NQTL procedures?</b>  |   |  |  |  |
| <p><b>Timelines for authorizations:</b></p> <ul style="list-style-type: none"> <li>Urgent requests are processed in three business days and immediate requests in one business day. Routine requests are processed in 14 days.</li> <li>OT, PT, ST for MH conditions are managed through RR; PA is not required.</li> </ul>  | <p><b>Timelines for authorizations:</b></p> <ul style="list-style-type: none"> <li>A PCSP must be approved within 90 days from the date a completed application is submitted.</li> </ul>  | <p><b>Timelines for authorizations:</b></p> <ul style="list-style-type: none"> <li>Authorization decisions for urgent requests occur within</li> <li>24- 72 hours. Routine requests are addressed within 14 days.</li> </ul>   | <p><b>Timelines for authorizations:</b></p> <ul style="list-style-type: none"> <li>Authorization decisions for urgent requests occur within</li> <li>24- 72 hours. Routine requests are addressed within 14 days.</li> </ul>                           | <p><b>Timelines for authorizations:</b></p> <ul style="list-style-type: none"> <li>Urgent requests are processed in three business days and immediate requests in one business day. Routine requests are processed in 14 days.</li> <li>OT, PT, ST for MH conditions are managed through RR; PA is not required.</li> </ul>  |
| <p><b>Documentation requirements:</b></p> <ul style="list-style-type: none"> <li>Form is one cover page.</li> <li>Require diagnostic and CPT code and rationale for medical necessity plus any additional supporting documentation.</li> <li>In addition, as part of the supporting documentation ABA must have an evaluation and referral for treatment from a</li> </ul> | <p><b>Documentation requirements:</b></p> <ul style="list-style-type: none"> <li>The PCSP is based on a functional needs assessment and other supporting documentation. It is developed by the individual, the individual’s team, and the individual’s case manager.</li> </ul> | <p><b>Documentation requirements:</b></p> <ul style="list-style-type: none"> <li>Consistent with OARS, YCCO requires an assessment and treatment plan for review of the services listed in section one.</li> <li>A random sample of open and closed charts is selected for review for HHS and contracted providers. The sample includes charts for which more</li> </ul> | <p><b>Documentation requirements:</b></p> <ul style="list-style-type: none"> <li>YCCO requires a one page form that providers are encouraged to submit with supporting documentation.</li> <li>Documentation requirements are tied to OARS.</li> </ul> | <p><b>Documentation requirements:</b></p> <ul style="list-style-type: none"> <li>A cover page form is required. In addition, diagnostic information, a CPT code(s), a rationale for medical necessity plus any additional supporting documentation are required.</li> <li>Documentation supporting medical necessity is required at the time of billing</li> </ul> |



| FFS HCBS MH/SUD  | FFS HCBS M/S   | CCO MH/SUD  | CCO M/S  | FFS M/S  |
|--|--|---|--|--|
| <p>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).</p> <ul style="list-style-type: none"> <li>Documentation supporting medical necessity is required at the time of billing for OT, PT, ST services.</li> </ul> |  | <p>than one service was received during the review month and charts that were not previously reviewed in the past year.</p> <ul style="list-style-type: none"> <li>5% of HHS providers charts are reviewed monthly. 20% of non-HHS, contracted charts are reviewed quarterly. All OON services receive CR.</li> </ul> |  | <p>for OT, PT, ST services.</p>  |
| <p><b>Method of document submission:</b></p> <ul style="list-style-type: none"> <li>Paper (fax) or online PA/POC submitted prior to the delivery of services.</li> </ul>   | <p><b>Method of document submission:</b></p> <ul style="list-style-type: none"> <li>All 1915(c), 1915(k), and 1915(j) services must be included in a participant’s PCSP and approved by a qualified case manager at the local case management entity (CME) prior to service delivery.</li> <li>Information is obtained during a face-to-face meeting, often at the individual’s location.</li> </ul> | <p><b>Method of document submission:</b></p> <ul style="list-style-type: none"> <li>The documentation is provided telephonically, by fax or online.</li> </ul>  | <p><b>Method of document submission:</b></p> <ul style="list-style-type: none"> <li>Providers may submit this information directly through our provider CIM portal.</li> </ul> | <p><b>Method of document submission:</b></p> <ul style="list-style-type: none"> <li>Paper (fax) or online PA/POC submitted prior to the delivery of services.</li> </ul> |

| FFS HCBS MH/SUD  | FFS HCBS M/S  | CCO MH/SUD  | CCO M/S  | FFS M/S  |
|--|---|---|--|--|
| <p><b>Qualifications of reviewers:</b></p> <ul style="list-style-type: none"> <li>• For ABA services, physicians review services.</li> <li>• For OT, PT, ST services, nurses may authorize and deny services.</li> <li>• Professional peers deny for other OP services.</li> </ul> | <p><b>Qualifications of reviewers:</b></p> <ul style="list-style-type: none"> <li>• A case manager must have at least:               <ul style="list-style-type: none"> <li>– A bachelor's degree (BA) in behavioral science, social science, or a closely related field; or</li> <li>– A BA in any field AND one year of human services related experience; or</li> <li>– An associate's degree (AA) in a behavioral science, social science, or a closely related field AND two years human services related experience; or</li> </ul> </li> <li>• Three years of human services related experience.</li> </ul> | <p><b>Qualifications of reviewers:</b></p> <ul style="list-style-type: none"> <li>• LPC, CADAC and dually certified professionals review cases. The dually credentialed individual can deny in consultation with the medical director.</li> <li>• Notices are still sent if a provider asks for a specific service or number of services that is not authorized.</li> </ul> | <p><b>Qualifications of reviewers:</b></p> <ul style="list-style-type: none"> <li>• Licensed RNs can make authorization decisions, including some denials, relative to InterQual and HERC coverage criteria.</li> <li>• Most denials are reviewed by the Medical Directors.</li> </ul> | <p><b>Qualifications of reviewers:</b></p> <ul style="list-style-type: none"> <li>• Nurses may authorize and deny services.</li> </ul> |



| FFS HCBS MH/SUD  | FFS HCBS M/S   | CCO MH/SUD  | CCO M/S   | FFS M/S  |
|--|--|---|---|--|
| <p><b>Criteria:</b></p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> | <p><b>Criteria:</b></p> <ul style="list-style-type: none"> <li>• Qualified case managers approve or deny services in the PCSP consistent with waiver/state plan and OAR requirements.</li> <li>• Once a PCSP is approved, it is entered into the payment management system as authorization by the CME staff.</li> </ul> | <p><b>Criteria:</b></p> <ul style="list-style-type: none"> <li>• ASAM, HERC PL and guideline notes and OARs. For MH OP, the CCO applies criteria it developed (see IP above).</li> </ul>  | <p><b>Criteria:</b></p> <ul style="list-style-type: none"> <li>• InterQual, HERC PL and guideline notes, and OARs.</li> </ul>   | <p><b>Criteria:</b></p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> |
| <p><b>Reconsideration/RR:</b></p> <ul style="list-style-type: none"> <li>• A provider may request review of a denial decision, which occurs in weekly MMC meetings or Comagine’s own comparable MMC meeting.</li> </ul>  | <p><b>Reconsideration/RR:</b></p> <ul style="list-style-type: none"> <li>• (c) NA</li> </ul>   | <p><b>Reconsideration/RR:</b></p> <ul style="list-style-type: none"> <li>• If a provider fails to obtain PA, the CCO will allow providers to submit the medical record for a RR of medical necessity. If care is deemed medically necessary to meet coverage</li> </ul> | <p><b>Reconsideration/RR:</b></p> <ul style="list-style-type: none"> <li>• If a provider fails to obtain PA, the CCO will allow providers to submit the medical record for a RR of medical necessity. If care is deemed medically necessary to meet coverage</li> </ul> | <p><b>Reconsideration/RR:</b></p> <ul style="list-style-type: none"> <li>• A review of a denial decision can be requested and is reviewed in weekly MMC meetings.</li> <li>• RR authorization requests can be made within 90 days of the date of service or after</li> </ul>   |

| FFS HCBS MH/SUD  | FFS HCBS M/S  | CCO MH/SUD  | CCO M/S   | FFS M/S   |
|--|---|---|---|---|
| <ul style="list-style-type: none"> <li>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.</li> <li>OT, PT, ST are reviewed after the initial service prior to payment. Additionally, denial decisions can be requested and reviewed at weekly MMC meetings.</li> </ul> |   | <p>criteria, coverage is provided.</p>  | <p>criteria, coverage is provided.</p>  | <p>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"> <li>OT, PT, ST are reviewed after the initial service prior to payment. Additionally, denial decisions can be requested and reviewed at weekly MCM meetings.</li> </ul> |
| <p><b>Consequences for failure to authorize:</b></p> <ul style="list-style-type: none"> <li>Failure to obtain authorization may result in non-payment.</li> </ul>  | <p><b>Consequences for failure to authorize:</b></p> <ul style="list-style-type: none"> <li>Failure to obtain authorization may result in non-payment.</li> </ul> | <p><b>Consequences for failure to authorize:</b></p> <ul style="list-style-type: none"> <li>Failure to obtain PA and absence of MNC may result in non-payment.</li> </ul> | <p><b>Consequences for failure to authorize:</b></p> <ul style="list-style-type: none"> <li>Failure to obtain PA and absence of MNC may result in non-payment.</li> </ul> | <p><b>Consequences for failure to authorize:</b></p> <ul style="list-style-type: none"> <li>Failure to obtain authorization may result in non-payment.</li> </ul>   |
| <p><b>Appeals:</b></p> <ul style="list-style-type: none"> <li>Notice and fair hearing rights apply.</li> </ul>   | <p><b>Appeals:</b></p> <ul style="list-style-type: none"> <li>Notice and fair hearing rights apply.</li> </ul>  | <p><b>Appeals:</b></p> <ul style="list-style-type: none"> <li>Appeal processes are applicable, but work to form partnerships through negotiation.</li> </ul>              | <p><b>Appeals:</b></p> <ul style="list-style-type: none"> <li>Appeal processes are applicable.</li> </ul>   | <p><b>Appeals:</b></p> <ul style="list-style-type: none"> <li>Notice and fair hearing rights apply.</li> </ul>  |



| FFS HCBS MH/SUD  | FFS HCBS M/S   | CCO MH/SUD  | CCO M/S  | FFS M/S  |
|--|--|---|--|--|
| <b>5. How frequently or strictly is the NQTL applied?</b>  |  |   |  |  |
| <p><b>Frequency of review:</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>ABA is usually multiple service codes approved for 6 months.</li> <li>Exceptions may be made at the discretion of the MMC, which is led by the HSD medical director.</li> </ul> | <p><b>Frequency of review:</b></p> <ul style="list-style-type: none"> <li>PCSPs are reviewed and revised as needed, but at least every 12 months.</li> </ul> | <p><b>Frequency of review:</b></p> <ul style="list-style-type: none"> <li>PA for ABA is usually for 6 months. A second PA is required when initial auth is exhausted and more units are necessary.</li> <li>PAs for other OP services are granted for different LOS depending on the service and the assessed level-of-care (LOC) and can be adjusted.</li> <li>Auths for extensive services usually range from 6 months to 1 year consistent with LOC criteria.</li> </ul> | <p><b>Frequency of review:</b></p> <ul style="list-style-type: none"> <li>Services that are self-limiting when the purpose of the service is achieved (for example, OP surgery) are authorized for the number of units necessary for completion.</li> <li>In general, frequency of review varies by type of services or program with authorizations ranging from 30 days to one year.</li> </ul> | <p><b>Frequency of review:</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>Exceptions may be made at the discretion of the MMC, which is led by the HSD medical director.</li> </ul> |
| <p><b>Reconsideration/RR:</b></p> <ul style="list-style-type: none"> <li>A provider may request review of a denial decision, which occurs in weekly MMC meetings or Comagine's own</li> </ul>  | <p><b>Reconsideration/RR:</b></p> <ul style="list-style-type: none"> <li>N/A</li> </ul>  | <p><b>RR conditions and timelines:</b></p> <ul style="list-style-type: none"> <li>RR accepted, no timeframe applied.</li> </ul>   | <p><b>RR conditions and timelines:</b></p> <ul style="list-style-type: none"> <li>RR accepted, no timeframe applied.</li> </ul>  | <p><b>Reconsideration/RR:</b></p> <ul style="list-style-type: none"> <li>A review of a denial decision can be requested and is reviewed in weekly MMC meetings.</li> <li>RR authorization requests can be made</li> </ul>  |

| 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"> <li>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.</li> <li>OT, PT, ST are reviewed after the initial service prior to payment. Additionally, denial decisions can be requested and reviewed at weekly MMC meetings.</li> </ul> |  |   |  | <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"> <li>OT, PT, ST are reviewed after the initial service prior to payment. Additionally, denial decisions can be requested and reviewed at weekly MCM meetings.</li> </ul> |
| <p><b>Methods to promote consistent application of criteria:</b></p> <ul style="list-style-type: none"> <li>For ABA, a sample of cases are reviewed for ability to address assessed member</li> </ul>   | <p><b>Methods to promote consistent application of criteria:</b></p> <ul style="list-style-type: none"> <li>DHS Quality Assurance Review teams review a representative sample of PCSPs as part of</li> </ul> | <p><b>Methods to promote consistent application of criteria:</b></p> <ul style="list-style-type: none"> <li>Samples of authorization decisions are reviewed during</li> </ul> | <p><b>Methods to promote consistent application of criteria:</b></p> <ul style="list-style-type: none"> <li>Annually, the CCO reviews 5 cases per reviewer to assess criteria application</li> </ul> | <p><b>Methods to promote consistent application of criteria:</b></p> <ul style="list-style-type: none"> <li>Nurses are trained on the application of the HERC guidelines, which is spot checked</li> </ul>   |

| FFS HCBS MH/SUD   | FFS HCBS M/S   | CCO MH/SUD  | CCO M/S  | FFS M/S   |
|---|--|---|--|---|
| needs and whether OARs were met.  | <p>quality assurance and case review activities to assure that PCSPs meet program standards.</p> <ul style="list-style-type: none"> <li>Additionally, OHA staff review a percentage of files to assure quality and compliance.</li> </ul>  | <p>weekly team meetings.</p> <ul style="list-style-type: none"> <li>In June, the CCO began reviewing a sample of cases for each of the 4 reviewers to assess criteria application. Goal is to obtain 75% agreement among the four (i.e., three out of four). Plan to move to formal IRR testing.</li> </ul> | with a standard of 80%.  | through ongoing supervision.  |
| <p><b>6. What standard supports the frequency or rigor with which the NQTL is applied?</b></p>  |  |   |  |   |
| <p><b>Evidence for UM frequency:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> | <p><b>Evidence for UM frequency:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> | <p><b>Evidence for UM frequency:</b></p> <ul style="list-style-type: none"> <li>Guidelines from clinical professional organizations are used to establish PA frequency.</li> </ul>  | <p><b>Evidence for UM frequency:</b></p> <ul style="list-style-type: none"> <li>InterQual guidelines, provider requests and expected progress determine frequency of review.</li> <li>DME review frequency is tied to length of the rental contract or type of DME.</li> </ul> | <p><b>Evidence for UM frequency:</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>The amount of time a PA covers for services is limited by OAR</li> </ul> |



| FFS HCBS MH/SUD  | FFS HCBS M/S   | CCO MH/SUD  | CCO M/S  | FFS M/S  |
|--|--|---|--|--|
| <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul> |  |   |  | <p>410-120-1320(7) which states that PAs can be approved and renewed up to one year at a time.</p> <ul style="list-style-type: none"> <li>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.</li> </ul> |
| <p><b>Data reviewed to determine UM application:</b></p> <ul style="list-style-type: none"> <li>A physician-led group of clinical professionals conduct an annual review to determine which services receive or retain a PA; items reviewed include:</li> </ul>  | <p><b>Data reviewed to determine UM application:</b></p> <ul style="list-style-type: none"> <li>N/A</li> </ul> | <p><b>Data reviewed to determine UM application:</b></p> <ul style="list-style-type: none"> <li>Contractor reports are reviewed on a quarterly basis and include: denial and appeal rates and hearing results.</li> </ul> | <p><b>Data reviewed to determine UM application:</b></p> <ul style="list-style-type: none"> <li>Review IRR measures, denial and appeal rates and hearing results.</li> </ul> | <p><b>Data reviewed to determine UM application:</b></p> <ul style="list-style-type: none"> <li>A physician-led group of clinical professionals conduct an annual review to determine which services receive or retain a PA; items reviewed include:</li> </ul>  |

| FFS HCBS MH/SUD   | FFS HCBS M/S   | CCO MH/SUD  | CCO M/S   | FFS M/S  |
|---|--|---|---|--|
| <ul style="list-style-type: none"> <li>- Utilization.</li> <li>- Approval/denial rates.</li> <li>- Documentation/justification of services.</li> <li>- Cost data.</li> </ul>  |  |   |   | <ul style="list-style-type: none"> <li>- Utilization.</li> <li>- Approval/denial rates.</li> <li>- Documentation/justification of services.</li> <li>- Cost data.</li> </ul> |
| <p><b>IRR standard (OHA):</b></p> <ul style="list-style-type: none"> <li>• KEPRO has a formal policy including an 80% standard using InterQual criteria.</li> </ul> <p><b>IRR standard (Comagine):</b></p> <ul style="list-style-type: none"> <li>• Spot-checks performed through supervision. Formal policy to be developed.</li> </ul> <p><b>IRR standard (Comagine Health):</b></p> <ul style="list-style-type: none"> <li>• Spot-checks performed through supervision.</li> </ul> | <p><b>IRR standard:</b></p> <ul style="list-style-type: none"> <li>• Spot-checks performed through supervision.</li> </ul> | <p><b>IRR standard:</b></p> <ul style="list-style-type: none"> <li>• Reviews conducted annually, 85% standard.</li> </ul> | <p><b>IRR standard:</b></p> <ul style="list-style-type: none"> <li>• Reviews conducted annually, 85% standard.</li> </ul> | <p><b>IRR standard (OHA):</b></p> <ul style="list-style-type: none"> <li>• KEPRO has a formal policy including an 80% standard using InterQual criteria.</li> </ul>          |
| <b>Analysis</b>   |  |   |   |  |
| <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</p>  |  |   |   |  |



| FFS HCBS MH/SUD   | FFS HCBS M/S | CCO MH/SUD | CCO M/S | FFS M/S |
|---|--------------|------------|---------|---------|
| <p>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> <p>HSAG’s analysis of YCCO’s PA data for IP and OP benefits did not reveal any concerns related to MHP. Of the total 6,020 IP and OP PA requests reported, 19.80 percent were denied. Of the 28 MH/SUD PA requests denied, representing 5.54 percent of the 505 total PA denials, only one was appealed. Approximately 73 percent of the MH/SUD PA request denials were requests for OP benefits, which were primarily denied for a “medical necessity” categorical reason.</p> <p><b><u>Comparability</u></b></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 included HERC guidelines. HSAG determined the rationale and evidence to be comparable.</p> <p>YCCO and OHP FFS made authorization decisions within 24 hours for emergencies, 72 hours for urgent requests, and 14 days for standard requests. Most CCO documentation requirements for MH/SUD included an admission note and records submitted via telephone, fax, or electronically. 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 individual, the individual’s team, and the individual’s case manager. Qualified individuals conducted UM applying OARs, HERC, InterQual, 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 physicians and 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 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><b><u>Stringency</u></b></p> <p>PA and CR frequencies for both MH/SUD and M/S benefits were based on 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. YCCO had no time frame for RR for MH/SUD benefits and a one-year limit for M/S benefits, whereas OHP FFS applied a 90-day time frame for M/S benefits. MH/SUD and M/S</p> |              |            |         |         |



| FFS HCBS MH/SUD   | FFS HCBS M/S | CCO MH/SUD | CCO M/S | FFS M/S |
|---|--------------|------------|---------|---------|
| <p>denial decisions could be challenged through appeals and/or State fair hearing processes. Failure to obtain authorization could result in noncoverage. Regarding IRR, the CCO conducted regular reviews using an 85 percent testing standard, whereas OHP FFS’s subcontractor 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 equitably structured for MH/SUD benefits.</p> |              |            |         |         |
| <p><b>Outcome</b></p>   |              |            |         |         |
| <p>HSAG determined YCCO’s UM processes, strategies, and evidentiary standards for OP MH/SUD benefits to be comparable and no more stringently applied, in writing and in operation, to OP M/S benefits.</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 YCCO’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  |
|--|---|--|
| <b>1. To which benefit is the NQTL assigned?</b>   |   |  |
| <ul style="list-style-type: none"> <li>A, F, P, S drug groups</li> </ul>   | <ul style="list-style-type: none"> <li>A and F drug groups</li> <li>MH carve out drugs do not have an enforceable preferred drug list.</li> <li>While certain higher cost-effect agents are listed as “preferred,” this is not enforced by PA.</li> </ul> | <ul style="list-style-type: none"> <li>A, F, P, S drug groups</li> </ul>   |
| <b>2. Why is the NQTL assigned to these benefits?</b>  |   |  |
| <ul style="list-style-type: none"> <li>Prior authorization is applied to prescription drugs to promote appropriate and safe treatment of funded conditions and to encourage use of preferred agents.</li> <li>Prior authorization is applied to prescription drugs due to cost trends far outpacing revenue and/or other medical cost trends.</li> </ul> | <ul style="list-style-type: none"> <li>To promote appropriate and safe treatment of funded conditions.</li> </ul>   | <ul style="list-style-type: none"> <li>Prior authorization is applied to prescription drugs to promote appropriate and safe treatment of funded conditions and to encourage use of preferred agents.</li> <li>Prior authorization is applied to prescription drugs due to cost trends far outpacing revenue and/or other medical cost trends.</li> </ul> |



| CCO MH/SUD   | FFS MH Carve Out   | CCO M/S  |
|--|--|--|
| <b>3. What evidence supports the rationale for the assignment?</b>   |  |  |
| <ul style="list-style-type: none"> <li>• Evidence for applying PA criteria to a drug includes:               <ul style="list-style-type: none"> <li>– FDA prescribing guidelines</li> <li>– Medical literature</li> <li>– Best practices</li> <li>– Professional guidelines</li> <li>– CMS accepted compendia</li> </ul> </li> <li>• (Micromedex)</li> </ul>   | <ul style="list-style-type: none"> <li>• FDA prescribing guidelines, medical evidence, best practices, professional guidelines, and P&amp;T Committee review and recommendations.</li> <li>• Federal and state regulations/OAR and the Prioritized List.</li> </ul>  | <ul style="list-style-type: none"> <li>• Evidence for applying PA criteria to a drug includes:               <ul style="list-style-type: none"> <li>– FDA prescribing guidelines</li> <li>– Medical literature</li> <li>– Best practices</li> <li>– Professional guidelines</li> <li>– CMS accepted compendia</li> </ul> </li> <li>• (Micromedex)</li> </ul>   |
| <b>4. What are the NQTL procedures?</b>  |  |  |
| <ul style="list-style-type: none"> <li>• PA requests can be mailed or faxed (more typical) to the Pharmacy Call Center. The standard PA form is one page long. Most PA criteria require chart notes.</li> <li>• PA requests can also be submitted electronically through electronic medical record if enabled.</li> <li>• All PA requests are responded to within 24 hours.</li> <li>• The PA criteria are developed by pharmacists in consultation with the P&amp;T Committee.</li> <li>• Failure to obtain PA in combination with an absence of medical necessity results in a rejected claim/no payment.</li> </ul> | <ul style="list-style-type: none"> <li>• 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.</li> <li>• The standard PA form is one page long, except for nutritional supplement requests. Most PA criteria require clinical documentation such as chart notes.</li> <li>• All PA requests are responded to within 24 hours.</li> <li>• The PA criteria are developed by pharmacists in consultation with the P&amp;T Committee.</li> <li>• Failure to obtain PA in combination with an absence of medical necessity results in no provider reimbursement.</li> <li>• Notice of Benefit Determination sent to both Recipient and Provider. - Denials</li> </ul> | <ul style="list-style-type: none"> <li>• PA requests can be mailed or faxed (more typical) to the Pharmacy Call Center. The standard PA form is one page long. Most PA criteria require chart notes.</li> <li>• PA requests can also be submitted electronically through electronic medical record if enabled.</li> <li>• All PA requests are responded to within 24 hours.</li> <li>• The PA criteria are developed by pharmacists in consultation with the P&amp;T Committee.</li> <li>• Failure to obtain PA in combination with an absence of medical necessity results in a rejected claim/no payment.</li> </ul> |

| CCO MH/SUD  | FFS MH Carve Out  | CCO M/S  |
|---|---|--|
|   | <p>letters include information on required criteria, denial reasons, and how the provider can appeal and member hearing rights.</p>   |  |
| <p><b>5. How frequently or strictly is the NQTL applied?</b></p>  |   |  |
| <ul style="list-style-type: none"> <li>Typically, the frequency range is six months to a year, depending on medical appropriateness and safety, as recommended by the P&amp;T Committee.</li> <li>Approximately 48% of MH/SUD drugs are subject to PA criteria for clinical reasons.</li> <li>Providers can appeal denials on behalf of a member, and members have appeal and fair hearing rights.</li> <li>The CCO assesses stringency through review of PA denial/approval and appeal rates.</li> </ul> | <ul style="list-style-type: none"> <li>The State approves PAs for up to 12 months, depending on medical appropriateness and safety, as recommended by the P&amp;T Committee.</li> <li>Approximately 19% of MH/SUD drugs are subject to PA criteria for clinical reasons.</li> <li>The State allows providers to submit additional information for reconsideration of a denial.</li> <li>Providers can appeal denials on behalf of a member, and members have fair hearing rights.</li> <li>There were 10 client fair hearing requests for denied MH/SUD medications. None were reversed after agency reconsideration or, and none were reversed by hearing.</li> <li>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.</li> <li>PA criteria are reviewed as needed due to clinical developments, literature, studies, and FDA medication approvals.</li> </ul> | <ul style="list-style-type: none"> <li>Typically, the frequency range is six months to a year, depending on medical appropriateness and safety, as recommended by the P&amp;T Committee.</li> <li>Approximately 28% of M/S drugs are subject to PA criteria for clinical reasons.</li> <li>Providers can appeal denials on behalf of a member, and members have appeal and fair hearing rights.</li> <li>The CCO assesses stringency through review of PA denial/approval and appeal rates.</li> </ul> |



| CCO MH/SUD   | FFS MH Carve Out  | CCO M/S  |
|--|---|--|
| <b>6. What standard supports the frequency or rigor with which the NQTL is applied?</b>  |   |  |
| <ul style="list-style-type: none"> <li>• Evidence for applying PA criteria to a drug includes:               <ul style="list-style-type: none"> <li>– FDA prescribing guidelines</li> <li>– Medical literature</li> <li>– Best practices</li> <li>– Professional guidelines</li> <li>– CMS accepted compendia</li> </ul> </li> <li>• (Micromedex)</li> </ul>   | <ul style="list-style-type: none"> <li>• FDA prescribing guidelines, medical evidence, best practices, professional guidelines, and P&amp;T Committee review and recommendations.</li> <li>• Federal and state regulations/OAR and the Prioritized List.</li> </ul> | <ul style="list-style-type: none"> <li>• Evidence for applying PA criteria to a drug includes:               <ul style="list-style-type: none"> <li>– FDA prescribing guidelines</li> <li>– Medical literature</li> <li>– Best practices</li> <li>– Professional guidelines</li> <li>– CMS accepted compendia</li> </ul> </li> <li>• (Micromedex)</li> </ul> |
| <b>Analysis</b>  |   |  |
| <p>YCCO 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>HSAG’s analysis of YCCO’s counts for prescription drug PA requests did not reveal any concerns related to parity. Of the total 1,046 prescription drug PA requests reported, 33.27 percent were denied. Less than 1 percent (0.57 percent) of the 348 prescription drug PA request denials were appealed, with two PA denials resulting in an overturned decision. The prescription drug PA request denials were primarily due to “medically necessary” and “not covered” categorical reasons.</p>  |   |  |
| <p><b><u>Comparability</u></b></p>   |   |  |
| <p>The State 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 are subject to PA included Food and Drug Administration (FDA) prescribing guidelines, medical evidence, best practices, professional guidelines, and Pharmacy and Therapeutic (P&amp;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&amp;T Committee. PA requests for both MH/SUD and M/S drugs could be submitted by fax, phone, or online.</p> |   |  |
| <p><b><u>Stringency</u></b></p>  |   |  |
| <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</p>   |   |  |



| CCO MH/SUD   | FFS MH Carve Out | CCO M/S |
|--|------------------|---------|
| <p>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&amp;T Committee, based on clinical evidence such as FDA prescribing guidelines, best practices, and clinical practice guidelines. Both the CCO and OHA allowed exceptions to the formulary and preferred drug list based on medical necessity. For carve-out drugs covered by OHA, the CCO stated that it works with pharmacies and providers to redirect PA requests and claims to OHA.</p> |                  |         |
| <p><b>Outcome</b></p>  |                  |         |
| <p>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.</p>  |                  |         |



## 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 YCCO’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   |
|---|---|---|---|
| <b>1. To which benefit is the NQTL assigned?</b>  |   |   |   |
| <ul style="list-style-type: none"> <li>CCO may close its network for new participating MH/SUD providers of inpatient services.</li> <li>CCO may close its network for new providers of outpatient MH/SUD services when CCO determines there is no need for additional providers.</li> </ul> | <ul style="list-style-type: none"> <li>The State does not restrict new providers of inpatient or outpatient MH/SUD services from enrollment.</li> </ul> | <ul style="list-style-type: none"> <li>CCO may close its network for new M/S providers of inpatient services.</li> <li>CCO may close its network for new providers of outpatient M/S services when CCO determines there is no need for additional providers.</li> </ul> | <ul style="list-style-type: none"> <li>The State does not restrict new providers of inpatient or outpatient MH/SUD services from enrollment.</li> </ul> |
| <b>2. Why is the NQTL assigned to these benefits?</b>   |   |   |   |
| <ul style="list-style-type: none"> <li>CCO closes its network to additional MH/SUD providers when it determines there is no need for additional</li> </ul>  | <ul style="list-style-type: none"> <li>N/A</li> </ul>   | <ul style="list-style-type: none"> <li>CCO closes its network to additional M/S providers when it determines there is no need for additional providers,</li> </ul>  | <ul style="list-style-type: none"> <li>N/A</li> </ul>   |

| CCO MH/SUD  | FFS MH/SUD  | CCO M/S  | FFS M/S   |
|---|---|--|---|
| <p>providers, market forces, available alternatives, and network adequacy.</p>  |   | <p>to enhance efficiency, promote efficient</p> <ul style="list-style-type: none"> <li>provider monitoring, and improve provider relations.</li> </ul>   |   |
| <p><b>3. What evidence supports the rationale for the assignment?</b></p>   |   |  |   |
| <ul style="list-style-type: none"> <li>Network sufficiency standards are required by 42 CFR 438.206.</li> <li>Requirements related to the selection and retention of providers are specified in 42 CFR 438.214.</li> <li>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 maintain quality and control costs.</li> <li>State rule related to network sufficiency standards, OAR 410-141-0220.</li> <li>Requirements related to exceptional needs pursuant to 42 CFR 438.207 and 438.208, also reflected in HHS Policy.</li> </ul> | <ul style="list-style-type: none"> <li>N/A</li> </ul> | <ul style="list-style-type: none"> <li>Network sufficiency standards are required by 42 CFR 438.206.</li> <li>Requirements related to the selection and retention of providers are specified in 42 CFR 438.214.</li> <li>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 maintain quality and control costs.</li> <li>State rule related to network sufficiency standards, OAR 410-141-0220.</li> <li>Requirements related to exceptional needs pursuant to 42 CFR 438.207 and 438.208</li> </ul> | <ul style="list-style-type: none"> <li>N/A</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD  | CCO M/S  | FFS M/S   |
|--|---|--|---|
| <ul style="list-style-type: none"> <li>ORS 297 establishes the contracting/procurement requirements that apply to the CCO as a governmental entity, including ORS 279B.050 (Methods of Source Selection) and ORS 279B.060 (12) (RFP process).</li> </ul>   |   |  |   |
| <b>4. What are the NQTL procedures?</b>  |   |  |   |
| <ul style="list-style-type: none"> <li>New providers that are denied admission into the network due to network closure will not be able to participate in the CCO network and may not be reimbursed for services provided to CCO members.</li> <li>CCO, as a governmental entity, uses an RFP process to add participating providers as determined necessary by the factors identified. The RFP process must be used unless it is a sole source contract.</li> <li>Staff in CCO’s provider relations department are responsible for the decision-making process to close the network.</li> <li>CCO evaluates need for providers, market forces,</li> </ul> | <ul style="list-style-type: none"> <li>N/A</li> </ul> | <ul style="list-style-type: none"> <li>New providers that are denied admission into the network due to network closure will not be able to participate in the CCO network and may not be reimbursed for services provided to CCO members.</li> <li>CCO provider relations department maintains and monitors a spreadsheet of open and closed categories/specialties. When more than adequate access to care is met (i.e., time and distance standards) then a determination is made to close the network to that particular category/specialty. The CCO declines to</li> </ul> | <ul style="list-style-type: none"> <li>N/A</li> </ul> |



| CCO MH/SUD   | FFS MH/SUD | CCO M/S  | FFS M/S |
|--|------------|--|---------|
| <p>available alternatives, and network adequacy to support decisions to close the network.</p> <ul style="list-style-type: none"> <li>• CCO evaluates the need for providers by evaluating timely and geographic access, reviewing grievances regarding access to care concerns, whether providers are accepting new patients and the mix of provider specialties available in network.</li> <li>• Providers not selected through the RFP process may appeal under ORS 279B.425. If a provider would like to grieve the lack of an open RFP, they may do so by writing a letter to the Board of Commissioners, who function as the Local Contract Review Board.</li> <li>• Exceptions are not made for accepting participating providers; however, the CCO accepts non par providers based upon consumer choice. These are handled as SCAs.</li> </ul> |            | <p>negotiate contracts in areas without need.</p> <ul style="list-style-type: none"> <li>• CCO evaluates need for providers to support decisions to close the network.</li> <li>• Provider need is determined by evaluating network adequacy using CMS time and distance standards and evaluating access through review of member complaints and PCP capacity reporting.</li> <li>• Providers that are denied the opportunity to participate in CCO's network may not challenge CCO's decision.</li> <li>• Exceptions may be made when a provider joins a large IPA/specialty care group.</li> </ul> |         |

| CCO MH/SUD   | FFS MH/SUD  | CCO M/S  | FFS M/S   |
|--|---|--|---|
| <b>5. How frequently or strictly is the NQTL applied?</b>  |   |  |   |
| <ul style="list-style-type: none"> <li>When the CCO decides to close the network to particular provider types, all new providers applying for those particular provider types are subject to this NQTL.</li> <li>CCO is not sure of the exact number of provider(s)/provider type(s) impacted by CCO’s decision to close all or part of its network to new providers in the last contract year; however, the CCO permits providers to deliver services as non-par providers based upon consumer choice.</li> </ul> | <ul style="list-style-type: none"> <li>N/A</li> </ul> | <ul style="list-style-type: none"> <li>When the CCO decides to close the network to particular provider types, all new providers applying for those particular provider types are subject to this NQTL.</li> <li>CCO is not sure of the exact number of provider(s)/provider type(s) impacted by CCO’s decision to close all or part of its network to new providers in the last contract year; however, the number is minimal given YCCO is in a rural area and provider shortage has been an issue.</li> </ul> | <ul style="list-style-type: none"> <li>N/A</li> </ul> |
| <b>6. What standard supports the frequency or rigor with which the NQTL is applied?</b>  |   |  |   |
| <ul style="list-style-type: none"> <li>The CCO reviews the following data/information to determine how strictly to apply the criteria/considerations to close the CCO network to new providers – Member access to care measures (e.g., timely access, distance)</li> </ul>   | <ul style="list-style-type: none"> <li>N/A</li> </ul> | <ul style="list-style-type: none"> <li>The CCO reviews the following data/information to determine how strictly to apply the criteria/considerations to close the CCO network to new providers:               <ul style="list-style-type: none"> <li>Member access to care measures (e.g., timely access, distance).</li> </ul> </li> </ul>  | <ul style="list-style-type: none"> <li>N/A</li> </ul> |

| CCO MH/SUD  | FFS MH/SUD | CCO M/S   | FFS M/S |
|---|------------|---|---------|
| <ul style="list-style-type: none"> <li>– Provider to member ratios.</li> <li>– Provider availability.</li> <li>– Inpatient rates.</li> <li>– Complaints and grievances.</li> <li>– Multiple SCAs from a particular provider.</li> </ul>   |            | <ul style="list-style-type: none"> <li>– Provider to member ratios.</li> <li>– Provider availability.</li> <li>– Inpatient rates.</li> <li>– Complaints and grievances.</li> <li>– Multiple SCAs from a single provider.</li> </ul> |         |
| <b>Analysis</b>   |            |   |         |
| <p>YCCO may close its network to IP and 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 a managed care organization (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 required the CCO to meet network sufficiency standards, which impacts the application of this NQTL category. In addition, provider network admission limits did not apply to FFS benefits and the application of provider network admission NQTLs for benefits delivered under managed care as supported by 42 CFR §438.206 and §438.12. Accordingly, parity was not analyzed.</p> |            |   |         |
| <b><u>Comparability</u></b>   |            |   |         |
| <p>At the time of the MHP analysis, the CCO reported no network closures for MH/SUD or M/S providers. CCO network closures would be decided 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-effective and meets the triple aim. YCCO reported that it evaluates the need for MH/SUD and M/S providers, market forces, available alternatives, and to support decisions to close the network. Based on these findings, the CCO’s strategy and evidence for closing the network to MH/SUD and M/S 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>  |            |   |         |
| <b><u>Stringency</u></b>  |            |   |         |
| <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. The need for providers was evaluated based on timely and geographic access, grievances regarding access to care concerns, and whether providers are accepting new patients and the mix of provider specialties available in network. YCCO’s reported information identified that when it determines a particular provider type is not needed, provider requests to join the network are declined and the</p>  |            |   |         |



| CCO MH/SUD   | FFS MH/SUD | CCO M/S | FFS M/S |
|--|------------|---------|---------|
| <p>provider may not be reimbursed for provided services. Denied providers may appeal the CCO's decision. Evaluations and decisions were applied equitably across both benefit types, resulting in no unbalanced stringency.</p>      |            |         |         |
| <p><b>Outcome</b></p>  |            |         |         |
| <p>HSAG's analysis of YCCO'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 YCCO’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  |
|---|--|--|--|
| <b>1. To which benefit is the NQTL assigned?</b>  |  |  |  |
| <ul style="list-style-type: none"> <li>CCO requires all participating providers to meet credentialing and re-credentialing requirements.</li> <li>CCO does not apply provider requirements in addition to State licensing.</li> </ul> | <ul style="list-style-type: none"> <li>All FFS providers must be enrolled as a provider with Oregon Medicaid</li> <li>The State does not apply provider requirements in addition to State licensing.</li> </ul>      | <ul style="list-style-type: none"> <li>CCO requires all participating providers to meet credentialing and re-credentialing requirements.</li> <li>N/A</li> </ul>   | <ul style="list-style-type: none"> <li>All FFS providers must be enrolled as a provider with Oregon Medicaid</li> <li>The State does not apply provider requirements in addition to State licensing.</li> </ul>      |
| <b>2. Why is the NQTL assigned to these benefits?</b>   |  |  |  |
| <ul style="list-style-type: none"> <li>CCO applies credentialing and re-credentialing requirements to:               <ul style="list-style-type: none"> <li>Meet State and Federal requirements</li> </ul> </li> </ul>                | <ul style="list-style-type: none"> <li>Provider enrollment is required by State law and Federal regulations. The State also specifies requirements for provider enrollment in order to ensure beneficiary</li> </ul> | <ul style="list-style-type: none"> <li>CCO applies credentialing and re-credentialing requirements to:               <ul style="list-style-type: none"> <li>Meet State and Federal requirements</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>Provider enrollment is required by State law and Federal regulations. The State also specifies requirements for provider enrollment in order to ensure beneficiary</li> </ul> |

| CCO MH/SUD  | FFS MH/SUD  | CCO M/S  | FFS M/S   |
|---|---|--|---|
| <ul style="list-style-type: none"> <li>– Ensure capabilities of provider to deliver high quality of care</li> <li>– Ensure provider meets minimum competency standards</li> </ul>   | <p>health and safety and to reduce Medicaid provider fraud, waste, and abuse.</p>   | <ul style="list-style-type: none"> <li>– Ensure capabilities of provider to deliver high quality of care</li> <li>– Ensure provider meets minimum competency standards</li> </ul>  | <p>health and safety and to reduce Medicaid provider fraud, waste, and abuse.</p>   |
| <p><b>3. What evidence supports the rationale for the assignment?</b></p>   |   |  |   |
| <ul style="list-style-type: none"> <li>• Credentialing/re-credentialing requirements are supported by the following evidence:               <ul style="list-style-type: none"> <li>– State law and Federal regulations, including 42 CFR 438.214</li> <li>– State contract requirements</li> <li>– Accreditation guidelines (NCQA)</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>• Provider enrollment is required by State law and Federal regulations, including 42 CFR Part 455, Subpart E-Provider Screening and Enrollment.</li> </ul>   | <ul style="list-style-type: none"> <li>• Credentialing/re-credentialing requirements are supported by the following evidence:               <ul style="list-style-type: none"> <li>– State law and Federal regulations, including 42 CFR 438.214</li> <li>– State contract requirements</li> <li>– Accreditation guidelines (NCQA)</li> </ul> </li> </ul>        | <ul style="list-style-type: none"> <li>• Provider enrollment is required by State law and Federal regulations, including 42 CFR Part 455, Subpart E-Provider Screening and Enrollment.</li> </ul>   |
| <p><b>4. What are the NQTL procedures?</b></p>  |   |  |   |
| <ul style="list-style-type: none"> <li>• All providers must meet credentialing and re-credentialing requirements.</li> <li>• Providers must complete and provide a completed and signed Oregon Practitioner Credentialing Application that includes a release of information and attestation required by the State of</li> </ul>                          | <ul style="list-style-type: none"> <li>• 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</li> </ul> | <ul style="list-style-type: none"> <li>• All providers must meet credentialing and re-credentialing requirements.</li> <li>• Providers must complete and provide the uniform Oregon Practitioner Credentialing and Re-credentialing application, all supporting documents, an Admission plan, S&amp;R policy, whether or not they perform deliveries,</li> </ul> | <ul style="list-style-type: none"> <li>• 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</li> </ul> |

| CCO MH/SUD  | FFS MH/SUD  | CCO M/S   | FFS M/S   |
|---|---|---|---|
| <ul style="list-style-type: none"> <li>• Oregon, proof of malpractice insurance, a copy of their license to practice, a clear background check (OAR 407-007.0220) completed through Yamhill County Human Resources (or other authorized designee per OAR 407-007-0010), and a signed copy of YCHHS Provider Expectations.</li> <li>• Providers may submit supporting documentation by email, mail, fax, courier or hand delivery.</li> <li>• CCO’s credentialing process involves staff review and approval by the Utilization Management Supervisor</li> <li>• The CCO has the Behavioral Health Quality Management Committee (BHQMC) annually review a random sample of credentialing applications and re-credentialing reviews that were denied to ensure that the denial was not based on any discriminatory factor.</li> </ul> | <p>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 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</p> | <p>and a clear background check (OAR 407-007.0220) completed through Yamhill County Human Resources (or other authorized designee per OAR 407-007-0010).</p> <ul style="list-style-type: none"> <li>• Providers may submit supporting documentation by email, mail, fax, courier or hand delivery.</li> <li>• CCO’s credentialing process involves staff review, Medical Director review and Credentialing Committee.</li> <li>• CCO’s credentialing process averages approximately 30 days.</li> <li>• CCO’s Credentialing Committee is responsible for reviewing required information and the Network and Quality Committee of the Board of Directors is responsible for making provider credentialing decisions.</li> <li>• CCO performs re-credentialing every 3 years at minimum.</li> </ul> | <p>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 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</p> |



| CCO MH/SUD  | FFS MH/SUD  | CCO M/S   | FFS M/S   |
|---|---|---|---|
| <ul style="list-style-type: none"> <li>• CCO’s credentialing process averages approximately 30 days.</li> <li>• CCO’s Behavioral Health Quality Management Committee (BHQMC) is responsible for reviewing required information and making provider credentialing decisions.</li> <li>• CCO performs re-credentialing every 3 years at a minimum.</li> <li>• Providers who do not meet credentialing/re-credentialing requirements will not be able to serve CCO members either as a participating provider or as a non-participating provider.</li> <li>• Providers who are adversely affected by credentialing or re-credentialing decisions may challenge the decision by correcting erroneous information obtained by the CCO during the credentialing process.</li> </ul> | <p>information and making provider enrollment decisions</p> | <ul style="list-style-type: none"> <li>• Providers who do not meet credentialing/re-credentialing requirements are not able to participate in the network.</li> <li>• Providers who are adversely affected by credentialing or re-credentialing decisions may challenge the decision through a fair hearing process.</li> </ul> | <p>information and making provider enrollment decisions</p> |



| CCO MH/SUD   | FFS MH/SUD   | CCO M/S  | FFS M/S  |
|--|--|--|--|
| <b>5. How frequently or strictly is the NQTL applied?</b>  |  |  |  |
| <ul style="list-style-type: none"> <li>All providers/provider types must be credentialed.</li> <li>There are no exceptions to meeting these requirements.</li> </ul>   | <ul style="list-style-type: none"> <li>All providers/provider types are subject to enrollment/re-enrollment requirements.</li> <li>There are no exceptions to meeting provider enrollment/re-enrollment requirements.</li> </ul>   | <ul style="list-style-type: none"> <li>All providers/provider types must be credentialed.</li> <li>There are no exceptions to meeting these requirements.</li> </ul>   | <ul style="list-style-type: none"> <li>All providers/provider types are subject to enrollment/re-enrollment requirements.</li> <li>There are no exceptions to meeting provider enrollment/re-enrollment requirements.</li> </ul>   |
| <b>6. What standard supports the frequency or rigor with which the NQTL is applied?</b>  |  |  |  |
| <ul style="list-style-type: none"> <li>Requirement to conduct credentialing for all new providers is established by State law and Federal regulations.</li> <li>The frequency with which CCO performs re-credentialing is based upon:               <ul style="list-style-type: none"> <li>State law and Federal regulations</li> <li>State contract requirements</li> <li>Monitoring of provider performance based upon grievance rates</li> <li>National accreditation standards (NCQA)</li> </ul> </li> <li>CCO monitors the following data/information to determine how strictly to apply</li> </ul> | <ul style="list-style-type: none"> <li>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.</li> </ul> | <ul style="list-style-type: none"> <li>Requirement to conduct credentialing for all new providers is established by State law and Federal regulations.</li> <li>The frequency with which CCO performs re-credentialing is based upon:               <ul style="list-style-type: none"> <li>State law and Federal regulations</li> <li>State contract requirements</li> <li>Monitoring of provider performance based upon grievance rates</li> <li>National accreditation standards (NCQA)</li> </ul> </li> <li>CCO monitors the following data/information to determine how strictly to apply</li> </ul> | <ul style="list-style-type: none"> <li>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.</li> </ul> |



| CCO MH/SUD  | FFS MH/SUD | CCO M/S  | FFS M/S |
|---|------------|--|---------|
| credentialing/re-credentialing criteria: <ul style="list-style-type: none"> <li>– Denial/Termination rates for providers as a result of credentialing/re-credentialing reviews.</li> <li>– Provider appeals/disputes.</li> <li>– Network adequacy data, such as access to care, provider specialties.</li> </ul>  |            | credentialing/re-credentialing criteria: <ul style="list-style-type: none"> <li>– Denial/Termination rates for providers as a result of credentialing/re-credentialing reviews.</li> <li>– Provider appeals/disputes.</li> <li>– Network adequacy data, such as access to care, provider specialties.</li> </ul> |         |
| <b>Analysis</b>   |            |  |         |
| <p>All IP and OP providers of MH/SUD and M/S services were subject to CCO credentialing and recredentialing requirements. YCCO 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’s processes were the same across all benefit packages (CCOA, CCOB, CCOE, and CCOG).</p>  |            |  |         |
| <p>HSAG’s analysis of YCCO’s provider credentialing data did not reveal any parity concerns due to low denial rates for both MH/SUD and M/S providers seeking credentialing during the reporting period. Of the 296 reported average number of providers credentialed during the reporting period, 70.61 percent were MH/SUD providers. There was only one reported denial for any MH/SUD providers seeking credentialing during the reporting period.</p>  |            |  |         |
| <b><u>Comparability</u></b>   |            |  |         |
| <p>YCCO 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 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 email, mail, fax, courier, or hand delivery. Non-licensed MH care providers (e.g., qualified mental health providers/assistants and traditional health care works) were reviewed by contracted MH/SUD facilities according to qualifications and certifications related to specific provider type.</p> |            |  |         |



| CCO MH/SUD  | FFS MH/SUD | CCO M/S | FFS M/S |
|---|------------|---------|---------|
| <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. The process for M/S providers involved a similar review of each application to determine whether standards are met.</p>   |            |         |         |
| <p><b><u>Stringency</u></b></p> <p>The credentialing process for both MH/SUD and M/S providers averaged approximately 30 days depending on the completeness of the application and timeliness of primary source verification documents. The CCO’s BHQMC was responsible for reviewing required information and making provider credentialing decisions for MH/SUD, and the CCO’s credentialing committee made credentialing decisions for M/S providers. Recredentialing for both MH/SUD and M/S providers was being conducted every three years. Failure for MH/SUD and M/S providers to meet credentialing and recredentialing requirements resulted in exclusion from the CCO’s network. MH/SUD and M/S providers who have been adversely affected by credentialing or recredentialing decisions may challenge the decision by correcting erroneous information obtained by the CCO during the credentialing process. The CCO monitored similar metrics related to applying credentialing and recredentialing requirements for MH/SUD and M/S providers, including reviewing denial/termination provider rates resulting from credentialing/recredentialing reviews, provider appeals/disputes, and network adequacy data (access to care and provider specialties).</p> |            |         |         |
| <p><b>Outcome</b></p>   |            |         |         |
| <p>HSAG’s analysis found YCCO’s credentialing and recredentialing processes and data for MH/SUD providers to be comparable and no more stringently applied, in writing and in operation, than those for M/S providers.</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 YCCO’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   |
|---|---|---|---|
| <b>1. To which benefit is the NQTL assigned?</b>  |   |   |   |
| <ul style="list-style-type: none"> <li>Out of Network (OON) and Out of State (OOS) Benefits</li> </ul>  | <ul style="list-style-type: none"> <li>OOS Benefits</li> </ul>  | <ul style="list-style-type: none"> <li>Out of Network (OON) and Out of State (OOS) Benefits</li> </ul>  | <ul style="list-style-type: none"> <li>OOS Benefits</li> </ul>  |
| <b>2. Why is the NQTL assigned to these benefits?</b>   |   |   |   |
| <ul style="list-style-type: none"> <li>The purpose of having an open network is to ensure that members have access to appropriate quality care.</li> <li>The purpose of providing OOS coverage is to provide needed services when they are not available in-State.</li> <li>The purpose of prior authorizing non-emergency OOS benefits is to determine the medical necessity of the</li> </ul> | <ul style="list-style-type: none"> <li>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.</li> </ul> | <ul style="list-style-type: none"> <li>The purpose of having an open network is to ensure that members have access to appropriate quality care.</li> <li>The purpose of providing OOS coverage is to provide needed services when they are not available in-State.</li> <li>The purpose of prior authorizing non-emergency OOS benefits is to determine the medical necessity of the</li> </ul> | <ul style="list-style-type: none"> <li>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.</li> </ul> |

| CCO MH/SUD  | FFS MH/SUD  | CCO M/S   | FFS M/S   |
|---|---|---|---|
| <p>requested benefit and the availability of an in-State provider.</p>  | <ul style="list-style-type: none"> <li>The purpose of providing OOS coverage is to provide needed services when the service is not available in the State of Oregon or the client is OOS and requires covered services.</li> <li>The purpose of PA for non-emergency OOS services is to ensure the criteria in OAR 410-120-1180 are met.</li> </ul> | <p>requested benefit and the availability of an in-State provider.</p>  | <ul style="list-style-type: none"> <li>The purpose of providing OOS coverage is to provide needed services when the service is not available in the State of Oregon or the client is OOS and requires covered services.</li> <li>The purpose of PA for non-emergency OOS services is to ensure the criteria in OAR 410-120-1180 are met.</li> </ul> |
| <p><b>3. What evidence supports the rationale for the assignment?</b></p>   |   |   |   |
| <ul style="list-style-type: none"> <li>The CCO covers OON/OOS benefits in accordance with Federal and State requirements, including OAR and the CCO contract.</li> </ul>  | <ul style="list-style-type: none"> <li>The State covers OOS benefits in accordance with OARs.</li> </ul>  | <ul style="list-style-type: none"> <li>The CCO covers OON/OOS benefits in accordance with Federal and State requirements, including OAR and the CCO contract.</li> </ul>  | <ul style="list-style-type: none"> <li>The State covers OOS benefits in accordance with OARs.</li> </ul>  |
| <p><b>4. What are the NQTL procedures?</b></p>  |   |   |   |
| <ul style="list-style-type: none"> <li>CCO has an open network so any service delivered by in-State OON Medicaid providers is treated identically to network providers from a coverage standpoint. In other words, if the benefit is covered and properly delivered, billed and authorized, the provider will be paid for those services at the DMAP rate.</li> </ul> | <ul style="list-style-type: none"> <li>Non-emergency OOS services are not covered unless the service meets the OAR criteria.</li> <li>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.</li> </ul>                        | <ul style="list-style-type: none"> <li>CCO has an open network so any service delivered by in-State OON Medicaid providers is treated identically to network providers from a coverage standpoint. In other words, if the benefit is covered and properly delivered, billed and authorized, the provider will be paid for those services at the DMAP rate.</li> </ul> | <ul style="list-style-type: none"> <li>Non-emergency OOS services are not covered unless the service meets the OAR criteria.</li> <li>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.</li> </ul>                        |

| CCO MH/SUD   | FFS MH/SUD   | CCO M/S   | FFS M/S  |
|--|--|---|--|
| <ul style="list-style-type: none"> <li>For most services, OOS providers are not covered unless they are contracted as part of a contiguous network area close to service area borders.</li> <li>Non-emergency OOS services by non-contract providers are not covered unless medically necessary services are not available in-State.</li> <li>Requests for non-emergency OOS services are made through the prior authorization process.</li> <li>The timeframe for approving or denying a non-emergency OOS request is the same as for other prior authorizations (14 days for standard requests).</li> <li>The CCO establishes a rate agreement (similar to a SCA) if the OON/OOS provider will not accept DMAP rates. For all other OON/OOS providers the CCO provides a print out from the authorization system that includes the relevant</li> </ul> | <ul style="list-style-type: none"> <li>Requests for non-emergency OOS services are made through the State PA process.</li> <li>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).</li> <li>OOS providers must enroll with Oregon Medicaid.</li> <li>The State pays OOS providers the Medicaid FFS rate.</li> </ul> | <ul style="list-style-type: none"> <li>For most services, OOS providers are not covered unless they are contracted as part of a contiguous network area close to service area borders.</li> <li>Non-emergency OOS services by non-contract providers are not covered unless medically necessary services are not available in-State.</li> <li>Requests for non-emergency OOS services are made through the prior authorization process.</li> <li>The timeframe for approving or denying a non-emergency OOS request is the same as for other prior authorizations (14 days for standard requests).</li> <li>The CCO establishes a single case agreement (SCA) with an OON/OOS provider if the provider will not accept DMAP rates.</li> <li>The CCO's process for establishing a SCA includes contacting the OON/OOS</li> </ul> | <ul style="list-style-type: none"> <li>Requests for non-emergency OOS services are made through the State PA process.</li> <li>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).</li> <li>OOS providers must enroll with Oregon Medicaid.</li> <li>The State pays OOS providers the Medicaid FFS rate.</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD  | CCO M/S  | FFS M/S   |
|--|---|--|---|
| <p>information, including member, service, time period, and rate.</p> <ul style="list-style-type: none"> <li>Only providers enrolled in Oregon Medicaid can qualify as an OON/OOS provider.</li> <li>All OON/OOS providers are credentialed by the CCO.</li> <li>The CCO pays OON/OOS providers the Medicaid FFS rate or a negotiated rate.</li> </ul>                     |   | <p>provider to collect rendering/submitting NPI, tax ID, DMAP ID and negotiating the terms of the SCA.</p> <ul style="list-style-type: none"> <li>The average length of time to negotiate a SCA is 2 to 3 days.</li> <li>Only providers enrolled in Oregon Medicaid can qualify as an OON/OOS provider.</li> <li>The rate the CCO pays OON/OOS providers includes the Medicaid FFS rate, a percentage of the Medicaid FFS rate and a negotiated rate.</li> </ul> |   |
| <p><b>5. How frequently or strictly is the NQTL applied?</b></p>   |   |  |   |
| <ul style="list-style-type: none"> <li>If a request for a non-emergency OOS benefit does not meet the CCO's OOS criteria, it will not be prior authorized.</li> <li>If a non-emergency OOS benefit is not prior authorized, the service will not be covered, and payment for the service will be denied.</li> <li>Members/providers may appeal the denial of an</li> </ul> | <ul style="list-style-type: none"> <li>If a request for a non-emergency OOS benefit does not meet the OAR criteria, it will not be authorized.</li> <li>If a non-emergency OOS benefit is not authorized, the service will not be covered, and payment for the service will be denied.</li> </ul> | <ul style="list-style-type: none"> <li>If a request for a non-emergency OOS benefit does not meet the CCO's OOS criteria, it will not be prior authorized.</li> <li>If a non-emergency OOS benefit is not prior authorized, the service will not be covered, and payment for the service will be denied.</li> <li>Members/providers may appeal the denial of an</li> </ul>   | <ul style="list-style-type: none"> <li>If a request for a non-emergency OOS benefit does not meet the OAR criteria, it will not be authorized.</li> <li>If a non-emergency OOS benefit is not authorized, the service will not be covered, and payment for the service will be denied.</li> </ul> |

| CCO MH/SUD   | FFS MH/SUD   | CCO M/S   | FFS M/S  |
|--|--|---|--|
| <p>• OON/OOS request or non-payment of an OON/OOS claim.</p>   | <ul style="list-style-type: none"> <li>Members/providers may appeal the denial of an OOS request.</li> <li>The State measures the stringency of the application of OOS requirements by reviewing OOS denial/appeal rates.</li> </ul> | <p>• OON/OOS request or non-payment of an OON/OOS claim.</p>  | <ul style="list-style-type: none"> <li>Members/providers may appeal the denial of an OOS request.</li> <li>The State measures the stringency of the application of OOS requirements by reviewing OOS denial/appeal rates.</li> </ul> |
| <p><b>6. What standard supports the frequency or rigor with which the NQTL is applied?</b></p>   |  |   |  |
| <ul style="list-style-type: none"> <li>Federal and State requirements, including OAR and the CCO contract.</li> </ul>  | <ul style="list-style-type: none"> <li>The State covers OOS benefits in accordance with OAR.</li> </ul>  | <ul style="list-style-type: none"> <li>Federal and State requirements, including OAR and the CCO contract.</li> </ul> | <ul style="list-style-type: none"> <li>The State covers OOS benefits in accordance with OAR.</li> </ul>  |
| <p><b>Analysis</b></p>   |  |   |  |
| <p>YCCO 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, the State 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). YCCO established SCAs with OON providers in the absence of INN providers to ensure the provision of appropriate quality care for members, while OHP FFS ensured OON providers were enrolled with Medicaid.</p>            |  |   |  |
| <p><b>Comparability</b></p>  |  |   |  |
| <p>For both nonemergency MH/SUD and M/S OON/OOS benefits, the CCO (and the State for FFS MH/SUD OOS benefits) required 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 an 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> |  |   |  |
| <p><b>Stringency</b></p>   |  |   |  |
| <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,</p>  |  |   |  |



| CCO MH/SUD   | FFS MH/SUD | CCO M/S | FFS M/S |
|--|------------|---------|---------|
| <p>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. YCCO 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. For both MH/SUD and M/S benefits, YCCO and OHP FFS would not authorize payment for services denied.</p> |            |         |         |
| <p><b>Outcome</b></p>  |            |         |         |
| <p>HSAG determined YCCO’s processes, strategies, and evidentiary standards for OON/OOS limits applied to MH/SUD to be 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

| Yamhill Community Care Organization MHP Improvement Plan                      |           |                  |                                  |                                 |
|---|-----------|------------------|----------------------------------|---------------------------------|
| Year  | Finding # | Report Reference | Finding                          | Required Action                 |
| 2020  | 1         | Page. #          |                                  |                                 |
| <b>CCO Intervention/Action Plan</b>   |           |                  | <b>Individual(s) Responsible</b> | <b>Proposed Completion Date</b> |
|   |           |                  |                                  |                                 |
| <b>HSAG Assessment of CCO Intervention/Action</b>                             |           |                  |                                  |                                 |
|   |           |                  |                                  |                                 |
| <b>CCO Post-Implementation Status Update</b>                                  |           |                  |                                  |                                 |
|   |           |                  |                                  |                                 |
| <b>Documentation Submitted as Evidence of Implemented Intervention/Action</b> |           |                  |                                  |                                 |
|   |           |                  |                                  |                                 |
| <b>HSAG Assessment of Intervention/Action Implementation</b>                  |           |                  |                                  |                                 |
|   |           |                  |                                  |                                 |